

# Lewisham Local Plan Regulation 19 Consultation: Landowner Representations

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**From:** Ben Ford <ben.ford@quod.com>  
**Sent:** 25 April 2023 18:02  
**To:** LocalPlan  
**Cc:** Matthew Sherwood  
**Subject:** Lewisham Reg 19: Representations by Landsec  
**Attachments:** 230425 Landsec Representations Reg 19 Lewisham Local Plan.pdf

Dear Sir

**Lewisham Reg 19: Representations by Landsec**

Landsec welcomes the opportunity to engage with Lewisham Council on its Regulation 19 Local Plan (the “Reg 19 Plan”).

Landsec supports the Council’s ambition for growth and renewal across the borough and within Lewisham Major Town Centre, its principal town centre. Landsec commends the Council on many of its development plan policies and considers that these are consistent with national planning policy and the London Plan.

The key modifications to the Reg 19 Plan proposed by Landsec are summarised below.

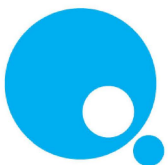
- We proposed that indicative capacities enclosed in Site Allocation 2 are revised to reflect site specific proposals by Landsec, pre-application discussions and Landsec’s up to date needs assessment. The indicative capacity should refer to 2,500 homes and 40,000 sqm of main town centre floorspace.
- Site Allocation 2 should include additional text which recognises the significant infrastructure requirements and abnormal costs of delivering the site allocation policy objectives.
- The maximum building height threshold for Site Allocation 2 (Figure 5.5 and Schedule 12) should increase to 30 storeys to reflect the transition with land to the north. Additional text is required to recognise that the maximum height threshold proposed is indicative and may be exceeded through detailed pre-application analysis. We also suggest that the heights in metres should be removed from Policy QD4 as the floor-to-floor assumptions do not reflect the design requirements for town centre development. We suggest that the tall building zone (eastern boundary) be revised to align to the rear of the high street buildings along the eastern boundary to reflect the Council’s tall building evidence base and include land to the northeast corner of Site Allocation 2.
- The Council’s retail capacity figures should be updated, or additional text included to confirm that updated analysis is required on a site-by-site basis to support specific planning applications. The retail impact tests should be removed for town centre planning applications to ensure consistency with national policy.

Landsec is willing to enter a statement of common ground with the Council in advance of the Local Plan examination in public.

If you do have any queries, please do not hesitate to contact me.

Regards

Ben



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# Lewisham Regulation 19 Local Plan

## Representations by Landsec

Lewisham Shopping  
Centre

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25th April 2023

Q200103

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# 1 Executive Summary

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- 1.1 Landsec welcomes the opportunity to engage with Lewisham Council on its Regulation 19 Local Plan (the “Reg 19 Plan”).
- 1.2 Landsec supports the Council’s ambition for growth and renewal across the borough and within Lewisham Major Town Centre, its principal town centre. Landsec commends the Council on many of its development plan policies and considers that these are consistent with national planning policy and the London Plan.
- 1.3 Landsec is the owner of Lewisham Shopping Centre, the principal site allocation and development opportunity for Lewisham Town Centre. Site Allocation 2 of the Reg 19 Plan is largely comprised of the shopping centre.
- 1.4 Whilst these representations are written to be read as a comprehensive document, included at **Appendix 1** is the Council’s completed ‘Proposed Submission document Regulation 19 draft Consultation Questions’ Form which includes cross references.

## Summary of Proposed Modifications to the Regulation 19 Local Plan

- 1.5 The key modifications to the Reg 19 Plan proposed by Landsec are summarised below.
  - We proposed that indicative capacities enclosed in Site Allocation 2 are revised to reflect site specific proposals by Landsec, pre-application discussions and Landsec’s up to date needs assessment. The indicative capacity should refer to 2,500 homes and 40,000 sqm of main town centre floorspace.
  - Site Allocation 2 should include additional text which recognises the significant infrastructure requirements and abnormal costs of delivering the site allocation policy objectives.
  - The maximum building height threshold for Site Allocation 2 (Figure 5.5 and Schedule 12) should increase to 30 storeys to reflect the transition with land to the north. Additional text is required to recognise that the maximum height threshold proposed is indicative and may be exceeded through detailed pre-application analysis. We also suggest that the heights in metres should be removed from Policy QD4 as the floor-to-floor assumptions do not reflect the design requirements for town centre development. We suggest that the tall building zone (eastern boundary) be revised to align to the rear of the high street buildings along the eastern boundary to reflect the Council’s tall building evidence base and include land to the northeast corner of Site Allocation 2.
  - The Council’s retail capacity figures should be updated, or additional text included to confirm that updated analysis is required on a site-by-site basis to support specific planning applications. The retail impact tests should be removed for town centre planning applications to ensure consistency with national policy.
- 1.6 Landsec is willing to enter a statement of common ground with the Council in advance of the Local Plan examination in public.

## Background

- 1.7 During 2020 Landsec undertook a detailed review of its Urban Regeneration portfolio in response to the structural change nationally in the retail sector. Town centres and the way we shop have been rapidly changing due to the growth of online shopping. The retail sector is going through its biggest upheaval since the 2008 financial crash which instigated structural change well before the global pandemic. COVID-19 has accelerated the change and the demand for retail floorspace is changing. The Arcadia Group (Topshop, Dorothy Perkins, Burton and Miss Selfridge); Debenhams; Monsoon; Aldo; Antler; Oasis and Warehouse; Debenhams; Cath Kidston; Laura Ashley; and Peacocks are just a few established high street retailers who have gone into administration and left the high street.
- 1.8 How town centres, including Lewisham, are used by local people and retailers will change forever. Landsec's assessment included its landholdings in Lewisham and included a feasibility study to rethink the future of the 45-year-old shopping centre. Landsec engaged various stakeholders who responded with an overriding desire for change. Almost 70% of respondents supported Landsec's vision to deliver a visionary town centre regeneration programme focused around transforming an outdated shopping centre into an integrated and connected thriving modern metropolitan centre that will be a source of local identity, pride and economic opportunity for Lewisham. Overall, the community wanted a cleaner, safer town centre with a redesigned shopping centre, and more pedestrian areas with a greater mix of uses including those that would support a night-time economy. Lewisham Council and the Greater London Authority both agreed that the comprehensive redevelopment of the shopping centre and adjacent land will be central to achieving the vision and objectives for Lewisham town centre.
- 1.9 Reinvention will not detract from Landsec's ambition to secure a vibrant and vital future for Lewisham, it is simply that this ambition will have to be achieved in a new and innovative way, supported by a flexible development plan. A new vision is required which seeks to balance several strategic planning issues which we comment on in these representations. These are long term vacant floorspace; demand for new commercial floorspace; economic regeneration; development economics and scheme delivery; tall buildings; housing including affordable housing.

## Landsec Vision

- 1.10 Landsec's Vision is the sustainable and mixed-use transformation of Site Allocation 2 to re-integrate the place within its surrounding fabric, weaving the old and the new to create a layered living neighbourhood above a vibrant and high performing commercial hub. To secure Lewisham's future, healthy living and flexible working will come together around a diverse leisure and retail offer that caters to all. New connecting opportunities will enable the site to open and bring nature in. The place-shaping process will be inclusive and informed by public engagement to build upon what already makes the place special, and ensure the place grows organically over time.
- 1.11 Landsec's vision is based upon the foundations set by Lewisham Council, national planning and the London Plan which support adaptation and diversification of town centres to respond to the anticipated needs. By taking a positive approach to growth, management and adaptation town centres are expected to grow and diversify in a way that can respond to rapid changes in retail and leisure needs allowing a suitable mix of uses including housing. It is recognised that

residential development plays an important role in ensuring the vitality and viability of our town centres.

## Existing Policy

- 1.12 National policy and the London Plan establish the policy framework for town centre diversification to meet the changing face of retail, the recognition that new homes contribute to town centre vitality and viability and the important role that the evening economy has in retaining expenditure and providing entertainment and leisure services. We set this out in detail at Appendix 2.
- 1.13 The London Plan allocates New Cross/Lewisham/Catford as an opportunity area for 13,500 homes and 4,000 jobs. It recognises that Lewisham will grow in function and population and has the potential to become a town centre of Metropolitan importance. Public realm and environmental enhancements of the town centre are proposed to assist the continued transformation of Lewisham into a 'high performing' and 'vibrant' retail hub with excellent leisure services.
- 1.14 The adopted Lewisham Local Plan (2014) recognises that Lewisham Shopping Centre will be 'redeveloped over time'. It promotes redevelopment of the Leisure Box and Riverdale Hall for commercial uses at ground floor and residential above and supports residential conversion of the Citibank Tower (Lewisham House). It also allocates comprehensive redevelopment of the Beatties Building and model market to provide retail/restaurants on the ground floor with commercial or residential uses on the upper floors.

## Lewisham Regulation 18 Policy

- 1.15 The Council's early review (Regulation 18) into the local plan (the "Reg 18 Plan") promotes wholesale redevelopment of the shopping centre and adjacent land, known as Site Allocation 2. The Reg 18 Plan allocation included an indicative capacity for 1,579 homes, and 80,388m<sup>2</sup> of commercial floorspace (20,097m<sup>2</sup> employment and 60,291m<sup>2</sup> main town centre) based upon a generic density matrix which was appropriate at that time, prior to detailed pre-application discussions or an assessment of town centre needs. Landsec submitted representations evidencing that housing capacity should increase to c.2,500 homes and commercial floorspace should be reduced by c.50% to reflect current occupancy levels and future retail needs.
- 1.16 Positively, the Council recognised that applying prescriptive definitions of maximum and minimum quanta of defined uses was not something that would be helpful to impose, and that the indicative capacities set out in Site Allocation 2 should be considered as starting points in terms of the broad quantum of development. The Council would not seek to apply these prescriptively.
- 1.17 We welcome this flexible approach and consider that the Reg 19 Plan Site 2 Allocation indicative site capacities should be updated to reflect Landsec's proposals and the site-specific analysis that has been undertaken.



## Town Centre Uses

- 1.18 The performance and retail vibrancy of Lewisham is not reliant on more retail floorspace. In fact, the opposite is likely to be true. Since 2009, the Council's evidence base has identified a decline in retail floorspace needs in Lewisham Town Centre. Despite originally forecasting a market share increase to support 40,000 sqm of additional retail floorspace to achieve Metropolitan status, this level of growth has fallen away and there is now an oversupply of retail floorspace in Lewisham.
- 1.19 We consider the role and function of Lewisham Town Centre and the physical characteristics of Lewisham Shopping Centre in detail at **Appendix 3**.
- 1.20 Whilst the Council's retail update was published to inform the Reg 18 Plan, it did not consider the fundamental shift in retailing that has taken place in recent years. It relies on expenditure estimates and forecasts published before the pandemic (2018), and derives population estimates from 2015. The assessment is also underpinned by a household survey undertaken in September 2015. Owing to the date of this information, the retail evidence informing the Local Plan does not yet provide an up-to-date basis for assessing future retail and leisure needs for Lewisham town centre. The assumptions relating to special forms of trading (internet shopping); growth rates; shopping patterns within and outside the borough haven't yet been updated.
- 1.21 Landsec has commissioned, using a methodology agreed with the LPA and their specialist advisors, a new household study and has applied the latest industry forecasts on special forms of trading (internet shopping); growth rates; shopping patterns within and outside the borough.
- 1.22 To supplement these findings and to better understand the trading performance of existing facilities and shopping patterns, Landsec commissioned CACI Limited ('CACI'). This additional analysis is extremely useful, and in our view provides an accurate additional layer of evidence to help better understand shopping patterns. It also allows us to sensitivity test the outcomes of the household survey as CACI data includes actual store turnover. The CACI analysis is derived from actual debit and credit card transaction data, which will recognise that shoppers use multiple destinations and that a transaction value differs on a store and location basis.
- 1.23 The effect of applying the latest data substantially reduces the available retail expenditure and identifies that there is a significant oversupply of existing retail floorspace. Lewisham's market share has not increased as expected, and the town centre's penetration draws principally from a localised catchment. Online shopping has increased significantly, well beyond the Council's forecasts of 3.8% and 16.8% applied by the evidence base supporting the Reg 19 Plan. The latest published figures identify that online market share has increased to 5.4% and 25.6% respectively for convenience and comparison goods.
- 1.24 Another indicator is vacant floorspace. A conservative estimate suggests that combined with oversupply, this equates to between c.17,000sqm<sup>1</sup> to 31,000sqm<sup>2</sup> of floorspace within

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<sup>1</sup> Quod Retail Technical Report (Appendix 2) Table 5.1.

<sup>2</sup> If the comparison goods market share went back to pre-Covid levels of 15.4%, then this would result in an oversupply of more than 21,700 m<sup>2</sup> (gross) of floorspace by 2040, in addition to vacant floorspace would equate to 31,000m<sup>2</sup>.

Lewisham Town Centre much of which is upper floor areas. In comparing the retail evidence prepared between 2009 and 2023, the capacity for Lewisham town centre is identified to have reduced by more than £193 million. This represents a substantial quantum, and it is within this context that the Reg 19 Plan policies must be updated, and appropriate flexibility applied.

- 1.25 We do not therefore consider that Site Allocation 2 should promote a near like for like retention of commercial floorspace (80,388m<sup>2</sup>) as this is not supported by Landsec's or the Council's evidence base. In our opinion, the commercial site capacity for Site Allocation 2, in policy terms, should reflect the existing occupied floorspace. This would equate to c.40,000m<sup>2</sup> of new town centre floorspace.
- 1.26 A reduction in existing floorspace would not have a negative effect on the town centre, as much of this floorspace is already vacant, serving no economic function, and detracting from the vitality and viability of Lewisham. The provision of new floorspace in comparison does represent an excellent opportunity for the Council, and residents of Lewisham. The need for retail floorspace consolidation and the Council's objective for potential Metropolitan status are not mutually exclusive objectives. The London Plan recognises, in the case of Lewisham, that its potential relates to the further growth supported by the arrival of the Bakerloo line at Lewisham Interchange (although not reliant on it and in the event that the Bakerloo line happens, this would not create a demand for additional floorspace.); enhanced access to central London; encouraging the delivery of employment, leisure, service and community uses that serve the local and sub-regional population; public realm and environmental enhancements; and the continued transformation of Lewisham into a 'high performing' and 'vibrant' retail hub; with excellent leisure services. It is the performance of the retail floorspace and its vibrancy that defines its potential re-classification, not its quantum, and there is no reason why Lewisham cannot become a high performing and vibrant retail hub through redevelopment and floorspace consolidation.
- 1.27 Lewisham Shopping Centre comprises an outdated retail model which does not serve the town centre as well as it could principally through a lack of permeability, poor environment, limited mix of uses, lack of afterhours footfall and a number of big box retailers which traditionally rely on car borne trips. With the removal of car parking from the development in line with London Plan and emerging policy, large box retailers will have to adapt. Our analysis demonstrates that retailers such as Primark, H&M and TK Max operate from smaller stores in higher order town centres which offers the prospect of Lewisham attracting more national retailers to smaller floorplates alongside increased opportunities for independents. This can result in improvements to employment density ratios as well as increased sales densities reducing the prospects of long term vacancies. Smaller optimised retail units, which are less reliant on a handful of national retailers, represent a more sustainable retail offer for the future. Our analysis shows that the most successful major town centres contain an above average number of independent retailers. Lewisham can become a high performing and vibrant retail hub with this approach.
- 1.28 It is also possible to maintain and enhance employment numbers and increase footfall through intensification and a mix of uses and the contribution of the missing offer of a night time economy. Catford, for example, scores higher than Lewisham for its night time economy.
- 1.29 To complement greater employment densities, skills and training initiatives can be delivered both for retail and other professional jobs. New homes (including affordable homes) will

generate increased council tax and new homes bonus and local spending. Indirect jobs and residential spending will contribute to vibrancy of the town centre and employment benefits will be complemented by end use employment and gross value add.

1.30 The outcomes that are secured through investment in a town centre such as jobs, homes, businesses, health and wellbeing, safety, permeability, beautiful buildings, carbon reduction, accessibility, culture and urban greening can become the new ingredients for success and ambition of potential Metropolitan status. The future of Site Allocation 2 is clearly a catalyst to achieving these outcomes as the largest most central site in Lewisham, and these improvements can only take place with physical rationalisation of the existing commercial floorspace.

## Residential Floorspace

1.31 It is agreed that residential floorspace will comprise an integral component of Site Allocation 2, and national, regional and local planning policy recognises the contribution that town centre housing will make to the vitality and viability of Lewisham.

1.32 Site Allocation 2 seeks the delivery of at least 1,579 homes. Numerically, we consider that this comprises an underutilisation of this central town centre site. 1,579 homes would result in a density of 247 dwellings per hectare, significantly below the previous London Plan density matrix of 405 dwellings per hectare for such sites, which itself was routinely exceeded. This density would also be substantially below (c.40%) the prevailing densities approved in Lewisham town centre over recent years.

1.33 Due to the greater level of policy ambition to optimise accessible brownfield sites, housing need, and Site Allocation 2 representing the largest and most accessible town centre site for the Council, it would not represent a good use of land to promote residential densities substantially below the prevailing new build character. Landsec has provided studies which we believe demonstrate that through specific site analysis that the capacity of Site Allocation 2 can deliver at least 2,500 new homes.

1.34 This approach would help the Council to meet its minimum housing requirements. Lewisham is widely acknowledged as a borough that takes its housing requirements seriously, but despite this, delivery remains below actual housing need within the borough.

1.35 The Reg 19 Plan plans to make up for previous shortfalls in housing delivery which equates to 462 dwellings per annum<sup>3</sup> (“dpa”) in addition to a 5% buffer for continued undersupply of 83 dpa. In addition, it seeks to meet the London Plan requirement which equate to 1,667 dpa. It is widely acknowledged that the London plan target falls short of the actual housing needs of London. This is evidenced by the application of the Government’s standard methodology assessment which equates to a Lewisham housing requirement of 3,151 dpa, more than double the local plan target. Set in the context of past delivery, this is a significant target. Only 599 homes were delivered in 2021-22 and 181 in 2020-2021<sup>4</sup>. The ten-year delivery average,

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<sup>3</sup> Reg 19 Plan paragraph 7.2

<sup>4</sup> Authority Monitoring Report 2021-22, December 2022

in a successful borough of growth, has only been 1,317 dpa. There is a clear need to optimise housing delivery on the most sustainable and accessible sites.

- 1.36 Residential development also performs an integral role for the development economics of a proposal. Unlike other proposals which are subject to cleared, or low intensity land uses, Site Allocation 2 is an extremely complex site as we discuss below.

## Viability of Delivery

- 1.37 There are numerous existing commercial rights which have been acquired across the site over recent years; 3<sup>rd</sup> party interests; legal interests across multiple levels; and physical overlays of different buildings with different land interests and structural grids. These existing constraints represent significant abnormal costs<sup>5</sup>. Further abnormal costs are associated with the phased nature of delivery, a strategy necessary to avoid extensive wholesale demolition which could adversely impact town centre vitality and viability. The scheme must also deliver appropriate social and physical infrastructure to serve its residents and the wider community. Whilst a complex issue, abnormal costs do represent a fundamental part of the planning narrative.
- 1.38 We have reviewed the Council's evidence base in respect of viability as prepared by BNPP. It is straightforward to adapt this work in order to test alternative development scenarios, and we have done so below in order to assist the Council in understanding the specific issues with comprehensive regeneration in Lewisham town centre.
- 1.39 The BNPP study tests development across the 6.37ha site (referred to as site 46 Lewisham Shopping Centre) assuming a site capacity of 1,186 homes and 83,003m<sup>2</sup> of commercial floorspace. Prior to any allowance for site exceptional / abnormal costs, the BNPP study concludes that the Lewisham Shopping Centre site is capable of delivering 0% affordable homes at £6,500/m<sup>2</sup>, just below the current average sales value. Where the study tests greater residential sales values, affordable housing theoretically can be delivered but only on the assumption that there are £0 abnormal costs, which of course is not the case.
- 1.40 It is understandable that the Council's consultants did not include exceptional costs as this information was not available to them (and the BNPP report acknowledges it is seeking to set a consistent baseline for all sites, prior to allowance for these site-specific costs). However, the Council's own evidence suggests that an allocation of 1,579 homes will prevent any meaningful affordable housing and may risk delivery of the site.

## Design Led Optimisation

- 1.41 Through the pre-application engagement work that Landsec has undertaken with the Council, GLA and local community, the following evidence-based principles have been derived to guide the redevelopment of the shopping centre:

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<sup>5</sup> In addition to substantial exceptional / abnormal costs including utilities reinforcements, highways works, remediation / asbestos removal, service diversions, demolition / reconfiguration of existing spaces & basements and vacant possession costs.

- Re-establish the framework – introduce key connections reflecting how Lewisham is navigated today.
  - Rooting the place – promoting Lewisham’s built and social heritage.
  - Amplify the town centre – create a thriving new Metropolitan Town Centre, inclusive and accessible to all.
  - Growing a destination – concentrating public space to create an accessible safe and unified location for Lewisham.
- 1.42 A design led optimised approach by Studio Egret West demonstrates that tall buildings are a necessary and important typology to deliver the planning objectives at this site. Whilst tall buildings are considered appropriate in this location under existing and emerging planning policy, they are also necessary as a design and delivery tool to break open the inward facing shopping centre and create new open space, permeable routes, active frontages and a package of public benefits. They are an inevitable consequence of a new mixed use town centre model.
- 1.43 Positively, with a rational approach to townscape and heritage, tall buildings can contribute to the role and function of Lewisham and the potential Metropolitan classification of the town centre. Tall building typologies, up to 35 storeys, have already been proposed to the north of Lewisham town centre, redeveloping large retail warehouse floorplates and infrastructure sites.
- 1.44 However, the historic heart of Lewisham is the linear high street and market, with Lewisham shopping centre located behind this to the west. Whilst the high street is historic, it is not a designated heritage asset, which might otherwise present a limitation on optimisation. The rebalancing of the town centre height hierarchy to its geographical core is important for its health, vitality and viability. Site Allocation 2 is fundamental to this. There is a genuine transformative opportunity to connect the northern and southern tips of the town centre (a 2014 policy objective), connections east and west, and a critical mass of development within the core to draw Lewisham towards its town centre reclassification. Importantly, it can achieve this largely through single ownership enabling a comprehensive approach in phases to maintain operational continuity of trade and limiting disruption to the rest of the town centre.
- 1.45 Tall buildings, alongside some linear blocks, are proposed to be the principal building typology at Site Allocation 2 to enable phased delivery, continuity of trade, improved residential amenity and deliver new public realm. Site Allocation 2 affords the opportunity to place the greatest emphasis in the area that has the greatest significance to the function of the town, and we consider that proposed maximum heights should be subject to site specific analysis which is likely to only be available at the planning application stage.
- 1.46 It is our opinion that an indicative maximum height threshold of 30 storeys is appropriate for Site Allocation 2 and should be reflected in Figure 5.5 of the Reg 19 Plan and at Schedule 12 (Tall Building Suitability Zones). We do consider that from our own analysis of townscape, heritage, microclimate and regeneration needs that tall buildings of 35 storeys can be successfully accommodated within the allocation at specific, and limited, locations.

## Community Engagement

- 1.47 Many of the planning objectives set out in the adopted and emerging development plan have been reflected in the consultation exercises undertaken by Landsec. There is an overriding desire for change. People want a cleaner, safer town centre, redesigned shopping centre, and more pedestrian areas. More independent retailers, cafes & restaurants are sought and whilst Lewisham market is popular, there are strong views about the way it is managed and the negative effects it has on the public realm.
- 1.48 Landsec's community engagement has been extensive. It has undertaken programmes of consultation and engagement including public exhibitions in 2021 and 2022 and has engaged many local stakeholders.
- 1.49 Landsec undertook a listening exercise in 2020. This comprised an extensive consultation programme to help better understand how the local community felt about the shopping centre and wider town centre. The consultation involved a six-week consultation period; 10,000 newsletters; contact with 115 community groups and organisations; a consultation website; Facebook advertising to promote the consultation process; two virtual village halls; and street canvassing. Landsec received an excellent response with 2,231 website visits; 732 consultation responses of which 25% responses were from BAME other ethnic groups.
- 1.50 A summary of what people told Landsec is set out below.
- 60% visited the town centre once a week or less.
  - Change is wanted: people want a cleaner, safer town centre, redesigned shopping centre, and more pedestrian areas.
  - More independent retailers, cafes & restaurants are sought.
  - Lewisham market is popular, but there are strong views about the way it is managed.
  - 71% said new arts and cultural space would improve the town centre.
  - Adding more shops ranked lowest as a positive impact.
- 1.51 The consultation identified considerable affection for Lewisham town centre but a feeling that it has become unloved. There is a strong desire for it to become a vibrant and exciting place again, with recognition for change. Lewisham Shopping Centre is key to that new start with a desire to see more in the town centre than retail, with a strong focus on cultural and other uses such as community and Food & Beverage.
- 1.52 The feedback from the consultation has helped inform Landsec's thinking around the future vision for the town centre which is set out in these representations.
- 1.53 Further consultation took place in November and December 2021 including a public exhibition held in Lewisham Shopping Centre. 609 people visited the exhibition and over 8,000 people visited the consultation website, with 751 respondents providing feedback to the consultation. Challenges identified around the town centre included an unappealing environment, a lack of planting and the need for a more diverse retail offering. Respondents overwhelmingly considered that Lewisham Town Centre would benefit from having a greater mix of residential,

workspace, community, retail and leisure facilities. Respondents said that a wider offering in the town centre would encourage them to use the high street and market more.

- 1.54 It was also considered that the town centre is seen as a place that serves functional needs, rather than an active destination point. There is a lack of civic space, and the town centre lacks accessible, well maintained and properly managed green spaces. The shopping centre acts as a barrier to movement and there is a desire for better permeability. More night-time activity is sought and Lewisham Market is an important part of life in Lewisham town centre.
- 1.55 A summary of Landsec's community engagement is provided in **Appendix 4**. Further engagement is planned in 2023.

## 2 Site Allocation 2 - Lewisham Shopping Centre

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- 2.1 The Reg 19 Plan states (paragraph 3.23) how Part 3 includes site allocation policies to ensure that the best use of land and optimal capacity of sites is realised. Lewisham Shopping Centre is identified within Site Allocation 2 and is the largest Site Allocation, by some way, within Lewisham’s Central Area.
- 2.2 Within this Section, we comment specifically on the relevant parts of Site Allocation 2 as they are set out in the Reg 19 Plan and their soundness when considering the Council’s evidence base.

### Site Allocation

- 2.3 The allocation comprises Lewisham shopping centre, owned by Landsec, and land outside of the Shopping Centre, including Lewisham House, Lewisham High Street and Lewisham market. Site Allocation 2 (excluding the market) is allocated for comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community, and residential uses.
- 2.4 Landsec support this allocation and whilst the area identified includes land in addition to Lewisham Shopping Centre, it is felt that this is a positive and necessary approach to secure a comprehensive redevelopment of this important 6.38ha town centre site.

### Indicative Development Capacity

- 2.5 The indicative development capacity for the site is proposed as follows.

Table 1: Reg 19 Plan Site Allocation 2 Indicative Capacity

Indicative Development Capacity	Net residential units	Gross non-residential floorspace
	1,579	Employment 20,097 sqm
		Main town centre 60,291 sqm

- 2.6 The Council’s Site allocation background paper (2021) confirms (page 10) that the starting point to establish indicative capacity is informed by the use of a standard methodology. This is based on the density assumptions used in the London-wide SHLAA methodology (2017). For Opportunity Areas, in Central locations with Public Transport Accessibility Levels (“PTAL”) of 4 – 6 (the site’s PTAL is 6b (best)) the London-wide SHLAA density assumptions are 450 dwellings per hectare (“dph”).
- 2.7 The Site allocation background paper then makes reference to a sensitivity analysis to assess whether the baseline capacity figure (standard methodology derived) was feasible and



appropriate to the site context. It is confirmed in Table A.1 (Site development capacity) that the sensitivity analysis was not applied to Lewisham Shopping Centre.

- 2.8 Table 7.1 of the background paper sets out the general assumptions for uses on mixed-use sites. For Lewisham Shopping Centre this proposes Residential – 60%; Main Town Centre – 30%; and Employment – 10%. The footnote goes on to state that this assumption reflects the need for provision of a significant amount of main town centre uses within the Primary Shopping Area, also commensurate with the objective for Lewisham to be designated a Metropolitan centre.
- 2.9 Working this through, 60% of the 6.38ha Lewisham Shopping Centre site is 3.83ha, which at 450 dph would generate 1,724 residential units. This is more than the 1,579 residential units set out in the Indicative Development Capacity.
- 2.10 Table A.2 Delivery assumptions (land use mix by site) then goes on to show, without explanation, the residential proportion of the land use mix for Lewisham Shopping Centre as 55%. Working this through, 55% of the 6.38ha Lewisham Shopping Centre site is 3.51ha, which at 450 dph would generate 1,579 residential units which reflects the 1,579 residential units figure set out in the Indicative Development Capacity.
- 2.11 As we will go on to describe below, we consider that the standard method is too arbitrary for this complex site. It underestimates the potential for new homes on site, and by apportioning 40% of uses to Main Town Centre and Employment uses greatly overestimates the demand for these uses and fails to recognise existing vacancy levels and the objectively assessed needs of Lewisham.
- 2.12 The Council's Residential Density Technical Paper (2020) which was produced to support the sensitivity analysis described above also shows<sup>6</sup> that the residential density of a number of approved schemes within Lewisham's Central Area (which includes the Lewisham Shopping Centre Site Allocation) are well above 450dph. They range from 480 to 670 dph and in some cases up to 1,287 dph. 450dph is considered to be a conservative figure given the centrality of the Lewisham Shopping Centre Site Allocation to the Central Area, and the size of the site to create its own urban character.
- 2.13 Landsec recognised in its Reg 18 representations that the standard methodology described above can act as a starting point for site capacity. However, the final development capacity should be established through a detailed assessment of design, townscape, needs and various other planning matters subject to specific pre-application discussions.
- 2.14 Indeed, the Council has used this approach to inform site capacities elsewhere in the borough.
- 2.15 Landsec considers that since 2020, sufficient discussions have taken place with the Council and stakeholders to inform a site-specific approach to the indicative capacity for Site Allocation 2.

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<sup>6</sup> Residential Density Technical Paper (2020) Figures 2.1 – 2.3

### *Net Residential Homes*

- 2.16 As a PTAL 6 central location, the London Plan encourages much greater residential densification, certainly given the potential for metropolitan status. London Plan Policy H1 Increasing housing supply requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites in order to ensure that housing targets are met. Sites within existing or planned PTALs of 3-6 which are located within 800m of a tube or rail station or town centre boundary are identified as key sources of capacity.

### *Contextual Density Assessment*

- 2.17 Numerically, we consider that the delivery of at least 1,579 homes referred to in the Site Allocation (a gross residential density of 247dha, the lowest of any Lewisham town centre site) comprises an underutilisation of brownfield land. This does suggest that the site allocation underutilises capacity at Site 2 and further design led optimisation is required.
- 2.18 This density would also be substantially below (c.40%) the prevailing densities approved in Lewisham town centre over recent years. Due to the greater level of policy ambition to optimise accessible brownfield sites, and Site Allocation 2 representing the largest and most accessible town centre site for the Council, it would not represent a good use of land to promote residential densities substantially below the prevailing character.
- 2.19 Using gross densities (housing numbers and site area), we have compared Site Allocation 2; a housing proposal of 2,500 homes and 3,000 homes at Site Allocation 2 with other Lewisham town centre permissions, and the Surrey Canal (New Bermondsey) proposal which received a resolution to grant planning permission on 27/1/22.
- 2.20 We have also compared the densities to the former London Plan density matrix which specifically considered appropriate residential densities for central PTAL 6 sites. This guided densities to 405 dwelling per hectare ('dph'). If this density threshold was applied to Site Allocation 2, it would generate 2,584 homes, the density that Landsec propose.
- 2.21 The densities approved by Lewisham Council are generally greater than the densities proposed for Site 2 at 2,500 and 3,000 homes which would adequately support an increased housing capacity of at least 2,500homes .

### *Design Led Optimisation*

- 2.22 Landsec has entered into pre-application dialogue and design review with the Council, Design Review Panel and GLA regarding the design principles for the site. This has included a built heritage and townscape assessment and an assessment of public benefits; regeneration requirements; and site delivery. It is considered that following this design led approach Site Allocation 2 can deliver 2,500 new homes on site.

### *Development Economics*

- 2.23 Residential development performs an integral role for the development economics of the proposal. Unlike other proposals which are subject to cleared, or low intensity land uses, Site Allocation 2 is an extremely complex site. There are numerous existing commercial rights which have been acquired across the site over recent years; 3<sup>rd</sup> party interests; legal interests across multiple levels; and physical overlays of different buildings with different land interests

and structural grids. These existing constraints represent significant abnormal costs in addition to utilities reinforcements, highways works, remediation / asbestos removal, service diversions, demolition / reconfiguration of existing spaces & basements and vacant possession costs.

- 2.24 Further abnormal costs are associated with the phased nature of delivery, a strategy necessary to avoid extensive wholesale demolition which could adversely impact town centre vitality and viability. Whilst a complex issue, abnormal costs do represent a fundamental part of the planning narrative. The Council's own evidence base used to inform the local plan review represents an important baseline to commence this discussion albeit the Council's consultants did not include exceptional costs as this information was not available to them (and the BNPP report acknowledges it is seeking to set a consistent baseline for all sites, prior to allowance for these site-specific costs).
- 2.25 The Lewisham Shopping Centre site does however of course have substantial exceptional / abnormal costs.
- 2.26 On the basis of the Council's own evidence, an allocation of 1,579 homes will prevent any meaningful affordable housing and may risk delivery of the site. A 2,500-home target whilst not achieving a policy compliant level of affordable housing, is evidenced by BNPP's work to be deliverable, once abnormal costs are taken into account and to include the substantial benefit of a meaningful level of affordable homes. This would also represent the appropriate residential density for the site both in terms of guidance and approved new build developments. Numerically it is therefore the appropriate quantum of housing for Site Allocation 2.
- 2.27 Development economics is challenging and continually evolving. Since BNPP issued its evidence base, BCIS indicates a further 5% increase in build costs (representing a £50m additional cost to the scheme based on the BNPP build rates) whilst the sales market has become more challenging. Further viability pressures have arisen with the introduction of the Mayor of London's second staircase requirement and the economic climate has softened, with increased finance costs and risk.
- 2.28 The infrastructure challenges of the site must therefore be recognised in the site allocation.

### Employment

- 2.29 From a review of the evidence base we have not been able to locate the source of the 20,097sqm figure included within the indicative site capacity. We understand that the employment figure includes all the previous B use classes, and as a result office floorspace is removed from the 'main town centre' floorspace requirement. This does result in a degree of ambiguity as it is unclear what office floorspace capacity is expected of a site where there is no expectation for industrial floorspace, as is the case with Site Allocation 2.
- 2.30 However, the figure does not appear to be supported by the evidence based on:
- The 2017 London Office Policy Review included a "composite" projection for the borough, that suggested office floorspace falling by 2,500sqm from 2016-2041. Lewisham centre was categorised as "B", suggesting some new office provision but likely to entail overall net loss of office stock. Table A1.1 of the London Plan (2021) categorises the 'Office Guidelines' for Lewisham as 'C' which relates to protecting small office capacity.

- The Council's 2018 Local Economic Assessment says "Demand for office space in Lewisham is low and is focussed on small spaces (below 5,000 sq ft)", and "not typically considered an office location" (page 46).
- The Council's 2019 Employment Land Study says "demand for office space in Lewisham is relatively weak" (page 25). It notes the trend to concentrate office employment in the CAZ has led to falls in office stock in Lewisham even as the number of residents employed in "office sectors" has increased. It concludes that only 15,000sqm net of additional office stock was needed in total for the whole borough over the period 2018-2038 (para. 6.39). *[our underlining]*
- The evidence base does not take into account the recent changes in the nature of employment space brought about by the shift to hybrid, remote and home working, nor the change in Use Classes Order, and the creation of more flexible E-class.
- We note that Lewisham House, a 12,000sqm office building within Site Allocation 2 has remained vacant for a number of years, and has been subject to four office to dwellinghouse prior approval consents between 2015 and 2021.

2.31 In our opinion it would also be more appropriate to include any requirement for office floorspace within the main town centre capacity to avoid ambiguity within the local plan. It is common ground with the Council there is no requirement for industrial uses within Site Allocation 2.

### Main Town Centre Uses

2.32 In terms of the suggested capacity for main town centre uses (identified to be 60,291 sqm), it is not clear where this figure has been derived. This figure does not appear to be reflective of an evidence base. The Lewisham Retail Impact Assessment and Town Centres Report (dated December 2021) ("RIATCTR") did not assess capacity of individual sites.

2.33 When considering the development capacity of a site, it is important to consider the following:

- Existing use of the site;
- Future demand / capacity; and
- Place-making and design considerations.

2.34 All these factors will impact on the development capacity of a site. However, it appears that none have yet been assessed by the Council in identifying an indicative main town centre uses figure for the site allocation.

2.35 Many of the upper floors (including within the existing retail units) within the shopping centre are not being used or are vacant. This suggests that existing retail units are oversized. For example, M&S and H&M, both of which are located within the Site Allocation, are not utilising their upper floors. This is supported by the CACI and sales density sensitivity assessment.

2.36 In terms of future capacity, the updated evidence published by the Council (RIATCTR) identifies an oversupply of comparison retail floorspace (which will be the focus for growth of higher order centres) by 2035. This represents a notable shift in the findings of the retail evidence informing the earlier Regulation 18 Local Plan. Despite this, the indicative development capacity for the site (at 60,291 sqm) remains identical with that identified in the Regulation 18 Local Plan. The adoption of the same floorspace figure further indicates that this has not been based on any evidence and has not been re-considered by the Council as a

result in of the falling demand for new retail floorspace in Lewisham – as acknowledged by the RIATCTR.

- 2.37 The Council's updated retail evidence demonstrates that the identified oversupply of retail floorspace in Lewisham town centre has increased. Our assessment identifies that within Lewisham town centre there is an oversupply of retail floorspace due to retail capacity and vacancy of c. 17,000 sqm (gross) at 2025, and this is likely to be an underestimate.
- 2.38 The retraction in the retail market (as acknowledged by the Council's own retail evidence) has implications on the future capacity for the site allocation. By overstating the development capacity this has the potential of undermining the long-term vitality and viability of the town centre, by creating vacant floorspace where demand does not exist, and on the overall delivery of the site.
- 2.39 Finally, when considering future development capacity, consideration must be given to place-making and design issues. The existing site comprises built floorspace across most of the allocation giving rise to limited opportunities for permeability and public realm. Consequently, if the wider design aspirations for the site are to be achieved, which includes the reconfiguration of spaces to facilitate a street-based layout with improved permeability with the wider town centre, new and improved public realm it will not be physically possible to provide the same commercial footprint as currently provided as part of redevelopment proposals of the site.
- 2.40 Given this, together with the fact that retail and a number of other main town centre uses do not typically wish to be located on upper floors, the wider design objectives will naturally impact upon the site capacity, despite Landsec seeking to ensure that commercial floorspace is maximised across the whole ground and part upper floors.
- 2.41 Having regard to the above, the indicative capacity figure to provide 60,291 sqm of floorspace for main town centre uses within the site allocation is not justified or compatible with the wider redevelopment aspirations for the site.
- 2.42 Instead, by taking into account all the above factors, we believe that the indicative capacity for main town centre uses should be reduced to c. 40,000 sqm. This represents capacity that is still in excess of the evidence base and is ambitious but could be deliverable and achievable and importantly will realise the wider regeneration benefits associated with the comprehensive redevelopment of Lewisham Shopping Centre.
- 2.43 Submitted under separate cover, Landsec has prepared an updated technical assessment which applies the latest industry forecasts to the Council's retail model to help inform future needs for the town centre.

#### Proposed Modification

- 2.44 The proposed modification to indicative site capacity of Site Allocation 2 is set out at Table 5 below. It seeks an increase in living units of 2,500 homes. It also seeks to remove the employment reference due to ambiguity and revised the indicative capacity to 40,000sqm.

Table 5: Indicative Capacity Proposed Modification

Indicative Development Capacity	Net residential units	Gross non-residential floorspace
	<del>1,579</del> 2,500	<del>Employment 20,097 and</del> Main town centre <del>60,291-40,000</del>

## Site allocation

2.45 The site allocation is supported by Landsec, albeit we consider that reference to student accommodation should be included as follows.

*Comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community, student and residential uses. Redevelopment of existing buildings and reconfiguration of spaces to facilitate a street-based layout with new and improved routes, both into and through the site, along with public realm and environmental enhancements.*

## Opportunities

2.46 Due to the complexities of bringing Site Allocation 2 forward, it is considered necessary to include the following text within the opportunities section of the allocation. We consider that there should be explicit recognition and acknowledgement that policy priorities will need to be balanced to achieve the strategic aims of this town centre regeneration allocation.

*The site is by its nature complex to bring forward and requires significant upfront investment in infrastructure which may impact the viability of development and the ability to achieve other policies of the plan. The Council will take into consideration the viability challenges of the site when assessing the requirements of other policies.*

## Development Guidelines

2.47 We note there are cross references within the site allocation text to other policies within the Reg 19 Plan. The last sentence of Development Guideline 7 states as follows:

*“Tall buildings may be appropriate across the site, especially at the northern end of the site and to the west along Molesworth Street.” [our underlining]*

2.48 We do not consider that the underlined text reflects policy QD4 (Building heights) which identifies that the site is located within a Tall Building Suitability Zone, where tall buildings are appropriate (Part B of the policy). For consistency with policy QD4, the Development Guideline text should be amended as follows:

*“Tall buildings ~~may be~~ **are** appropriate across the site, especially at the northern end of the site and to the west along Molesworth Street.” [our underlining]*

2.49 The final development guideline refers to options for plots of land that do not fall within the ownership of Lewisham Shopping Centre. We comment in Section 11 below on policy DM4 (Land Assembly). To align the development guideline with policy DM4, we consider the following amendments are required:

*“Redevelopment options for the plots of land that do not fall within the ownership of the Lewisham Shopping Centre should be explored, ~~to better integrate them into~~ fully co-ordinated with a comprehensive ~~scheme for~~ approach to the wider site allocation. This includes retail units along Lewisham High Street, and the Lewisham House block where the principle of land use has already been established through the prior approval process.”*

## 3 Chapter 5 - High Quality Design

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- 3.1 To remain in general conformity with the London Plan (LP Policy D9), Lewisham Council has prepared its evidence base to support the location of tall buildings in the borough. LP Policy D9 requires 'appropriate' tall building heights to be identified on maps. Paragraph 3.9.2 of the London Plan suggests that boroughs should determine the maximum heights that could be acceptable, however it is widely recognised across many London borough local plan reviews that it is simply impossible for a Council to prescribe rigid maximum building heights with any degree of accuracy. This is because Councils do not have the capability or evidence base to undertake detailed site-specific design, townscape and heritage assessments and are unable to take into account all of the planning judgements required to inform maximum building heights (outside of the planning application process). It is therefore necessary to ensure flexibility within the plan.
- 3.2 Landsec supports the Council's recognition that development proposals may come forward for building heights above the indicative maximums, and where building heights depart from the parameters set by the Local Plan they will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development<sup>7</sup>.

### Draft Policy QD4 Building Heights

- 3.3 The Reg 19 tall building policy (QD4) proposes a significant change to the Reg 18 Plan. It moves away from a 'Tall Buildings suitability plan' (which identified at a borough wide level those areas that were 'less suitable' to 'more suitable' for tall buildings), to a 'Tall Building Suitability Zone' which specifies the location and maximum storey height for each zone.
- 3.4 As explained in Landsec's representations on the Regulation 18 Plan consultation, Lewisham Shopping Centre performs excellently when considered against the criteria set out in the Council's Tall Buildings Study (2021) for determining the appropriate scale and location of tall building in Lewisham:
- High PTAL – PTAL 6;
  - Proximity to Bakerloo Line Extension – Adjacent to transport cluster;
  - Town Centre location – Located in a major town centre and potential for Metropolitan town centre classification;
  - Opportunity area location – Located in an Opportunity area;
  - Growth area location – Located in a Growth area;

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<sup>7</sup> Reg 19 Plan 5.35



- Characterised by building height and tall building clusters – Located in an existing tall building cluster;
- Proximity to Green and Open Space – Close to Green/Open Space;
- Good Cycling Transport Accessibility Level – Benefits from a reasonable level of accessibility to railway and London Underground stations by cycling;
- Site allocation – It is an allocated site;
- Outside a World Heritage Sites and Buffer Zone – Located outside World Heritage Site and Buffer Zone;
- Outside a Conservation Area – Located outside a Conservation Area;
- Outside an Area of Special Local Character – Located outside an Area of Special Local Character;
- Listed Buildings – Does not contain any listed buildings;
- LVMF viewing corridor and consultation areas – Outside the LVMF viewing corridor and consultation areas;
- Local landmarks and local view buffers – Outside the local landmarks, local views and local view buffer;
- Varied Surrounding Building Heights – Lewisham has one of the widest spectrums of building heights; and
- Lower ground (topography) – The site is located on areas of lower ground therefore is less sensitive to the impacts of tall building proposals

3.5 It is therefore common ground that Site Allocation 2, and specifically Lewisham Shopping Centre is a suitable location for tall buildings. Landsec are concerned however that the Plan does not yet accurately reflect the High Court judgement on LP Policy D9 (part B of QD4); fails to accurately reflect the correct floor to floor heights of town centre developments (part C of QD4); and does not reflect national policy on heritage assets (part D of QD4). We are also concerned that the proposed maximum heights for Site Allocation 2 (Figure 5.5 and Schedule 12) do not represent the opportunity for building heights presented in detailed pre-application discussions and the Council's own evidence base.

3.6 We comment on these matters further below.

### Part B

3.7 To align Policy QD4 (Building heights) with London Plan policy D9 (Tall buildings) and its application<sup>8</sup>, which does not preclude tall buildings coming forward outside of identified tall

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<sup>8</sup> London Borough of Hillingdon, R (On the Application Of) v Mayor of London [2021] EWHC 3387 (Admin) (15 December 2021)

building locations, Part B should be amended so that it is consistent with regional policy and therefore sound as follows:

*“Tall buildings should ~~only~~ be developed in locations identified as appropriate for tall buildings on the Policies Map (i.e. Tall Building Suitability Zones). Development proposals for tall buildings outside of these zones will be resisted, except where the development is adjudged to be acceptable having regard to any adverse visual, functional, environmental and cumulative impacts in accordance with London Plan policy D9(c).”*

3.8 As the Reg 19 Plan wording currently stands, there is also a contradiction between Parts B and D of policy QD4. Part D of policy QD4 states that development proposals for tall buildings will only be permitted where they are in a Tall Building Suitability Zone.

3.9 To align Parts B and D of policy QD4, Part D should be amended as follows:

*“Development proposals for tall buildings ~~will only be permitted~~ should normally be developed where they are in a Tall Building Suitability Zone, align with the appropriate height ranges set out above and it is demonstrated that the development.”*

### Part C

3.10 Part C of QD4 includes maximum building heights in metres and in storeys. The maximum building heights, for example for Lewisham Town Centre 52m to 112.8m, have been derived from the Council’s evidence base, the Allies and Morrison Tall Building Addendum May 2022.

3.11 This assumes<sup>9</sup> that typical heights of ground floors will be 4 metres and heights of upper floors will be 3.2 metres. Landsec’s design team have been working on design proposals for the town centre and this analysis, and the contextual analysis of other town centres, indicates that ground floor heights will be greater than 4m, and 5.8m is normally proposed to deliver high quality retail space, the requirement of retailers, back of house and servicing requirements. Similarly, residential upper floors are 3.25m and plant 4.5m to allow for brick construction, approved document L (conservation of fuel and power), O (overheating) compliance and energy strategies. This results in less floors being delivered as a result of the metric threshold in part C which would in turn impact deliverability. As the evidence base only uses “typical” floor storey heights **we suggest that the heights in metres be removed from QD4, particularly as these are not carried through into Figure 5.5 or Schedule 12.**

3.12 Text should be added to the end of Part C of policy QD4 as follows:

*“Where proposals for tall buildings exceed the height criteria set out above, they will only be permitted where the development is adjudged to be acceptable having regard to any adverse visual, functional, environmental and cumulative impacts in accordance with London Plan policy D9(c).”*

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<sup>9</sup> Allies and Morrison Tall Building Addendum May 2022 paragraph 2.5.6

### Figure 5.5 and Schedule 12 (Tall Building Suitability Zones)

- 3.13 Despite the assessment undertaken by the Council regarding the exceptional suitability of Site Allocation 2 for tall buildings, we note that the maximum storey height identified is 25 storeys (Figure 5.5 and Schedule 12).
- 3.14 This is despite the Council recognising that the site forms the heart of Lewisham major centre (Reg 19 Plan para. 14.28), and that Lewisham Gateway (directly opposite the shopping centre to the north) is identified for 35 storeys. Parts of North Deptford, which are less suitable using the Council's criteria-based assessment include zones of 35, 45 and 48 storeys and parts of Deptford Creekside which has a zone of 30 storeys.
- 3.15 The Council's 'Tall Buildings Study Addendum (May 2022)' introduced maximum building heights for different areas of the borough. Landsec submitted representations to this document on 9<sup>th</sup> June 2022. Having regard to the analysis undertaken in Figures 50 – 57 of the Tall Buildings Study Addendum which consider matters such as accessibility, town centre/opportunity area location and combined suitability, we consider that there is nothing to distinguish why the Lewisham Shopping Centre site should have a maximum height parameter (25 storeys as identified in 'Zone B') that is materially less than the northern part of the town Centre (35 storeys as identified in 'Zone A'). Figure 59 of the Addendum shows a level of sensitivity on some parts of Lewisham High Street, however this is accounted for in the Addendum by removing the High Street from the area where tall buildings may be appropriate, and this is reflected in Figure 5.5.
- 3.16 Whilst we acknowledge the transitional role that Lewisham Shopping Centre is envisaged to play, the Lewisham Shopping Centre Site Allocation text (Development Guideline 7) only applies this directly to the southern end of the site. The Council's 'Tall Building Review Background Paper – January 2023' also refers to the site performing a transitional role (page 12):
- “Deep site with constraints arising from existing structure. The site has to form a transition between the northern cluster of tall buildings focused around the station to the existing low rise context of the high street. Could support a cluster of towers up to max.25 storeys focused towards Molesworth Street and to the north of the site.”*
- 3.17 However, we would disagree that a reduction from 35 storeys on the Lewisham Gateway site, as shown on Figure 5.5 of the Reg 19 Plan, to 25 storeys across the road on the Lewisham Shopping Centre site would form the basis of a successful transition. We also note that paragraph 4.33 of the Tall Building Review Background Paper draws from the Reg 19 Plan when stating:
- “There are significant site redevelopment opportunities, including the 1970s built shopping centre and multi-storey car park, which alongside planned public transport improvements, will allow the character of Lewisham to be ‘reimagined’.” [our underlining]*
- 3.18 We consider that the transition can be appropriately managed with a reduction to max. 30 storeys parameter as has been demonstrated in the detailed townscape and heritage analysis undertaken by Landsec in respect of its emerging proposals.

- 3.19 The urban design characteristics of the northwest of Lewisham Shopping Centre and along Molesworth Street are very similar to the Lewisham Gateway site and land around the transport interchange, the reallocation of these areas within Zone A would ensure greater consistency between the zonal allocation and the evidence base. This would also reflect the opportunity for signature buildings and a clustering of buildings at the taller range. It would also facilitate the implementation of the Lewisham Shopping Centre site allocation which would require some buildings taller than 25 storeys.
- 3.20 Additionally, we recognise that the tall building zone has been intentionally pulled away from Lewisham High Street along the eastern edge of the Lewisham Shopping Centre site, albeit Figure 5.5 now pulls the tall building zone further back from the Tall Building Evidence Base diagram figure 61 without justification. It appears that the tall building zone follows the alignment of back of house service yards, rather than the rear of high street.
- 3.21 Whilst Landsec welcomes the relief, and the approach partly reflects the design analysis undertaken as part of Landsec's High Street studies, we consider that the tall building suitability zone boundary should be revised to include land opposite Lewisham Gateway (northeast of the Lewisham Shopping Centre site allocation) and land at the southern tip of the site allocation which is bound by the High Street and Molesworth Street. These modifications are supported by the granular study of the Lewisham Shopping Centre site that has been presented during pre-application discussions regarding the redevelopment of the site. The analysis highlights the ability of the site to accommodate change, including the ribbon of rail and road infrastructure that lies to the west of the site that provides a natural physical and visual buffer, and the existing and emerging tall and coarse grain development located to the north and west of the site. It also highlights the benefits of redeveloping at greater height may afford, thereby freeing up more space at ground floor that would maximise town centre uses and create new publicly accessible space whilst being complementary to the surrounding townscape.
- 3.22 The approach also facilitates regeneration and manages future growth, makes optimal use of the capacity of the site which is well-connected by public transport and has good access to services and amenities. It also emphasises the hierarchy of Lewisham's main centre of activity, an important street junction as well as the transport interchange.
- 3.23 We consider that Figure 5.5 and Schedule 12 should be revised to reflect pre-application discussions and to refer to **Max 30. The tall building zone should include land on the northeast corner of Site Allocation 2 and be revised to align with Figure 61 of the Tall Building Evidence Base (2022) along the eastern boundary with the High Street**

#### Part D

- 3.24 Finally, Part D (g) of policy QD4 states that development will preserve or enhance the significance of heritage assets and their setting. This is not consistent with London Plan policy D9 (c) 1d) or national policy which sets out criteria for where harm to heritage assets is identified. Part D (g) of policy QD4 should be updated to reflect the London Plan policy text and national policy, in particular paragraph 202.

### View management

- 3.25 Part C of policy QD5 (View management) states that development proposals must not harm and, wherever possible, seek to make a positive contribution to the characteristics and

composition of London Strategic Views and Lewisham Local Views. This is inconsistent with London Plan policy HC4 (London View Management Framework) which in Part A states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

- 3.26 Policy QD5 should therefore be amended as follows so that it aligns with regional policy and is sound:

*“Development proposals ~~must~~ should not harm and, wherever possible, seek to make a positive contribution to the characteristics and composition of London Strategic Views and Lewisham Local Views...”*

### Optimising site capacity

- 3.27 Part C of policy QD6 (Optimising site capacity) states where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above. However, paragraph 13.8 of the Reg 19 Plan states:

*“Each site allocation includes information on the development capacity of a site for different types of land uses. The process for identifying sites and the methodology used for setting capacity figures are set out in the “Lewisham Local Plan: Site Allocations Background Paper” – this should be referred for further information. The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.” [our underlining]*

- 3.28 Policy QD6 therefore appears to give the indicative capacity a weight in policy that is not consistent with other parts of the Reg 19 Plan and was never envisaged by the Site Allocation Background Paper which in paragraph 6.2 states:

*“The indicative capacities should not be read prescriptively. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process.”*

- 3.29 Part C of policy QD6 should therefore be deleted. Site Constraints and Scheme Viability should also be added to the list of criteria set out under Part B of the policy.

## 4 Chapter 6 - Heritage

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### Non-designated heritage assets

4.1 Policy HE3 (Non-designated heritage assets) sets out criteria for locally listed buildings and other non-designated assets as follows:

*“A Development proposals will only be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset’s setting. In particular, proposals for the sensitive retention, refurbishment and appropriate re-use of non-designated assets will be considered favourably.”*

*“B Proposals that unjustifiably harm the significance of a non-designated heritage asset and its setting will be refused.”*

4.2 There is a contradiction between parts A and B where part B accepts that there can be harm (where justified) to the significance of a non-designated heritage asset, whereas part A requires the preservation or enhancement of a non-designated heritage asset for development to be supported.

4.3 Similarly, Part D(b) states that within Areas of Special Local Character development proposals must:

*“Secure the retention of unlisted buildings where these contribute positively to the local distinctiveness of the area.”*

4.4 These approaches are not consistent with national policy. Paragraph 203 of the NPPF states:

*“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

4.5 The requirements of policy HE3 go far beyond the requirements of national policy which clearly recognise there is a balance to consider when assessing the impact of an application on a non-designated heritage asset. There is no reference to preservation or enhancement in paragraph 203 of the NPPF. This inconsistency between Parts A, B and D of policy HE3 and paragraph 203 of the NPPF mean that the policy is unsound. These parts should be redrafted to reflect NPPF policy.

# 5 Chapter 7 - Housing

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## Introduction

- 5.1 Chapter 7 of the Reg 19 Plan contains key policies on housing, focusing on securing more genuinely affordable homes, boosting housing delivery and tailoring housing to local communities. Landsec strongly supports the overarching aims of the policy to significantly increase housing delivery and focus efforts to do this within sustainable, well-connected locations.

## Affordable Housing

- 5.2 Landsec agrees that for genuinely affordable housing (i.e. London Affordable Rent / Social Rent) residents should be provided with lifetime tenancies (Para. 7.24). Landsec seeks clarification that this does not apply to intermediate tenures which cannot have the same tenancy agreements as social rent (but do of course have other tenancy protections governed by separate law and policy). Landsec proposes the following amendment to Paragraph 7.24:

*“7.24 ... For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity.”*

- 5.3 Landsec agrees that Shared Ownership housing costs should be demonstrably affordable (Para. 7.34). Landsec notes that Shared Ownership income thresholds should be linked to the London Plan and London Plan AMR. The London Plan AMR states in paragraph 3.74 that the Shared Ownership income threshold will be reviewed / updated on an annual basis. It also considers that the affordability calculation be aligned to the formula in the London Plan AMR (annual housing cost should be no greater than 40% of a household's net income). Landsec proposes the following amendment to Paragraph 7.34 to align with regional policy.

*“7.34 ... Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable. The affordability threshold for intermediate tenures should be aligned to the London Plan Annual Monitoring report which is updated annually. For dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of a household's net income.”*

- 5.4 Landsec agrees that the mix of types and tenures should be assessed on a case-by-case basis (Part E of policy HO1 – Meeting Lewisham's housing needs). Landsec is however concerned that Table 7.1 is overly prescriptive in terms of the unit type mix for affordable homes. In particular the table / H01 E (c) wording does not acknowledge the importance of affordability and market demand for intermediate homes. These factors may mean that in some areas demand does not exist for the proposed 50% 3 and 4 bed homes within the intermediate component. Landsec proposes the following amendment to H01 E (c):

*“The need to secure provision of a mix of unit sizes to meet local need, with reference to the target unit size mix for affordable housing set out Table 7.1 and accounting for market demand and affordability for different types of intermediate homes within the local area”*

## Student Accommodation

5.5 Landsec supports the inclusion of a specific policy (HO7) for purpose-built student accommodation ("PBSA").

5.6 Part A (b) of policy HO7 states that PBSA will only be supported where it is demonstrated that:

*"The accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education provider(s);"*

5.7 We consider that the agreement occurs at the point of occupation not planning application as set out at supporting text at paragraph 4.15.3 of the London Plan *"the borough should ensure, through condition or legal agreement, that the development will, from the point of occupation, maintain a nomination agreement or enter a new nomination agreement with one or more higher education provider(s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation. There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed."*

5.8 This goes beyond Part A 3) of London Plan policy H15 (Purpose-built student accommodation) which states:

*"the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider" [our underlining]*

5.9 In order to be consistent with the London Plan and therefore sound, Part A (b) of policy HO7 should be replaced with the London Plan policy text.

5.10 Landsec supports the definition of affordable student accommodation being aligned to the London Plan at Policy HO7 A (c). It is however proposed that the ability for a student led scheme to be 'Fast Track' is included in the main policy text. The London Plan (Policy H15) states

*"to follow the Fast-Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land"*

5.11 Landsec proposes an amendment to draft Policy HO7 A (c) as follows:

*"A (c) The maximum level of accommodation is secured as affordable student accommodation, in line with the London Plan and including the ability to follow the Fast-Track route (London Plan Policy H15, Purpose-built student accommodation)."*

5.12 Part B (c) of policy HO7 gives priority to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions in the Borough. This is not aligned with policy H15 Part B of the London Plan which states:



*“Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.”*

5.13 Part B (c) of policy HO7 is therefore not sound and should be removed.

5.14 The Reg 19 Plan has also introduced a requirement in Part C (a) of policy HO7 of a recommended benchmark of 1 square metre of internal and 1 square metre of external communal amenity space per student bed. There is no such benchmark within London Plan policy and we have found no consideration of the introduction of such a benchmark within the Council's evidence base or upon scheme viability or deliverability. The benchmark should therefore be removed from the policy.

## 6 Chapter 8 - Economy and Culture

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### Workspace

6.1 Part B of policy EC3 (High quality employment areas and workspace) states:

*“Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) must include a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises.” [our underlining]*

6.2 Supporting paragraph 8.20 sets out how the 2,500 sqm benchmark is established by the London Plan and given effect through London Plan policy E2. However, Part D of London Plan policy E2 (Providing suitable business space) states:

*“Development proposals for new B Use Class business floorspace greater than 2,500 sq.m. (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.” [our underlining]*

6.3 In order to be consistent with the London Plan and therefore sound, the “must include a reasonable proportion” in policy EC3 needs to be amended to “should consider the scope to provide a proportion”.

6.4 The first part of part D of policy EC4 (Low-cost and affordable workspace) states:

*“New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses must make provision for affordable workspace. Developments must provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site.” [our underlining]*

6.5 The Council’s Local Plan Viability Assessment (May 2022) considers the provision of affordable workspace within schemes and concludes on page 63:

*“we have tested emerging requirements on schemes which provide new or replacement B1 floorspace at 10% and 20% of floorspace with the discounts of 20%, 30%, 40% and 50% of market rent. The results of our analysis indicate that a requirement for 20% of floorspace discounted by up to 50% of market does not have a significant bearing on the viability of the schemes tested. However, the precise impact on individual schemes will depend on scheme-specific composition, including the extent of other floorspace which is not discounted. The affordable workspace policy will therefore need to be applied with a degree of flexibility, including having regard to site-specific viability issues that may emerge on individual schemes.” [our underlining]*

6.6 Policy EC4 does not however offer any flexibility in how it is applied. In order to be consistent with the evidence base and justified, the policy should be amended as follows:

*“New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses ~~must~~ **should** make provision for affordable workspace. Developments ~~must~~ **should** provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents **having regard to site-specific viability issues that may emerge on individual schemes.** Affordable workspace should be provided on-site.” [our underlining]*

## Retail

- 6.7 Landsec has provided context to its representations within the Quod Technical Retail Report submitted under separate cover. It has been identified that the Reg 19 Plan (paragraph 8.70) may overstate the future retail capacity in the borough by not identifying an oversupply of comparison retail floorspace (of 3,651 sqm) and reporting a perceived need in the convenience retail sector.
- 6.8 This lack of capacity for additional comparison retail floorspace provides important context when considering the strategic approach to the Local Plan and specific policies.
- 6.9 Overall, the updated assessment identifies an oversupply of retail floorspace (both convenience and comparison) for Lewisham town centre of 5,544 sqm (gross) by 2035. This oversupply occurs even before taking into account existing vacant and underutilised floorspace within Lewisham town centre.
- 6.10 It is within the context of an oversupply of retail floorspace and a high level of vacancies that local planning policy should be developed in order that the Council's approach to town centres is effective and justified, and therefore sound. Future planning for town centres should seek to reduce existing vacant and underutilised space, rather than promote delivering additional or retaining large levels of retail floorspace in a contracting market.

### Policy EC11 – Town centres at the heart of our communities

- 6.11 Policy EC11 reflects the approach of the London Plan and national policy in seeking to focus development on existing town centres.
- 6.12 The policy highlights that town centres will be managed positively to ensure they are attractive and vibrant places that are resilient and adaptable to future challenges. Landsec supports this approach.
- 6.13 The supporting text to this policy highlights that there is a need for town centres to remain resilient and adaptable to the challenges and opportunities facing the High Street, including changes in consumer behaviour and business practices. In particular, Paragraph 8.61 goes on to acknowledge that:

*“This is particularly in terms of the retail sector where Covid-19 has led to a spike in town centre vacancies and accelerated trends in multi-channel (online shopping). Whilst recognising that town centres play a key role in the provision of local shops and services, it is important, that they are able to evolve and adapt over time, so that they continue to support our*

*neighbourhoods and communities. The Local Plan provides support for a wide range of uses to locate within town centres as diversification is vital to their revitalisation, adaptability and long-term resilience.”*

- 6.14 Such a flexible approach for town centres is supported by Landsec, so too is the recognition that town centres need to evolve in light of a changing retail landscape – as illustrated by the retail evidence and updated assessment undertaken. The Council should strengthen this objective through the site allocations and town centre policies.
- 6.15 To achieve the long-term vitality and viability of Lewisham’s town centres, policy EC11 states that this will be secured through a number of measures. This includes delivering an appropriate mix and balance of residential and main town uses to attract visitors and ensure people have good access to a competitive range of services and facilities by seeking to define a broad range of matters that comprise vitality and viability. The policy also recognises that there is a need to ensure that town centres remain resilient and adaptable to change over the long-term.
- 6.16 Within this context, whilst protecting the retail function of the Borough’s town centres is crucial, the ability for town centres to evolve and adapt over time, so that they continue to support the communities in which they are situated is welcomed.

#### *EC12 – Town centre network and hierarchy*

- 6.17 Policy EC12 seeks new development to support and reinforce Lewisham’s town centre network and hierarchy.
- 6.18 This Policy specially refers to the Borough’s future need by 2035 for 8,400 sqm (gross) of additional retail floorspace to be met, and that this should be focused on Lewisham and Catford major centres in the first instance.
- 6.19 The supporting text to this policy (paragraph 8.70) outlines that this floorspace requirement is derived from the findings of the RIATCTR. For all the reasons identified, the RIATCTR overstates the level of retail capacity for Lewisham, and the forecast needs identified within the Local Plan needs to be updated. Policy should seek a consolidation of floorspace and diversification of the overall offer of Lewisham town centre.
- 6.20 Notwithstanding our fundamental concerns with the robustness of the Council’s evidence base, the Council’s own evidence suggests that there is an oversupply of comparison goods floorspace – of more than 3,650 sqm (before taking into account existing vacant floorspace) – and that any retail need falls in the convenience retail sector only.
- 6.21 The identified oversupply needs to be reflected within the Local Plan and by the policy approach for existing centres, including for Lewisham town centre<sup>10</sup>.
- 6.22 Furthermore, part G of draft Policy EC12 needs to be amended to reflect the position of the London Plan and refer to the ‘potential’ future reclassification of Lewisham as a Metropolitan Centre.

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<sup>10</sup> As set out at Table 8.4 of the Regulation 19 Local Plan

*“EC12(F) Development of Lewisham town centre and its surrounds will be proactively managed in order to secure its **potential** future reclassification as a Metropolitan centre....”*

#### *EC13 - Optimising the use of town centre land and floorspace*

- 6.23 Policy EC13 refers to the need for development proposals within and at edge-of-centre locations to optimise the use of land and floorspace through delivering new mixed-use schemes. Landsec supports this approach.
- 6.24 However, Part B of this Policy goes on to states that mixed-use development proposals within town centres will be considered having regard to the impact on the town centre vitality and viability.
- 6.25 Effectively the wording of draft Policy EC13 requires an assessment of impact to be undertaken in support of ‘in centre’ proposals. This is fundamentally inconsistent with national planning policy which recognises the need for greater flexibility in the reuse of town centre floorspace. Both national policy and the London Plan is clear in stating that ‘impact’ is only a policy consideration for retail and leisure development located outside a town centre<sup>11</sup>.
- 6.26 Against this background, the wording of Policy EC13 should be revised so that consideration on the impact on town centre vitality and viability should only be for mixed-use development proposals in edge or out-of-centre locations. Proposed amended wording is provided below:

*“B Within ~~town centre and~~ edge and out-of-centre locations, mixed use development proposals (including the expansion, reuse or reconfiguration of existing floorspace) will be considered having regard to:*

- a. ~~The role and function of the centre;~~*
- b. Impact on town centre vitality and viability;*
- c. Compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character; and*
- d. Compliance with other policies.”*

- 6.27 Also, consistent with the NPPF (paragraph 86), this Policy includes additional wording acknowledging that residential development often plays an important role in ensuring the vitality and encourage residential development on appropriate sites.
- 6.28 Within this context, we believe that draft Policy EC13 is not justified, effective or consistent with national policy and therefore unsound, and should be re-drafted in line with the comments above.

#### *EC14 - Major and District Centres*

- 6.29 Policy EC14 establishes policies for the Primary Shopping Areas (‘PSA’), the locations where retail uses are concentrated.

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<sup>11</sup> Framework paragraph 90

6.30 As currently drafted, this Policy requires development proposals within existing centres to demonstrate how they will support the vitality and viability of the town centre. Again, such an approach is at odds with national policy and the London Plan.

6.31 Likewise, other parts of this Policy require certain criteria to be met when considering development proposals within town centres, and the PSA. This includes the following:

- Part C, which identifies that a Shopping Area Impact Statement will be required where development proposals for Class E and main town centre uses do not contribute to the retail function of the PSA.
- Part D of this Policy goes on to state that within Lewisham Major centre, development proposals should support the role and function of the centre by contributing to the target for the PSA to maintain a minimum of 50% of retail uses as a proportion of all units.
- Part F, identifies that planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the PSA. It goes on to state that evidence of marketing will be required for development proposals seeking a change of use from retail to another main town centre use.
- Part G states that proposals for residential units on the ground floor level or below, both within the PSA and the wider town centre area, are inappropriate and will be strongly resisted.

6.32 Such an approach provides little flexibility in the re-use or redevelopment of underutilised or vacant floorspace, is inconsistent with the position now being adopted by Government, and the Framework. The Framework is clear in recognising that residential development can play an important role in ensuring the vitality of town centres.

6.33 The overall thrust of Policy EC14 is at odds with national policy and the London Plan, where both recognise ‘town centres’, including the PSA, as appropriate locations for ‘main town centre uses’ and not just retail. National policy<sup>12</sup> recognises that town centres should grow and “*diversify in a way that can respond to rapid changes in retail and leisure industries, allows a suitable mix of uses (including housing)*”.

6.34 The Framework<sup>13</sup> goes on to state that planning policies should:

*“recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites”.*

6.35 The London Plan (Policy SD6) also reinforces the need to promote and enhance town centre vitality and viability. Specifically, it recognises that “*the adaption and diversification of town centres should be supported*” in response to changing shopping patterns. Policy SD6 also refers to the importance of introducing new homes into town centres.

6.36 Further reflecting the changing retail sector, the Government announced significant changes to the Use Classes Order, which came into effect in September 2020. This incorporated a number of ‘main town centre uses’ within the same Use Class (Class E). The driving rationales

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<sup>12</sup> Paragraph 86

<sup>13</sup> *Ibid*

for the Government making these changes was to enable flexibility and for town centres to adapt to a changing market.

- 6.37 It is within this national and strategic context that policies within the Local Plan should be prepared. Whilst elsewhere in the Local Plan, it is recognised that town centres need to be more resilient and adaptable to future changes (e.g. Policy EC11) the approach of the Policy EC14 is contrary to this important objective, and the main thrust of the NPPF and the London Plan in allowing town centres to adapt.
- 6.38 The need for flexibility within town centres is particularly significant for Lewisham town centre given the identified oversupply of retail floorspace and the substantial quantum of existing vacant floorspace.
- 6.39 It is therefore essential that policies are flexible and allow the town centre to diversify and adapt. The approach of Policy EC14 is one that may stifle flexibility and will not enable Lewisham town centres' long-term vitality and viability to improve. Instead, it will maintain the *status quo* of a centre through preventing the diversification of the town centre in a contracting retail market.
- 6.40 Policy EC14 is not deemed to be effective or justified and should be removed or re-drafted to enable the flexibility required to ensure town centres, including Lewisham town centre, can adapt. This will include removing the need to undertake a Shopping Impact Statement for 'in centre' proposals and the target to achieve 50% threshold for Class E(a) uses. Neither is justified.
- 6.41 Main town centre uses are supported in town centre locations, as reflected by the NPPF and the London Plan, being identified as the most appropriate location. The approach of Policy EC14 restricts the ability for town centre uses to be located within such locations.
- 6.42 Lewisham town centre, and in particular Lewisham Shopping Centre and the wider Site Allocation 2, is currently heavily focused on the retail sector, with limited wider town centre uses. However, the approach of the retail policies within the Reg 19 Plan will prevent this diversification. Such an approach is contrary to the retail evidence, which supports the need to consolidate and rationalise Lewisham town centre's retail offer, moving away from a retail focus – as is currently the case – introducing other uses that will improve its vitality and viability, which will include residential uses.
- 6.43 The proposed approach of Policy EC14 is also at odds with the advice contained within the RIATCTR (paras. 5.40 to 5.48). This evidence specifically considered four broad policy options that should be considered. These comprise the following:
- **Option 1:** Strengthening policies to provide more control over the loss of retail and service uses. This would usually involve extending the PSA and / or increasing the restrictions on uses permitted;
  - **Option 2:** Retaining the existing approach to control the mix of uses;
  - **Option 3:** amend policies to allow a more flexible approach to enable more non-town centre uses. This would usually involve reducing the PSA and / or introducing more flexibility; or

- **Option 4:** a laissez-faire approach that does not seek to protect retail and town centre uses, on the basis that the market will determine the appropriate mix of uses within town centres.

6.44 In considering these four options, the RIATCTR (para. 5.42) advised that:

*“Considering current and likely future market trends, the updated (lower) retail floorspace capacity projections, and changes to the UCO [Use Classes Order] and permitted development rights described earlier, Options 1 and 2 are unsound and unimplementable approaches for existing premises.”*

- 6.45 Despite this, policies within the Reg 19 Plan have evolved from the earlier Regulation 18 version to place further restrictions on flexibility and the ability for town centres to adapt and change. This is despite the Council’s updated retail evidence (the RIATCTR) now identifying significantly less retail capacity for additional retail floorspace, including an oversupply of comparison retail floorspace. The Council’s own evidence acknowledges that not providing the necessary flexibility could lead to an increase in vacancies within town centres.
- 6.46 Whilst the RIATCTR suggests that such controls are unsound and unimplementable for existing premises, this also applies for new development proposals. Given the available retail evidence and the reduced demand for traditional bricks and mortar floorspace, together with the approach supported by the NPPF and the London Plan, policies should provide greater flexibility. This is not the case in the Regulation 19 Local Plan. Instead, policies, including Policy EC14, seek to limit flexibility and will not enable Lewisham town centre (and other centres in the Borough) to adapt and change in a retracting retail market.
- 6.47 It is also notable that the supporting text (paragraph 8.71) recognises that RIATCTR recommends that the priority should be given to the re-occupation of vacant units to meet the retail floorspace needs, this is not recognised by the policy approach of the Council or in the floorspace need figures referred to within the Reg 19 Plan. Instead, the approach of the Reg 19 Plan seeks to encourage more retail floorspace and no flexibility, despite such an approach not being supported by evidence. Future planning policies for town centres should seek to reduce existing vacant and underutilised space, rather than delivering more floorspace – particularly where a need is not demonstrated – as is the approach of the Regulation 19 Local Plan.
- 6.48 As currently drafted Policy EC14 is not sound and effective and is inconsistent with both the NPPF and the London Plan. It therefore needs to be substantially revised to enable flexibility for town centre to adapt and change.



# 7 Chapter 9 - Community Infrastructure

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## Community Infrastructure

- 7.1 Part E (g) of policy CI3 (Sports, recreation and play) states that all play space and provision for informal recreation must be designed to site outdoor communal amenity and play spaces at the street level or ground floor of development, avoiding the use of rooftops and mezzanines. We suggest that the policy should introduce flexibility to recognise that in some circumstances, such as town centre development, multi level open space, recreational space and play space is an important and necessary component of town centre vitality and viability, and can contribute successfully towards residential amenity.

## 8 Chapter 14 - Lewisham Central Area

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### Lewisham major centre and surrounds

8.1 Part J of policy LCA2 (Lewisham major centre and surrounds) states:

*“To ensure Lewisham Major Centre maintains its role as one of the Borough’s principal commercial and employment locations, development proposals must retain or re-provide existing workspace, and deliver net gains in industrial capacity wherever possible.” [our underlining]*

8.2 This has no regard to policies in Chapter 8 of the Reg 19 Plan (Economy and Culture) which set out criteria for where reductions in employment floorspace might be acceptable (policy EC8). It is a broad statement which provides no opportunity to assess its applicability to individual sites, where for instance there has been long term vacant employment floorspace.

8.3 As described in Section 4 above the Council’s evidence base describes the weak demand for office space in Lewisham.

8.4 Part J of policy LCA2 introduces unnecessary inflexibility, is not supported by the evidence and is a matter that should be addressed in other Chapters of the Reg 19 Plan. Part J should be deleted.

# 9 Chapter 19 – Delivery and Monitoring

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## Masterplans and Comprehensive Development

- 9.1 Part B of policy DM3 (Masterplans and comprehensive development) states that where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development.
- 9.2 This goes beyond any requirement of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). Article 7 (3) states that except where article 5(3) applies, an application for outline planning permission does not need to give details of any reserved matters (article 5(3) relates to where access is a reserved matter).
- 9.3 Given this conflict with the Statutory Instrument, part B of policy DM3 should be amended as follows:

*“The site masterplan must be submitted at the outline or full planning application stage. ~~Where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development.~~ The masterplan will be required to comprise of:*

## Land Assembly

- 9.4 A review of policy DM4 (Land assembly) has been undertaken in the context of the Town and Country Planning Act compulsory acquisition of land and legal requirements for this. The following amendments are proposed to ensure consistency with the Act.

*A To enable the delivery of the Local Plan and the spatial strategy for the Borough the Council will support land assembly to achieve ~~comprehensive~~ development, where appropriate. The Council will consider the use of its compulsory purchase powers, ~~only where necessary,~~ to assemble land for development within the Borough where there is a compelling case in the public interest to do so and where:*

*a. Landowners and/or developers, as appropriate, can demonstrate that: ~~there is a deliverable development proposal that will contribute to the achievement of the economic, social or environmental well-being of the area, or~~*

*~~i. There is a viable and deliverable development proposal that appropriately satisfies the Local Plan requirements; and~~*

*~~ii. They have made all reasonable efforts to acquire, or secure an option over, the land and/or building(s) needed, through negotiation.~~*

*b. A ~~comprehensive~~ approach to redevelopment of the assembled site ~~is necessary to~~ will deliver a strategic site allocation contained in the Local Plan (including the requirements of a masterplan where required) in a manner that delivers public benefit, ~~and~~ or*

*c. The development proposal for the assembled site will contribute to the delivery of the spatial strategy for the Borough, having particular regard to the Vision and place principle policies for the area within which the development is located.*

*And where reasonable efforts have been made to negotiate with the landowners and occupiers of the relevant land.*

~~*B Where compulsory purchase is necessary, and determined to be an appropriate option for securing development that supports the delivery of the spatial strategy, applicants will be required to demonstrate how the associated costs will impact upon development viability.*~~

*In appropriate cases, the Council will consider the use of its other statutory powers, including section 203 of the Housing and Planning Act 2016, to facilitate development where it is in the public interest.*

- 9.5 In relation to the amendments proposed to Part A, the use of CPO powers should not be limited to “comprehensive development”, but to development for which there is a compelling case in the public interest. Often that will be comprehensive development, but not always. Also, the use of the word “necessary” does not fit with the wording in S 226(1)(a), which is that the authority thinks that the use of the powers will facilitate the development, redevelopment or improvement of land.
- 9.6 The statutory test for using S 226(1)(a) powers is found in S 226(1A), which is that the use of the powers will contribute to the achievement of the social, economic or environmental wellbeing of the area, rather than satisfying local plan requirements. That can be part of the well-being test. Landsec consider that it is not necessary to have a test involving demonstrating how the costs of a CPO process will impact on development viability. That will be part of the Council’s consideration of whether to use its CPO powers, and should not be a separate policy test.
- 9.7 In relation to the amendments proposed to Part B there will be cases where, in order to facilitate development, the use of S 203 will be needed instead of/in addition to the use of CPO powers. It is important to make that clear.



Quod

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# Appendix 1 - Lewisham Regulation 19 Local Plan

## Representations by Landsec

Lewisham Shopping  
Centre

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April 2023

**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

Title	<input type="text" value="Mr"/>	Address Line 1	<input type="text" value="21 Soho Square"/>
First Name	<input type="text" value="Ben"/>		<input type="text"/>
Last Name	<input type="text" value="Ford"/>	Line 2	<input type="text" value="London"/>
Job Title	<input type="text" value="Senior Director"/>	Line 3	<input type="text"/>
Organisation	<input type="text" value="Quod on behalf of Landsec"/>	Line 4	<input type="text"/>
Telephone number	<input type="text" value="07834 451 520"/>	Post code	<input type="text" value="W1D 3QP"/>
		E-mail Address	<input type="text" value="PLEASE REFER TO COVERING EMAIL"/>

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

1. **To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?** Chapter name  
14 - Lewisham's Central Area
2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)** Policy name/number  
Site Allocation 2 and policy LCA2
3. **Do you consider that this part of the chapter is legally compliant?** Yes  No
4. **Do you consider that this part of the chapter sound?** Yes  No
5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?** Yes  No
6. **Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.*

**Continue answer on separate sheet if necessary.**

Please refer to Sections 1, 2 and 8 and Appendices 2, 3 and 4 of the accompanying Lewisham Regulation 19 Local Plan Representations by Landsec, dated April 2023.

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<p>Yes <input checked="" type="checkbox"/></p> <p><small>(I do wish to participate in an examination hearing session)</small></p>	<p>No <input type="checkbox"/></p> <p><small>(I do not wish to participate in an examination hearing session)</small></p>
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- |   |   |
|---|---|
| <b>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</b>   | Chapter name<br><input type="text" value="5 - High Quality Design"/>      |
| <b>2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</b> | Policy name/number<br><input type="text" value="Policies QD4, QD5, QD6"/> |
| <b>3. Do you consider that this part of the chapter is legally compliant?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>                  |
| <b>4. Do you consider that this part of the chapter sound?</b>  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>       |
| <b>5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>                  |
| <b>6. Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.</b>  |   |

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**Continue answer on separate sheet if necessary.**

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Yes

No

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- |   |   |
|---|---|
| <b>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</b>   | Chapter name<br><input type="text" value="6 - Heritage"/>           |
| <b>2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</b> | Policy name/number<br><input type="text" value="Policy HE3"/>       |
| <b>3. Do you consider that this part of the chapter is legally compliant?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>            |
| <b>4. Do you consider that this part of the chapter sound?</b>  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| <b>5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>            |
| <b>6. Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.</b>  |   |

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Yes

No

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- |   |   |
|---|---|
| <b>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</b>   | Chapter name<br><input type="text" value="7 - Housing"/>                                |
| <b>2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</b> | Policy name/number<br><input type="text" value="Paras. 7.24, 7.34. Policies HO1, HO7"/> |
| <b>3. Do you consider that this part of the chapter is legally compliant?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>                                |
| <b>4. Do you consider that this part of the chapter sound?</b>  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                     |
| <b>5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>                                |
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Yes

No

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- |   |  |
|---|--|
| <b>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</b>   | Chapter name<br><input type="text" value="8 - Economy and Culture"/>                         |
| <b>2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</b> | Policy name/number<br><input type="text" value="Policies EC3, EC4, EC11, EC12, EC13, EC14"/> |
| <b>3. Do you consider that this part of the chapter is legally compliant?</b>   | Yes <input type="checkbox"/> No <input type="checkbox"/>                                     |
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Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<small>(I do wish to participate in an examination hearing session)</small>	<small>(I do not wish to participate in an examination hearing session)</small>

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# Appendix 2 - Lewisham Regulation 19 Local Plan

## Representations by Landsec

Lewisham Shopping  
Centre

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April 2023

Q230413

# 1 The Policy Basis for Town Centre Diversification

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- 1.1 Landsec's representations and vision has its foundations within adopted national policy, the National Planning Policy framework (2021) (the 'Framework') and the London Plan (2021).
- 1.2 Policies within both documents, support adaptation and diversification of town centres to respond to the anticipated needs for town centre uses such as retail, office and leisure.
- 1.3 Diversification in centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported, alongside the promotion of residential floorspace which is considered a fundamental component of town centre vitality and viability.

## National Planning Policy – The Framework (2021)

- 1.4 National policy relating to the vitality of town centres (Chapter 7) requires planning policies and decisions to support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation<sup>1</sup>.
- 1.5 National policy recognises that town centres should grow and *"diversify in a way that can respond to rapid changes in retail and leisure industries" allowing 'a suitable mix of uses (including housing)'*<sup>2</sup>.
- 1.6 Development plan policies should *"recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites"*<sup>3</sup>.
- 1.7 National policy recognises that markets should be retained and enhanced and, where appropriate, new ones should be re-introduced or created<sup>4</sup>.
- 1.8 Fundamentally, the anticipated needs for retail, office and leisure should be met, looking at least ten years ahead<sup>5</sup>.
- 1.9 Reflecting the changing retail sector, the Government announced significant changes to the Use Classes Order which could render retail only town centre policies redundant. Class E (Commercial, Business and Service) will incorporate a very wide spectrum of uses including Retail (previously A1), Financial and professional services (previously A2), Restaurant (previously A3), Offices (previously B1a), Research and Development (previously B1b), Light

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<sup>1</sup> NPPF Paragraph 86

<sup>2</sup> NPPF Paragraph 86 (a)

<sup>3</sup> NPPF Paragraph 86 (f)

<sup>4</sup> NPPF Paragraph 86 (c)

<sup>5</sup> NPPF Paragraph 86 (d)

Industrial (previously B1c), Medical and health facilities (previously D1), Creches and day nurseries (previously D1), and Indoor sport, recreation and fitness facilities (previously D2).

- 1.10 This new class allows for a mix of uses to reflect changing retail and business models. It recognises that a building may be in a number of uses concurrently or that a building may be used for different uses at different times of the day.
- 1.11 The Government expects that bringing these uses together and allowing movement between them will give businesses greater freedom to adapt to changing circumstances and to respond more quickly to the needs of their communities.

## London Plan (2021)

### Diversification

- 1.12 The London Plan Policy SD6 'Town Centres and High Streets' reinforces the need to promote and enhance town centre vitality and viability (Part A). It seeks to achieve this through inclusivity; a diverse range of commercial and community/social uses (operational day and night); housing; access by walking, cycling and public transport; creating a sense of place and local identity; economic contribution; and a Healthy Streets Approach<sup>6</sup>. Whilst the London Plan does not define vitality and viability, it may be construed that this comprises a reasonable definition.
- 1.13 The policy specifically recognises that *"the adaptation and diversification of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries"*<sup>7</sup>.
- 1.14 Part C and D refer to the importance of introducing new homes into town centres. The potential for new housing within town centres should be realised, capitalising on the availability of services within walking distance and current/future accessibility by public transport<sup>8</sup>. The suitability of town centres to accommodate a diverse range of housing should also be considered and encouraged. Specific reference is made to smaller households, Build to Rent, student accommodation and older people's housing<sup>9</sup> as being suitable for town centres.
- 1.15 The re-development change of use and intensification of identified surplus office space to other uses including housing should be supported; social infrastructure should be enhanced; and Safety and security should improve.
- 1.16 Boroughs should support the town centre first approach in their development plans by assessing the need for main town centre uses, taking into account capacity and forecast future need; allocate sites to accommodate identified need within town centres, considering site suitability, availability and viability, and review town centre boundaries where necessary; support the development, intensification and enhancement of each centre, having regard to

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<sup>6</sup> LP SD6A(1-6)

<sup>7</sup> LP SD6B

<sup>8</sup> LP SD6C

<sup>9</sup> LP SD6D

the current and potential future role of the centre in the network; identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1<sup>10</sup>.

- 1.17 In respect of identifying sites suitable for higher density mixed-use residential intensification the London Plan suggests a number of relevant examples:<sup>11</sup>
- comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge-of centre retail/leisure parks.
  - redevelopment of town centre shopping frontages that are surplus to demand.
  - redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses; and
  - delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.
- 1.18 The rest of the policy suggests a flexible approach based upon existing capacity, forecast need and diversification. Vitality and viability are not dictated solely by retail floorspace quantum, rather a whole range of uses, including housing.

### The Role and Function

- 1.19 Policy SD8 'Town Centre Network' recognises that *"the changing roles of town centres should be proactively managed"* in relation to Annex 1. Diversification in centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported<sup>12</sup>. These centres may be reclassified at a lower level in the hierarchy through a coordinated approach with local planning authorities.
- 1.20 The classification of International, Metropolitan and Major town centres (Annex 1) can only be changed through the London Plan.<sup>13</sup> Annex 1 indicates potential future changes to the Town Centre Network. International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high-quality environment. Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1.
- 1.21 The London Plan defines Metropolitan centres as serving wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically, they contain at least 100,000m<sup>2</sup> of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.

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<sup>10</sup> LP SD7

<sup>11</sup> LP SD7C(5)(5)(a-d)

<sup>12</sup> LP SD8B

<sup>13</sup> LP SD8C



1.22 The London Plan defines Major centres as typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000m<sup>2</sup> of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.

### Lewisham

1.23 The London Plan Annex 1 Town Centre Network (and Figure 2.18 Town Centre Classification) provides strategic guidance for town centres in London.

1.24 Lewisham is categorised as a Major Town Centre (ref. 40) with 'future potential' for classification as a Metropolitan Centre. The broad London Plan approach for Lewisham is set out below.

- Residential growth potential – **High** – This is a broad strategic-level categorisation that has been informed by the SHLAAA and Town Centre Health Check and takes into consideration the potential for impacts on heritage assets.
- Commercial growth potential – **High** – includes town centres likely to experience strategically-significant levels of growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6).
- Office Guideline – **C** – Protect small office capacity – These centres show demand for existing office functions, generally within smaller units. Category C is the lowest growth category for offices. Category A centres have the capacity, demand and viability to accommodate new speculative office development; and Category B the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use.
- Night-time economy classification – **NT3** – These centres have a strategic night-time function involving a broad mix of activity during the evening and at night, including most or all of the following uses: culture, leisure, entertainment, food and drink, health services and shopping. NT3 is a more than local centre. For reference NT1 is an international or national centre and NT2 is a centre with regional or sub-regional significance.
- Strategic area for regeneration – **Yes**

1.25 The London Plan allocates New Cross/Lewisham/Catford as an opportunity area for 13,500 homes and 4,000 jobs. The relationship with this wider growth area is important because New Cross (District) and Catford (Major) are designated town centres themselves and include uses which in other Boroughs may include in higher level town centres (e.g., Metropolitan Centres) e.g., the Civic Centre, Broadway Theatre, Goldsmith's College and other evening economy/cultural uses.

1.26 Unlike Croydon or Kingston, for example, where all the uses are concentrated within the Metropolitan Town Centre, Lewisham is different as these uses are located in adjacent centres. The potential for Lewisham to achieve Metropolitan status does therefore need to consider the residual effects on the growth and renewal ambitions of Catford and Deptford.

1.27 Supporting text paragraph 2.1.19 states that Lewisham will grow in function and population and has 'potential' to become a town centre of Metropolitan importance. The potential for further growth at Lewisham will be supported by the arrival of the Bakerloo line at Lewisham Interchange. This will bring enhanced access to central London and encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population. Public realm and environmental enhancements of the town centre and surrounding employment, mixed-use and residential re-developments will continue to be delivered and will assist the continued transformation of Lewisham into a 'high performing' and 'vibrant' retail hub with excellent leisure services.

### Mayor of London Adaptive Strategies

1.28 The Mayor of London is seeking to grapple with the issue of town centre flexibility having published his 'Adaptive strategies'<sup>14</sup> for high street renewal in early 2020. The Mayor reminds us that his new London Plan calls for high streets and town centres to adapt and diversify.

1.29 The Mayor recognises that London's town centres are the focal point for our culture, communities and everyday economies. They support the most sustainable models of living and working, including active travel and shorter commutes. The strategy recognises that high streets are so much more than just retail. The guidance supports the implementation of ambitious, innovative and fresh strategies so our high streets and town centres not only adapt and survive but thrive.

1.30 Landsec supports the recognition that when it comes to our high streets, London's communities, businesses and local authorities can show extraordinary levels of enterprise, motivation and commitment to delivering change. In particular Landsec supports the following findings within the Mayor's report:-

- There is significant value in London High Streets. Jobs, businesses, other non-residential uses and the homes we live in are all part of our understanding of the high streets as places. High streets typically have more retail at ground floor facing the street, but they support a huge range of uses above and behind, and an interdependent mix of different activities and characteristics. Taken together, these have a multiplier effect in creating value of many types.
- High streets are about much more than retail. London's high streets serve a wide range of Londoners in multiple and inclusive ways. They are highly social, diverse and accessible spaces. As such, they have a crucial role in supporting social, economic and environmental benefits. Particularly significant is the observation that high streets often cater for groups who are at risk of marginalisation or under-representation. These include the young, the elderly, jobseekers and those with young families.
- Whilst high streets appear to be a resilient urban typology in London, this varies widely across the city. For example, in Metropolitan centres, growth in the number of businesses and jobs is much lower than for high streets in general. Some of London's larger centres are seeing a downturn in retail-related jobs and businesses, which is significant by national standards. In the three years from 2015-2017, retail employment in Kingston Metropolitan town centre for example fell by 15 per cent. The Mayor's latest data shows

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<sup>14</sup> Mayor of London High Streets & Town Centres Adaptive Strategies, 21<sup>st</sup> January 2020

that Croydon town centre has an overall vacancy rate of 22 per cent across all use classes.

- The Mayor sees high streets and town centres as good places for residential intensification. This is already being delivered across London, especially outer London, meaning more people will be living on and around high streets. Huge changes are needed. That's why the London Plan supports and encourages the adaptation and restructuring of town centres. This will enable them to take advantage of existing infrastructure and benefit from higher populations of residents.

1.31 National policy and the London Plan provide an important policy framework, the conformity of which will apply a rigid backbone to Landsec's proposals.

### Lewisham - Adopted Development Plan

1.32 The adopted Lewisham Town Centre Local Plan (2014) (the 'LTCLP') recognises that Lewisham Shopping Centre will be 'redeveloped over time'<sup>15</sup>.

1.33 The plan specifically promotes redevelopment of the Leisure Box and Riverdale Hall for commercial uses at ground floor and residential above and supports residential conversion of the Citibank Tower (Lewisham House). It also allocates comprehensive redevelopment of the Beatties Building and model market to provide retail/restaurants or leisure uses on the ground floor with commercial or residential uses on the upper floors.

1.34 Policy LTC8 – S9 Land north of the Lewisham Shopping Centre comprises land to the north east of the Lewisham Shopping Centre, the Citibank Tower and the land surrounding it. It recognises that redevelopment of the site could be in sections or phases. Redevelopment will be encouraged in conjunction with more comprehensive improvements to the Lewisham Shopping Centre to provide retail (A1 – A3) and/or leisure use on the ground floor with commercial, leisure and/or residential use on the upper floors.

1.35 Policy LTC8 confirms that more intensive office use or residential conversion of the Citibank Tower would be favourably considered by the Council. Any proposal should include recladding of the building and improved environmental performance. Redevelopment (including taller elements) should respond positively to the Lewisham Gateway development and provide a welcoming and accessible entrance to the centre from Lee High Road.

1.36 Policy LTC8 – S10 Land south of the Lewisham Shopping Centre seeks comprehensive redevelopment of the Beatties Building and model market sites to provide retail (A1-A3) or leisure uses on the ground floor with commercial and or residential uses on the upper floors. Redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre, while respecting the height, mass and bulk of local surroundings. It should create a new southern anchor for Lewisham High Street to encourage customers to travel the full length of the High Street.

1.37 Whilst dated, some of the principles established in the 2014 Local Plan remain relevant to the current redevelopment objectives of Landsec.

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<sup>15</sup> 2014 LTCLP Policy LTC8 – Lewisham Central Policy Area



Quod

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# Appendix 3 - Lewisham Regulation 19 Local Plan

## Representations by Landsec

Lewisham Shopping  
Centre

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April 2023

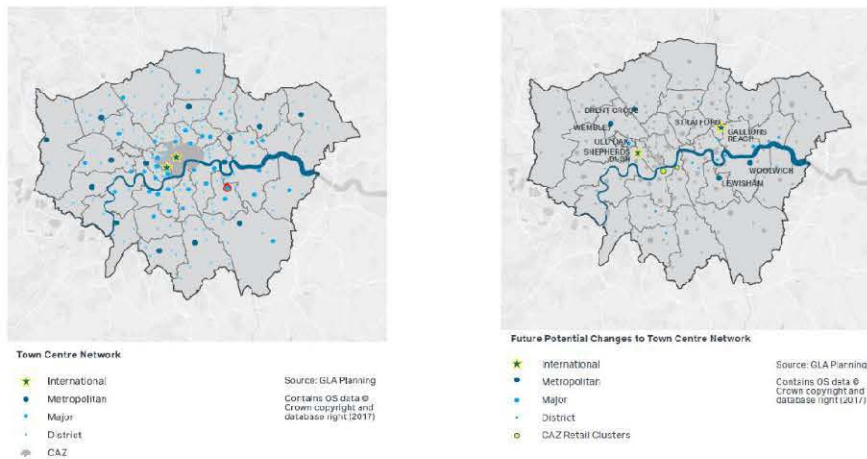
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# 1 Lewisham Town Centre

## Existing Role and Function of Lewisham Town Centre

- 1.1 London comprises two international town centres (West End and Knightsbridge) and 14 Metropolitan Centres.
- 1.2 Geographically Canary Wharf is the closest Metropolitan Centre to Lewisham (one of ten Metropolitan Centres north of the River Thames). South of the Thames there are only 4 Metropolitan Centres (Bromley, Croydon, Sutton and Kingston) which form a crescent south of Lewisham. These centres are illustrated below with Lewisham highlighted in red in Figure 2 below.

Figure 1 & 3 - London Plan Figure 2.17 Town Centre Network and London Plan Figure A1.1 – Future Potential Changes to the Town Centre Network



- 1.3 At present, Lewisham is one of 36 centres classified as 'Major', albeit the only town centre south of the Thames with the potential for re-classification to Metropolitan, as set out at Figure 3 below. The Royal Borough of Greenwich is not seeking reclassification of Woolwich town centre due to insufficient retail expenditure growth and market share.
- 1.4 Across London, there are other examples of town centre development, albeit none directly comparable to Site 2 at Lewisham. This is because Landsec are seeking to balance the need to develop and invest whilst maintaining operational continuity and limiting disruption to the rest of the associated town centre, whilst redeveloping in the context of reducing retail floorspace needs.
- 1.5 Landsec also do not consider that wholesale demolition of the Lewisham Shopping Centre (as a first phase) to create a cleared site would be the most appropriate solution for Lewisham. It would detrimentally result in more areas of the town centre becoming inactive and redundant for a long period pending development. However, costs are associated with this approach.

- 1.6 Stratford, Shepherds Bush and Croydon relied upon large, cleared sites to bring forward a specific retail model by Westfield. Croydon was more complex as it relied upon another landowner (Hammerson) but ultimately failed due to the economic cycle and is now a redundant business model due to on-line shopping. Hammerson also tried to deliver a similar retail model at Brent Cross but this has been in gestation for decades and the focus is now on the delivery of the residential quarter south of the north circular by Argent, similar to the International Quarter at Stratford and White City Living.
- 1.7 Sutton Metropolitan Centre is different to Westfield, albeit like Lewisham has been the subject of a number of individual development plots that comprise tall buildings. Whilst cumulatively they symbolise regeneration and investment, individually the silo applications are unable to contribute significantly to the town centre as they are in different ownerships on very small plots. The St Nicholas Centre freehold has now been purchased by the Council to plan for the rationalisation of surplus floorspace.
- 1.8 Canada Water and Wembley comprise low density retail warehouse and leisure parks with large surface level car parks. Whilst not fully cleared sites like Westfield, they do represent simpler clearly defined phases of development with greater scope for unencumbered development without multiple and layered interests such as those at Lewisham.
- 1.9 The Elephant and Castle development comprises the shopping centre and land beyond it. Unlike Lewisham, the whole shopping centre was first demolished (2021). The site will comprise (Phase 2) Castle Square, a small shopping destination bringing together local traders around a public square (already opened), 485 homes across three towers and a twelve-storey university campus for UAL's London College of Communication.
- 1.10 The London Plan 2021 classifies town centres across London in accordance with their existing role and function, which is determined by the health check criteria that considers the centres' scale, mix of uses, financial performance and accessibility. The definition of Metropolitan and Major Town Centres is set out at paragraph 2.21 and 2.22 of this report. The GLA periodically complete a health check on all town centres across London. The most recent health check dataset was published in 2017.
- 1.11 The health check data is used to monitor the performance of each town centre and also helps to inform the classification of town centres through the application of threshold ranges for several town centre floorspace uses. When a town centre meets or exceeds these thresholds then the town centre classification may be reviewed and recommended for promotion or demotion depending on its performance
- 1.12 The town centre classification thresholds are replicated at Table 1 below. These identify various subcategories beyond the headline of at least 100,000m<sup>2</sup> of retail, leisure and service floorspace set out in the Metropolitan town centre definition of the Annex 1 of the London Plan.

**Table 1 - Town Centre Classification Threshold (2017 London Town Centre Health Check Analysis Report)**

**Table A2 – Town centre network and future potential network classification thresholds**

	International		Metropolitan		Major		District		CAZ	
	Upper	Lower	Upper	Lower	Upper	Lower	Upper	Lower	Upper	Lower
All occupied floorspace (sqm) without offices		240,000		100,000	100,000	50,000	50,000	5,000	100,000	5,000
All occupied retail floorspace (sqm)		200,000		65,000	65,000	25,000	25,000	2,500	65,000	2,500
All occupied comparison floorspace (sqm)		180,000		50,000	50,000	15,000	15,000	1,000	50,000	1,000
Comparison goods retail as a per cent of total retail floorspace	100	90	100	75	75	50	65	15	100	15
Convenience goods retail as a per cent of total retail floorspace	0	10	5	25	15	45	20	75	0	60
All occupied leisure floorspace (sqm)		100,000		25,000		10,000		1,000		2,500
Office floorspace (sqm) - total (B1a) stock at 31.03.2016		1,000,000		65,000		30,000		500		30,000
Multiples as a per cent of total floorspace (Multiple + Independent)	90	50	80	50	80	30	80	5	80	25
Town centre base employee estimates (no.)		9,000		5,000		1,500		100		500
Town centre Workplace Zone employee estimates (no.)		20,000		10,000		4,500		700		4,000
Absolute 2016 Zone A Retail Rents (£/sqm)		5,000		1,500		1,000		500		1,500
Rents Growth per cent rates 2009-16		50		5		5		5		5
Public Transport Accessibility Level (PTAL)	6b	6a	6b	6a	6b	5	6b	3	6b	6a

- 1.13 A review of the 2017 data, as shown at Table 2 below, identifies that Lewisham town centre falls below the total floorspace minimum 100,000m<sup>2</sup> criteria for a Metropolitan Centre (retail, leisure and service), at c.74,000m<sup>2</sup>.
- 1.14 It is expected that this figure may have reduced over the last five years due to increasing vacancies and recent developments.
- 1.15 Whilst Lewisham performs well against all of the Major town centre thresholds, the town centre does not meet any of the Metropolitan Town Centre criteria as summarised at Table 2 below.

**Table 2 - Total Floorspace Criteria (m<sup>2</sup>)**

Classification	Lewisham Town Centre	Metropolitan Town Centre Thresholds	Major Town Centre Thresholds
Total retail, leisure and service floorspace <sup>1</sup>	74,143	100,000-239,000	50,000-99,000
Retail	63,952		
- Total comparison	46,232	50,000-179,000	15,000-49,999
- Total convenience	13,670		
- Total service	4,050		

<sup>1</sup> London Plan Annex 1 Metropolitan Town Centre Definition (note that the GLA Health Check Report relates to occupied floorspace, rather than total floorspace)

Leisure	10,191	25,000-99,000	10,000-24,999
Office floorspace (B1a)	52,649	65,000-999,999	30,000-64,999

1.16 Metropolitan centres are characterised as serving a wide catchment that can extend over several London boroughs and into parts of the wider Southeast. To better understand Lewisham's role within the sub-region, we have considered the classification and floor areas of adjacent town centres in South-East London to understand whether there is likely to be competition from these centres in terms of role and function.

**Table 3 - Town Centre review for South-East London**

Town Centre	Lewisham	Catford	Peckham	Woolwich	Bromley
<b>Current Designation</b>	Major	Major	Major	Major	Metropolitan
<b>Borough</b>	Lewisham	Lewisham	Southwark	Greenwich	Bromley
<b>Distance from Lewisham</b>	N/A	1.8km	4km	6.3km	6.5km
<b>All occupied floorspace without offices (m<sup>2</sup>)</b>	74,143	41,390	66,643	69,146	143,078
<b>All occupied retail floorspace (m<sup>2</sup>)</b>	63,952	28,610	54,734	48,313	114,678
<b>All occupied comparison floorspace (m<sup>2</sup>)</b>	46,232	13,690	28,440	27,823	99,118
<b>All occupied leisure floorspace (m<sup>2</sup>)</b>	10,191	12,780	11,900	20,560	28,400
<b>Office floorspace (B1a) (m<sup>2</sup>)</b>	52,649	11,776	18,000	71,948	161,613

1.17 Table 3 identifies that Peckham and Woolwich town centres are also performing close to the upper thresholds of a Major town centre constraining growth capacity for Lewisham. Woolwich has received significant inward investment as a result of the opening of the Elizabeth Line, albeit is no longer seeking Metropolitan status due to a lack of retail capacity growth evidenced as part of the local plan review.

1.18 When considering Woolwich's potential for growth alongside the likes of Bromley, an established Metropolitan town centre, the ability for Lewisham to serve a wide catchment which can extend over several boroughs and into parts of the Wider Southeast through floorspace alone appears limited.

1.19 Spatial improvements (other than the binary metric of floorspace) can however improve town centre vitality and viability as well as the outcomes secured through investment in town centres for jobs, homes, businesses. These improvements can support Lewisham's role and function as potentially one of the most important centres in south London as it seeks to reinvent itself and compete with the more dominant established Metropolitan Centres to the south, and the growth ambitions of other Major Centres such as Woolwich, Canada Water, and the Elephant and Castle to the north. Yet unclassified centres with potential for classification such as North Greenwich and the Old Kent Road are also competing with Lewisham and driving growth through redevelopment based around tall building typologies.



- 1.20 Notably the Metropolitan Centres of Shepherds Bush (Westfield London) and Stratford (Westfield Stratford City) achieved their status through the completion of the Westfield shopping centre format. However, as demonstrated recently in Croydon, this format is no longer deliverable in the UK. Westfield has allowed the planning permission in Croydon to lapse and is currently repurposing excess retail floorspace at Stratford and Shepherds Bush.
- 1.21 Principally it was this retail format that Lewisham courted with an eye on Metropolitan status comprising strategically significant increases in retail floorspace (c.40,000m<sup>2</sup>) which would generate a wide catchment which can extend over several boroughs and into parts of the Wider Southeast. The Quod Technical Report (Appendix 2) Figure 4.1 and Figure 4.2 demonstrates that the catchment is currently more localised and does not yet extend across several boroughs.
- 1.22 The Council has maintained a longstanding aspiration to elevate Lewisham Town Centre to Metropolitan status. The adopted Core Strategy (2011) seeks to promote Lewisham Town Centre to Metropolitan status by 2026. The Reg 19 Plan repeats this vision<sup>2</sup> and contains policies to deliver Metropolitan status based upon a requirement to achieve considerable growth in comparison retail floor space.
- 1.23 Landsec has stated its ambition to assist the Council in seeking to achieve the potential for Metropolitan status by 2040.
- 1.24 Local Plans should be aspirational. The objectively assessed needs however point to the need for greater flexibility within the Reg 19 Plan, and an adjustment of indicative site capacities in respect of commercial floorspace. Landsec's promotion of greater flexibility also suggests that a broader set of qualitative metrics should be considered.

## Lewisham Shopping Centre

- 1.25 Lewisham Shopping Centre has been at the heart of the town centre for over 45 years and requires renewal. It was opened in 1977 as the Riverdale Centre, the largest building in Lewisham town centre. The centre comprises shop units set over 3 floors, an 800-space car park, offices, a large internal service area/road set above the shopping centre and a disused leisure and community centre.
- 1.26 The disused leisure centre has been closed for at least 23 years and offered sports facilities such as gymnastics, a five-a-side football, and badminton as well as an indoor bowls court, bar area and function rooms. On the ground floor was the Riverdale Hall which hosted a variety of events.
- 1.27 The design of the shopping centre (as a covered mall) results in full site coverage by a single building with 100% plot ratio. This offers limited opportunities for permeability and urban greening. It is an inclusive and enclosed environment solely reliant on retail occupancy and customer footfall to generate vitality and vibrancy. Without sustained long term retail

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<sup>2</sup> Policy EC12; Chapter 14 Strategic Objective No.2; and Policy LCA2

occupancy, there is no reason for the local community to visit the centre and it could have an adverse impact on vitality and viability of Lewisham as a whole.

- 1.28 Landsec has sought to keep the centre as occupied as possible however this has its challenges due to the restructuring of the retail sector and in the long term is not a sustainable solution for Lewisham Town Centre. Covid has created a greater issue by accelerating the structural change in retail, and through the loss of many high street retailers has removed current and future tenants. There simply are not the quantity and quality of tenants available to occupy the floorspace in a way which benefits the town centre in the long term.

## Vacant Floorspace

- 1.29 Lewisham Shopping Centre comprises c.36,000m<sup>2</sup> (GIA) of floorspace of which around 15,000m<sup>2</sup> (GIA) is vacant or subject to short term lets pending redevelopment. 70% of the floorspace is at ground floor, with 30% at first or second floor. Most of the centre is in retail use, with only a very limited food and beverage offering.

- 1.30 In addition, there is also c.6,800m<sup>2</sup> of vacant space as part of the wider estate. This comprises the former leisure centre (c.4,500m<sup>2</sup>) and the former Riverdale Hall (c.1,700m<sup>2</sup>) both of which are disused and have been vacant for many years. Adjacent, the longstanding vacancy of Lewisham House, which itself extends to some 12,100m<sup>2</sup> adds to the overwhelming sense of an oversupply of unrequired floorspace.

- 1.31 Within the wider Site Allocation 2 boundary, there is around 31,500m<sup>2</sup> (GIA) of floorspace of which around 7,000m<sup>2</sup> (GIA) is vacant.

- 1.32 Landsec has undertaken an assessment of the floorspace and use of that floorspace in Site Allocation 2, the key findings of which are summarised below:-

- There is 85,480m<sup>2</sup> of existing floorspace across Site Allocation 2.
- Of this area the Landsec ownership comprises 58%, and third-party land 42%.
- 35% of Site Allocation 2 is vacant, 5% short term lets (combined 34,131m<sup>2</sup>), and 60% let.
- 34% of Landsec ownership in Site Allocation 2 is vacant and subject to short term lets pending redevelopment.
- 49% of 3<sup>rd</sup> party land (17,613m<sup>2</sup>) in Site Allocation 2 is vacant.
- Of the 32,713m<sup>2</sup> of existing floor space in Lewisham shopping Centre, 14,612m<sup>2</sup> (45%) is vacant or subject to short term lets.
- Site Allocation 2 comprises 59% retail floorspace; 21% unclassified/other; 7% office; 5% storage; 3% gym; 3% food and beverage; 2% culture and 1% community.

## Improving vitality and viability

- 1.33 It is our opinion that consolidation of town centre floorspace, and particularly long-term vacancy is a pro-active planning tool to foster enhanced vitality and viability. It is a constructive

approach to the vitality and viability of the town centre which we believe the Council should embrace.

- 1.34 Lewisham town centre lacks diversity. This is reflected by the retail-dominated offer and the lack of evening economy and dwell time in the centre. For example, our household survey identifies a notable drop off in town centre restaurant / café use between the daytime and evening – by 35%.

### Employment and Job Density

- 1.35 The challenge in Lewisham is acute. It is the local authority with the lowest job density in London with only 0.4 jobs per resident. Overall employment has decreased since by -6% since 2015 compared to growth (4%) in London. Retail employment in Lewisham has flatlined over this period.
- 1.36 A new approach is therefore needed to support employment in the borough – and in particular in the town centre. This cannot rely on the continuation of a retail model that is outdated and declining. The counterfactual for the shopping centre, and indeed for the wider town centre, is not a continuation of the current snapshot. It is continued decline in employment.
- 1.37 Landsec recognise this issue and believe that it is appropriate to consider alternative ways of achieving potential Metropolitan status. The London Plan identifies that the 'potential' for Lewisham to become a town centre of Metropolitan importance is linked to its function and population. Significantly, the London Plan does not explicitly refer to the need for additional floorspace, but the creation of a 'high performing' and 'vibrant' retail hub. Within this context, we consider that the Council should align itself with the qualitative growth aspirations.

### Capturing a higher proportion of spend

- 1.38 The role and function of town centres is changing – the redevelopment of the shopping centre is an opportunity to move away from oversized big box retail which trades below company averages<sup>3</sup> and long-term vacancies to provide a mix of town centre uses that meet a local need, and with the aesthetic attractiveness to draw consumers in from a wider catchment.
- 1.39 This means capturing more of what people spend in person – including importantly on leisure, food and beverage (F&B) and the evening economy and creating a destination. There is comparatively little nighttime economy floorspace in Lewisham town centre, with no hotels or theatres, limited F&B and an overprovision of hot food takeaways. Catford has more floorspace to support its night time economy than Lewisham.
- 1.40 It also means capturing higher spending visitors / trips. Major centres with smaller consolidated floorspace achieve higher turnover per ft<sup>2</sup> than Metropolitan centres. The development of the shopping centre is an opportunity to provide a mix of uses that support the transformation of Lewisham into a high performing and vibrant retail hub. It is the performance of retail space and the vibrancy of the town centre that should inform the future plans for the town centre, not simply the quantum of floorspace.

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<sup>3</sup> Quod Technical Retail Note (Appendix) Table 5.2

### Expand and Diversify the Catchment

- 1.41 Proposals which include a range of living formats including build to rent, student accommodation and traditional homes including a range of apartment types at a location well served by public transport and cycle networks are likely to attract young, mobile households who will spend money in the town centre, particularly if the town centre offer is diversified and improved.
- 1.42 A report by the GLA 'More Residents, more jobs' (2015 update) found that 17 jobs were supported in the local area for every 100 residents. This would mean that 2,500 homes (excluding student accommodation) would support 850 jobs in the local area – ranging from teachers and health workers to people working in retail and leisure.
- 1.43 The provision of student accommodation represents an opportunity to support the demand for a wider variety of amenity and leisure uses and help animate the town centre in the evening. While student income is generally low, student spending is not – and it tends to be a disproportionately local and on a range of amenities. It also helps to forge links between education and employment opportunities (which is considered in more context below).

### Provide a Range of Job Opportunities

- 1.44 The redevelopment proposals promoted by the local plan include retail, leisure, community and office / workspace. Early proposed estimates suggest that there could be up to 1,700 full time equivalent jobs onsite – which could account for 2,300 jobs once part time working is taken into account. This would include entry level job opportunities (for example in the retail space) as well as space for small businesses to grow.
- 1.45 Landsec is committed to ensuring that the benefits of these jobs are maximised for the local community, and has conducted a local needs assessment, which highlighted the following:
- A need to support the (growing) younger population - the number of young people Not in Employment, Education or Training (NEET) in Lewisham is 54% higher than the London average (Department for Education, 2021)
  - High unemployment amongst ethnic minorities (higher in Lewisham compared with the London average)
  - Mental health is an area of need, with suicide rates (Public Health England, 2018-2020) and the rate of claimants with mental and behavioral disorders (ONS, 2020), both greater in Lewisham than in London as a whole.
  - Supporting people impacted by Covid-19 is a priority, especially given the high claimant count (ONS, 2021)
- 1.46 The development of the shopping centre is an opportunity to provide a sustainable mix of uses to ensure that the vibrancy of the town centre, and the jobs it supports, is maintained.
- 1.47 Landsec is already working to support young people in Lewisham through their existing partnerships with Construction Youth Trust and Circle Collective. They provide support such as donated resources, funding and volunteer time.

- 1.48 Landsec is working with Circle Collective to bring young people into the planning process for Lewisham Shopping Centre through their programme, Voice Opportunity Power which supports young people to have a voice in forums where they typically would not be present.
- 1.49 Landsec has supported Construction Youth Trust through funding to create a hub in Lewisham that has allowed the organisation to support four schools in the borough. Construction Youth Trust are working with these schools to provide curriculum support and help young people access meaningful employer engagement, work experience, site visits and practical sessions.
- 1.50 The construction phase of the project is likely to support significant jobs over a long period of time. Landsec will continue support Construction Youth Trust through construction to achieve its targets which are set out below:
- Creating apprenticeships (1-2 weeks per every 1 FTE employed)
  - 3-5% of construction workforce being people Not in Employment, Education or Training
  - Targets will also be set around paid and unpaid work placements, local school engagement, site visits and career advice
- 1.51 Landsec is also committed to supporting local people throughout the development lifecycle with their targets:
- All jobs to be advertised locally 7 days prior to general advertisement in construction and new management employment opportunities in-use
  - 30%+ of all new jobs created to be targeted for local people through construction and in-use
  - Recruitment programmes to support those who are long-term unemployed or been impacted by the Covid-19 pandemic
- 1.52 Landsec is committed to supporting the local economy in Lewisham through the construction and in-use stages of the development. Currently, Landsec already provide support to social enterprises such as Circle Collective as well as free donated space to charities such as the Migration Museum. Landsec is committed to continuing this legacy through initiatives such as:
- 50% local spend in construction and 50% spend in management supply chain in-use
  - 10-20% of local spend with SMEs through construction and in-use
  - Targets will also be set for Landsec and its delivery partners around providing expert business advice locally
  - Landsec will also commit to a 15% social value weighting in the procurement of its delivery partners
- 1.53 Landsec will also support community programmes to support a healthier and safer community in Lewisham:
- Supporting mental and physical health programmes through its workforce and supply chain
  - Providing investment and volunteer time to organisations that promote health and wellbeing in Lewisham such as: Lewisham Compass @ The Hub, Lewisham Community Wellbeing, Cycle Confident, Ageing Well in Lewisham and Age Exchanges

1.54 These initiatives represent long term economic benefits for Lewisham Town Centre and form part of the employment initiatives to achieve Metropolitan status.



Quod

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# Appendix 4 - Lewisham Regulation 19 Local Plan

## Representations by Landsec

Lewisham Shopping  
Centre

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April 2023

# Public engagement

We have continued to gather local aspirations for the redevelopment of Lewisham Shopping Centre.

Through extensive engagement and consultation, the project team has built a good understanding of the key local priorities and aspirations for the redevelopment.

## Round one (Summer 2020)

- Six week consultation period
- 10,000 newsletters
- Contact with 115 community groups
- Contact with market traders
- 2 'Virtual Village Halls'

## Round two (2021)

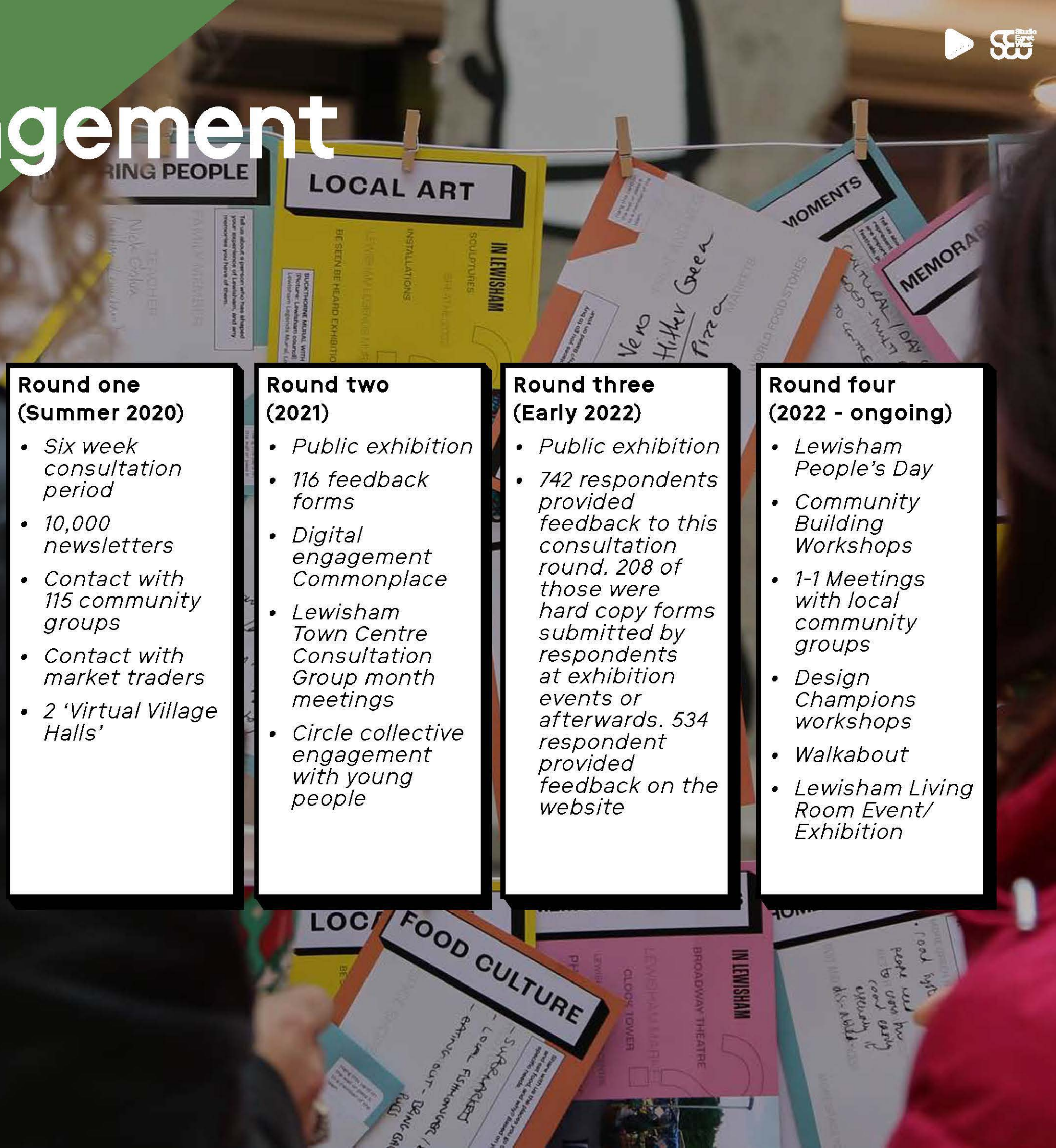
- Public exhibition
- 116 feedback forms
- Digital engagement Commonplace
- Lewisham Town Centre Consultation Group month meetings
- Circle collective engagement with young people

## Round three (Early 2022)

- Public exhibition
- 742 respondents provided feedback to this consultation round. 208 of those were hard copy forms submitted by respondents at exhibition events or afterwards. 534 respondent provided feedback on the website

## Round four (2022 - ongoing)

- Lewisham People's Day
- Community Building Workshops
- 1-1 Meetings with local community groups
- Design Champions workshops
- Walkabout
- Lewisham Living Room Event/Exhibition





# Engagement summary

The engagement to date has focused on gathering local aspirations for the redevelopment and feedback on the general design principles prior to the more detailed masterplan consultation taking place this year.



## Community Building Workshops

*In August 2022, we had two Focus Groups with Circle Collective and other civic and community organisations.*

*The workshops were used to further understand what people would want from a new space to ensure programming of the town centre was reflective of the communities of Lewisham. The young people at Circle Collective expressed desires for theatre and performance spaces, workspaces, community kitchens and social support uses.*



## Design Champions

*The Design Champion Group, established in August 2022 is made up of a cohort of 16 hyper-local residents and representatives to help develop the Design Code and act as a sounding board for the redevelopment. We received over 300 applications following a call out to be part of the Design Champions group. The screening process ensured the group was representative of the demographic of the local area. The Design Champions were an integral part of understanding the various community dynamics of Lewisham and how this fits into the proposal.*



## Design Workshops

*We ran three topic based workshops with the Design Champions between July and November 2022. They included a walking tour to understand the character of Lewisham and highlight what spatially works and what does not around the shopping centre. We had workshops dedicated to movement, connectivity and community visions and ambitions for public realm design based on their experiences as locals.*



## Lewisham Living Rooms

*The Lewisham Living room was a pop-up interactive space set up in the Lewisham Shopping Centre on 17th November and 9th December 2022. The Living Room was an opportunity for the local community to share their memories of Lewisham, as well as aspirations for the future of the town centre. By directly engaging with local residents, we were able to gain a thorough understanding of the character and identity of Lewisham, as well as personal memories and people's visions for the future. We aspire to use the Living Room set up in a more permanent arrangement as the engagement progresses.*

# Summary of findings

## WHAT MAKES LEWISHAM UNIQUE

- The market brings a sense of community which is unique to the people of Lewisham. It is a key reference point, as well as a part of local people's daily life, as traders and consumers.
- Historical civic and community spaces, such as the old marketplace, an old ice rink and a recreational space in the centre were remembered as spaces unique to Lewisham's heritage.
- Locals and residents have a strong affinity with the local cafés and restaurants, where they build relationships within the local community.

## FUNCTION VS DESTINATION

- Lewisham Town Centre is seen as a place which serves functional needs, rather than an active destination point.
- The town centre is often used as a 'cut through' for other destinations, for example the train station.
- The shopping centre is visited mostly for everyday necessities to those who live close by but not a place for occasional or causal visits.
- There are not many amenities or spaces to nourish community and social cohesion.
- There is a lack of civic spaces which encourage people to sit, rest and socialise.

## GREEN AND OPEN SPACES

- Lewisham lacks well maintained and properly managed green spaces and public open spaces.
- People have a strong desire for both open green spaces for relaxation and improved mental health, as well as green routes through the town centre – including more trees and planting.
- People feel there is no connection to nature in Lewisham, and that it is currently a very hard landscape that needs to be softened.
- People said green spaces should feel accessible to all through being properly integrated into the town centre.

## MOVEMENT AND CONNECTIVITY

- Currently the shopping centre acts as a barrier to movement, feeling like an impermeable structure that is not a desirable through route.
- There is a desire for better permeability through the centre, particularly east-west connections through the shopping centre that encourage social interactions, relaxation and offer green spaces.
- Transport and movement infrastructure currently feels 'messy' and 'illogical'.
- Traffic is a significant barrier to movement and a reason why locals choose to avoid the town centre.

## SAFETY AND WELLBEING

- It was mentioned that the town centre can feel unsafe, with routes that would only be taken in the daytime, it was said that better lighting at night could improve feelings of safety.
- People commented that spaces to sit and rest were needed to improve Lewisham to be more people centric.
- A variety of rest spaces were desired, including 'formal' seating, such as benches, as well as green spaces and gardens to sit, rest and socialise. It was mentioned that these spaces could build intergenerational connections and tackle loneliness.

## LEWISHAM FOR EVERYONE

- Lewisham is proud of it's diversity – there is opportunity to preserve and enhance the local identity through the redevelopment.
- Many people called for more initiatives which teach people about the diverse culture of Lewisham and people's heritage, such as the Migration Museum
- More engagement with art and local artists was mentioned.
- There is a desire for spaces which build intergenerational connections, as well as spaces catering to older demographics, children and young people.

## A NEW TOWN CENTRE EXPERIENCE

- People desire a shopping experience which is diverse, enjoyable during both the daytime and the night time, with a stronger night time economy.
- People want to see more local and independent stores, restaurants and cafés as opposed to chain shops. There is a strong desire to maintain a local or 'village' feel to Lewisham, which is rooted in its local people and culture.
- People want a much wider range of shops, which cater to a diverse range of interests and activities; including music, art, books, gaming; as well as adding to the retail which is currently offered.

## A CHANGING TOWN CENTRE

- Some residents associate high-rise buildings with negative impact, including unfamiliar aesthetics, unaffordability of housing and wind tunnelling and overshadowing.
- Residents are keen that new developments give something back to the community
- People are optimistic about the benefits of regeneration and what it could bring to the local area.
- Some see regeneration as a process making the local area unaffordable, particularly shops and housing.

Planning Service  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
London  
SE6 4RU

Date: 25 April 2023

Dear Sir or Madam,

## Representations to Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review.

On behalf of Lewisham House No.1 Limited (Guernsey) (hereinafter 'the Client'), Knight Frank hereby submit representations in respect of the Regulation 19 Consultation on the Lewisham Local Plan Proposed Submission Document (dated January 2023), which is running from 1 March 2023 to 25 April 2023.

The London Borough of Lewisham ('LBL') commenced a review of their Local Plan in late 2015, with a consultation on the main issues for the Plan. LBL subsequently undertook a Regulation 18 Consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document (the Draft Local Plan) which ran from January to April 2021. It is understood that representations made to the Regulation 18 Consultation have informed the content in the Regulation 19 Local Plan Proposed Submission Document.

The Client have a major land interest in the borough as owners of Lewisham House, 25 Molesworth Street, SE13 7EP (hereinafter 'the Site'), which will be affected by the policies and allocations contained within the new Lewisham Local Plan. The Client supports the preparation of the Lewisham Local Plan Review and the allocation of the Site within the Plan for comprehensive mixed-use redevelopment. Notwithstanding, it is considered that in its current form the draft Local Plan would not be legally compliant or sound. Within this representation we provide comments on a range of draft policies against the tests of soundness, and where necessary, make specific reference to our Client's Site.

### The Site

Lewisham House is currently vacant but was last in use as an office (Use Class E(g)). The Site is situated within Lewisham Major Centre and is an underutilised and brownfield site in a highly sustainable location. The Site is suitable, available and deliverable within the first 5 years of the Plan period.

The Site has been subject to several prior approval applications in recent years. Prior approval (submitted under Schedule 2, Part 3, Class O) was granted on 28 March 2018 (Ref. DC/17/105087) for the change of use from office use to residential (Use Class C3) to create 237 units. The prior approval was not implemented. A subsequent prior approval application (Ref. DC/21/120369) was granted on 17 May 2021 for the change of use from office to residential (Use Class C3) to create 219 units with 322 cycle spaces and subject to a unilateral agreement.

The Site forms part of the Lewisham Shopping Centre site allocation under the provisions of the Regulation 19 Proposed Submission Document. It is in this context that the Client submits this representation. The Client wishes to ensure that the

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Your partners in property

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Regulated by RICS

Lewisham Local Plan, which will shape the future of the Borough and the regeneration of the Lewisham Shopping Centre site, is robust, flexible, and capable of responding to future economic and demographic changes.

### Regulation 19 Proposed Submission Document

Paragraph 35 of the National Planning Policy Framework ('NPPF') which the Local Plan will be considered against requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:

- Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
- Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

If the Lewisham Local Plan Proposed Submission Document fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Act 2004, is a legal requirement.

#### **Part 1: Planning for an Open Lewisham**

The Council sets out an overarching strategic objective for *"An Open Lewisham as Part of an Open London"* over the Plan period, which is then supported by nine themed topic areas. Within these nine themed areas, numerous objectives have been set out. For example, Strategic Objective B 'Housing tailored to the community with genuinely affordable homes' aims to ensure Lewisham's existing and future residents benefit from good access to a wide range and mix of high quality housing, including the needs of those from all age groups and at different stages of life. Objective F 'Celebrating our Local Identity' seeks to make the optimal use of land and facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas. Objective G 'Healthy and Safe Communities' aims to promote cohesive and mixed communities along with walkable and liveable neighbourhoods by ensuring development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive'.

Policy OL1 (Delivering an open Lewisham (Spatial Strategy)) and Figure 3.3 sets out those locations to which new development and investment will be directed.

The Client agrees with and acknowledges the importance of the abovementioned objectives and is well placed to assist LBL in their delivery. The Client's Site is an underutilised, brownfield site in a town centre location. Furthermore, Figure 3.3 identifies Lewisham Major Centre (including the Site) as a Regeneration Node. Overall, the Council's strategic objectives and Spatial Strategy, including the continued focus on making the optimal use of land, providing a wide range of housing, and facilitating regeneration, is supported.

#### **Part 2: Managing Development**

##### High Quality Design

The Council continues to promote the delivery of high-quality design throughout the Borough. Policy QD1 (Delivering high quality design in Lewisham) requires development proposals to follow a design-led approach to determine the most appropriate form of development that responds positively to the local context.

Policy QD4 (Building heights) and Figure 5.1 (Tall buildings suitability plan) sets out areas where tall buildings are considered acceptable in principle, in accordance with London Plan Policy D9 (Tall buildings). Policy QD4 Part C stated that in Lewisham Town Centre, the maximum height of buildings shall not normally be more than 16 – 35 storeys. It is acknowledged that this has been amended since the September 2022 version of the Regulation 19 Proposed Submission Document, which stated normal maximum heights of 25 – 35 storeys. It is understood that the analysis contained within the Tall Building Review Background Paper (2023) informed this revision - the analysis within which applied an 'additional level of scrutiny' to that utilised by Allies and Morrison in the 2022 Tall Building Study Addendum. The need to impose thresholds is understood, however extending the range to incorporate lower building heights should not prejudice development coming forward at the upper limits where it has been demonstrated that a site can accommodate such heights. The Client suggests that additional

text is provided to ensure the policy is suitably flexible and allows proposals to utilise the design-led approach to optimise site capacity.

Part F states that tall buildings must be delivered through a masterplan process, and refers to Policy DM3 (Masterplans and comprehensive development). Policy DM3 Part A states that development proposals must be accompanied by a site masterplan where they form all or part of a site allocation. Furthermore, policy DM3 Part B requires masterplans to comprise of: an assessment of the site and its context; a detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and a delivery strategy that identifies how the development will be implemented and managed over its lifetime.

The Client acknowledges and agrees that tall buildings require detailed design scrutiny, as set by the London Plan policy requirements (paragraph 3.9.4). However, it is contended that it is possible to do so without necessitating a formal masterplan. The criteria set out in Policy DM3 Part B can be satisfied through a detailed planning application process and submission, and requiring a masterplan for detail which can be provided through the application process is likely to result in significant delays to the timely delivery of development. It is therefore considered that the requirement for a masterplan is onerous and not fully justified.

Furthermore, the nature of the masterplan being requested is unclear. What status would the masterplan need to have? For example, is the intention an informal masterplan discussed with the Council, or a formally approved masterplan adopted as an SPD or alternatively an outline planning application? The lack of clarity is a significant concern, and as per the above reasons, we do not think a masterplan approach to sites comprising tall buildings is necessary or justified. It is suggested that the Council amend Policy QD4 either to wholly remove the requirement for a masterplan, or to provide greater clarity on what a masterplan approach would consist of.

Policy QD6 (Optimising site capacity) requires development proposals to use the design-led approach to make the best use of land and optimise the capacity of a site. Part B adds that proposals should have regard to factors such as the type and nature of the use proposed, and the context of the site with reference to the immediate and surrounding area. Finally, Part C states that where development proposals do not accord with the indicative capacity of a site allocation, they will only be supported where it is clearly demonstrated that optimal capacity will be achieved. The focus on optimising site capacity is supported, and aligns with London Plan Policy D3 (Optimising site capacity through the design led approach). LBL Policy should acknowledge, however, that the capacity outlined in site allocations is indicative and has not been informed by detailed analysis of individual parcels of land within an allocation. For mixed use allocations, in particular, capacity will depend on the land use coming forward on specific parcels of land.

### Housing

Policy HO7 (Purpose built student accommodation) Part A states that development proposals for Purpose Built Student Accommodation ('PBSA') will be supported where it helps to meet an identified need – taking into account the amount of PBSA within an area, and the proportion of PBSA provided in relation to the overall mix of housing within a development, relevant masterplan, or site allocation.

The Client requests clarity regarding 'proportion of overall housing mix within a site allocation', to ensure that the development potential of their Site would not be prejudiced as a consequence of what may or may not come forward on the remainder of the site allocation – which is in different ownership and thus out of their control. The Client agrees that PBSA provision should contribute to mixed and inclusive neighbourhoods, as per London Plan Policy H15 (Purpose-built student accommodation). However as currently worded, the policy assumes landowners within site allocations are aligned in their approach and aware of the development intentions of each other. This is not always the case and therefore this draft policy would necessitate landowners to make assumptions on forthcoming development. The policy as currently drafted would be difficult to enforce and ineffective.

The Council should also consider as part of applications the proportion of students living in the borough at the point an application is made, and as projected into the future. The implications of the increasing numbers of students living in general housing stock should be considered and balanced against the benefits of providing PBSA as part of the wider housing stock. PBSA has an important role to play in building capacity into the housing market, with each 2.5 beds accounting for 1 home.

Part B states that PBSA should be appropriately located, including at well-connected sites and within or at the edge of town centres. This is supported and aligns with part B of London Plan Policy H15 which encourages Boroughs to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

Part C states that PBSA must be of a high quality design and give particular consideration to (inter alia): adequate functional living space and layout, with a recommended benchmark of 1 sqm of internal and 1 sqm of external communal amenity space per student bed; inclusive and safe design; and amenity of occupiers and neighbours. The Client supports the focus on providing high quality PBSA, however it is suggested that the Council avoid being overly prescriptive in their requirements – particularly as retrofitting / change of use developments to provide PBSA are unlikely to be able to provide the specified amount of external amenity space. Given the increasing focus on retrofitting over redevelopment, buildings should not be prejudiced where they are unable to meet such amenity requirements, and policy should reflect that conversions are not always able to meet the same standards as new builds. Furthermore, PBSA products must evolve to changing market demand and student requirements, and therefore overly prescriptive policies limit future flexibility.

Overall, the Client supports a positive policy encouraging the provision of PBSA. However, for the reasons discussed above it is considered that the Policy as currently worded is not yet compliant. The Policy should be updated to acknowledge that developments within a site allocation or masterplan area will not be prejudiced where the development intentions of the other landowners are not known. Furthermore, more flexibility is required regarding provision of amenity space – particularly in the case of change of use / retrofit. The Council should insert text acknowledging that the recommended benchmark is targeted more toward new build developments and acknowledge that it will not always be possible for conversions to meet such a benchmark.

Policy HO8 (Housing with shared facilities (Houses in Multiple Occupation) part D states that development proposals for large-scale purpose-built shared living accommodation will only be permitted subject to certain criteria. The criteria includes (inter alia): meeting an identified local market demand for the type of housing proposed; well integrated provision of communal facilities and services; the development to be under single management; and all units are available to rent, with minimum tenancy lengths of no less than 3 months. This policy is broadly supported and it is noted that most of these criteria are reflective of London Plan Policy H16 (Large-scale purpose-built shared living). However, more clarity is required on the requirement for developments to 'meet an identified local market demand for the type of housing proposed'. Supporting paragraph 7.75 adds that *"Applicants will be required to submit robust evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living."* Shared living developments are not restricted to particular groups by occupation or specific needs, and instead provide an alternative to traditional flat shares. It is therefore not clear what type of marketing report would evidence this demand, as population cohorts such as traditional renters may wish to utilise shared living developments. The policy as worded is not robust or effective and should therefore be updated to clarify the nature of evidence required.

#### Economy and culture

Policy EC2 (Protecting employment land and delivering new workspace) sets out areas where employment land is safeguarded and encouraged to be delivered, in line with Lewisham's Employment Land Hierarchy. Figure 8.1 and Table 8.1 specify these locations. It is noted that much of this land is concentrated towards the northernmost part of the Borough, with sporadic Locally Significant Industrial Sites (LSIS) located elsewhere, and one Strategic Industrial Location (SIL) located immediately north of Bellingham Station. The locations are not interrelated, and the sporadic locations do not facilitate comprehensive employment areas.

It is acknowledged that part B(c) seeks to maximise opportunities to deliver new and enhanced workspace, including through appropriate mixed-use development in town and edge-of-centre locations and non-designated employment sites. Part C states that outside of designated employment areas the appropriateness for new employment uses will be assessed having regard to the nature and scale of the development, and additional criteria such as the compatibility with neighbouring land uses and compliance with other Local Plan policies. Encouraging the delivery of mixed-use development in highly accessible locations is supported, however this is not currently reflected in Figure 8.1 or Table 8.1 – it is suggested that these Figures should be updated, or new Figures provided, to reflect that town centre and well-located sites are also suitable for employment uses as part of regeneration and mixed use development. However, exclusive focus on providing 'appropriate mixed use development' is not suitably flexible, particularly with regard to change of use applications which cannot easily facilitate mixed use schemes. As noted above, the direction of travel is to reuse and repurpose existing buildings and so policy must be written in a way which accounts for this. We suggest Policy EC2 part B is amended to include a subpoint supporting change of use to provide employment floorspace in appropriate locations.

The policy also does not consider the loss of office, and it is therefore unclear whether existing office space is safeguarded under the provisions of the draft Regulation 19 Proposed Submission Document. As further discussed below, Policy LCA2 Part J seeks retention of existing workspace in Lewisham Major Centre, however this is not acknowledged in Policy EC2. It is suggested that the wording is updated to ensure clarity and consistency.

Policy EC11 (Town centres at the heart of our communities) states that town centres are and should remain at the heart of Lewisham's neighbourhoods and communities. Part B states that development proposals should support and help to secure

the long-term viability and vitality, for example through optimising the use of land and by delivering an appropriate mix and balance of residential and main town centre uses. Policy EC12 (Town centre network and hierarchy) promotes a town centre first approach. Part A states that development proposals must support and reinforce Lewisham's town centre network and hierarchy and Part B confirms that a 'town centres first' approach will be used to assess development proposals for main town centre uses, in line with the London Plan and the NPPF. Finally, Policy EC13 (Optimising the use of town centre land and floorspace) states that development proposals should optimise the use of land by delivering new mixed-use schemes on individual sites, and through comprehensive redevelopment of multiple sites and investigating opportunities for the reuse and reconfiguration of existing space.

The town centre first approach is supported and aligns with London Plan policy and the NPPF. The Client recognises the benefits of delivering high-quality development in sustainable, town centre locations. Through their major land interest in Lewisham, the Client is well placed to assist the Council in delivering the aspirations of these policies – through the redevelopment/change of use of an underutilised, allocated brownfield site in a town centre location. The Client looks forward to working proactively with the Council to ensure such aspirations are met.

### Sustainable Design and Infrastructure

Policy SD2 (Sustainable design and retrofitting) part D states that the use of sustainable retrofitting measures will be encouraged and supported. Part E and F specify that proposals for major residential domestic refurbishment and major non-residential refurbishment must achieve a certified 'Excellent' BREEAM rating, unless it can be demonstrated that this is not feasible. The Client welcomes the acknowledgement of the sustainability benefits of retrofitting.

### **Part 3 – Lewisham's Neighbourhoods and Places (Lewisham's Central Area)**

The Client supports the principles of Policy LCA1 (Central Area place principles) and Policy LCA2 (Lewisham major centre and surrounds) which encourage the continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre.

Policy LCA2 part E requires development proposals to be designed to improve access and permeability in the town centre and its surrounding area, **particularly where sites are to be delivered through comprehensive redevelopment**. This includes new or enhanced east-west routes through the Lewisham Shopping Centre site. Part H states that within the designated town centre area and at its edges, development proposals must provide for an appropriate mix of main town centre uses at the ground floor level. Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages. Part I requires development proposals to make provision for positive frontages with active ground floor frontages within the town centre and at its edges, and states that development must reinforce or create a positive relationship with the public realm at the street or ground floor level. New housing will only be acceptable on the upper floor levels.

The Client acknowledges the need to deliver positive active frontages in order to improve the public realm and increase safety. The policy as drafted, however, seems only to consider traditional residential and does not acknowledge that alternative forms of residential uses can assist in creating active frontages. For example, PBSA, co-living and some residential developments often incorporate amenity spaces and lobbies at ground and lower floors, thus creating active frontages. It is suggested that the policy is amended to acknowledge the potential of residential type developments to provide active frontages and improve the public realm, instead of an absolute requirement to deliver non-residential uses at ground and lower levels.

Part J adds that, in order to ensure Lewisham Major Centre maintains its role as a principal commercial and employment location within the Borough, development proposals must retain or re-provide existing workspace, and deliver net gains in industrial capacity where possible. This does not align with Policy EC2 (Protecting employment land and delivering new workspace) which does not make reference to the retention or reprovision of existing workspace and instead solely safeguards land included within Lewisham's Employment Land Hierarchy.

The principle of loss of office at the Site has previously been established through prior approval applications (this is acknowledged in guideline 12 of the Lewisham Shopping Centre site allocation, further discussed below). However, under the provisions of the draft Policy it is not clear the extent to which existing employment floorspace is safeguarded outside of designated employment areas. Although Part J seeks to retain existing workspace, clarity is not provided as to the requirements of justifying any loss of floorspace – for example, it is not clear whether this should be based on market demand, or viability. Furthermore, if the Council seek to '*ensure Lewisham Major Centre maintains its role as one of the Borough's principal commercial and employment locations*', this should be reflected in Figure 8.1 and Table 8.1 of Policy EC2 to ensure consistency.

We contend that both Policy LCA2 Part J and Policy EC2 should be amended to ensure consistency and to provide clarity on the locations to which employment development will be safeguarded and encouraged. Policy LCA2 should be amended to confirm the process for justifying loss of employment floorspace in areas in which it is safeguarded.

#### Site Allocation: Lewisham Shopping Centre

The Site is included within the draft Site Allocation for Lewisham Shopping Centre; comprising a much larger site of 6.38 hectares. The allocation is for comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses. An indicative development capacity of 1,579 net residential units; 20,097 sqm gross employment floorspace and 60,291 sqm of main town centre floorspace has been identified. Furthermore, paragraph 14.10 acknowledges that the redevelopment of Lewisham Shopping centre is essential to improving access and permeability within and through the centre and considers it noteworthy given its size and prominent location. The Client supports the allocation of the Site, and notes that development guideline 12 of the allocation acknowledges that the principle of redevelopment of the Site has already been established through the prior approval process.

The draft allocation acknowledges that there are different site ownerships across the allocation, stating that *“redevelopment options for the plots of land that do not fall within the ownership of the Lewisham Shopping Centre should be explored, to better integrate them into a comprehensive scheme for the wider site allocation”*. However, the allocation explains that landowners must *“work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development)”*.

As worded, the draft site allocation would prejudice the ability of the Site to come forward for redevelopment on an individual basis, instead requiring it to be delivered as part of the much larger site allocation. The allocation wording is particularly onerous in that it requires landowners to work in partnership **and** in accordance with a masterplan. The requirement for a masterplan has been discussed earlier within these Representations. To reiterate, the requirement for a masterplan is onerous and not fully justified. Furthermore, it is not sufficiently clear what the expectations for a masterplan would be. This is particularly the case given that the requirements of Policy DM3 Part B can be satisfied through the pre-application process and submission of a detailed planning application. The requirement for landowners to work in partnership is not sound and has the potential to cause significant delays in the delivery of development – particularly if owners have different or conflicting aspirations or have different commercial objectives that would require development to come forward at timescale not acceptable to the other parties. In the interest of ensuring deliverability of developments, whilst in an ideal world a masterplan covering the whole allocation would come forward, the reality is that sites will need to come forward as they are available to do so. The Council will have an important role to play to mediating between parties where a wider masterplan approach is sought.

The Client acknowledges that it is necessary to consider surrounding context and take account of emerging development when (re)developing a site, however policy already requires emerging development to do so, without requiring ‘partnerships’ between landowners. See, for example, Policy EC13 Part B(c) which states that mixed-use development proposals within town centres will be considered having regard to compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character. The Client contends therefore, that it is possible and arguably more efficient, for parcels of land within an allocation to come forward separately whilst still providing compatible uses and maintaining overall cohesion.

Given the varied land interests within the allocation, the wording must reflect that development of one parcel should not prejudice the development potential of another. The design-led process to optimise site capacity (for example, as per policy QD6 (Optimising site capacity) and EC13 (Optimising the use of town centre land and floorspace)) should take precedent over the indicative site capacity of the allocation, which has not given detailed consideration to the individual parcels of land within the wider site.

Furthermore, we note above that Policy HO7 specifies that such development should be delivered within or at the edge of town centres, and Policy HO8 specifies that such developments should be appropriately located in areas that are well-connected to local services. As such, we suggest that the allocation should be updated to reflect that the indicative residential capacity could also include alternative forms of residential such as PBSA and co-living in this highly accessible, town centre location. To this end, the indicative residential capacity of 1,579 net residential units must also be updated to include ‘or the equivalent of’ in order to account for uses such as PBSA – where 2.5 beds are equivalent to 1 residential unit. This will ensure the policy is robust and effective.

#### Conclusion

Lewisham House No.1 Limited (Guernsey) support the preparation of the new Lewisham Local Plan and broadly agree with the objectives and aspirations set out within the Regulation 19 Proposed Submission Document. In particular, the Client supports the inclusion of the Site within an allocation for comprehensive redevelopment, and the focus on encouraging a town centre first approach. However, the allocation as currently worded prejudices the Site as an individual development plot



and review is therefore needed in order to ensure optimised development of the Site will not be constrained by virtue of being within an allocation.

It is considered that in its current form the draft Local Plan would not be legally compliant or sound and the Client suggest that the Council review a number of the policies discussed above.

Should you have any queries or require further information at this stage, please feel free to contact Chris Benham ([Chris.Benham@knightfrank.com](mailto:Chris.Benham@knightfrank.com)).

Yours faithfully,



**Knight Frank LLP**

Planning Policy Team  
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**Date:** 25 April 2023

**Our ref:** 63329/01/SB/JHy/26532402v1

Dear Sir and Madam

## **Representation to Proposed Submission consultation for the Lewisham Local Plan (Regulation 19) on behalf of Tesco Stores Ltd**

### **Introduction**

Lichfields has been instructed by our client, Tesco Stores Ltd (hereafter referred to as 'Tesco'), to review the draft Lewisham Local Plan ('LLP') having regard to its retail store and property interest at Conington Road, Lewisham, SE13 7PY, and to submit a representation to the Proposed Submission consultation for the LLP (Regulation 19).

Our representation therefore provides commentary on the following draft site allocation and planning policies:

- Site Allocation 5: Land at Conington Road and Lewisham Road (Tesco)
- High Quality Design (Policies QD1, QD4 and QD6)
- Optimising the Use of Town Centre Land and Floorspace (Policy EC13)
- Lewisham Central Area Place Principles (Policies LCA1 and LCA2)
- Retail Car Parking (Policy TR4)

The representation follows and is consistent with Tesco's 9 April 2021 representation to the previous iteration of the Local Plan: The Main Issues and Preferred Approaches consultation (Regulation 18) version.

The reader should also be aware of Astir Living's representation to this Regulation 19 version of the Local Plan (prepared by Boyer), also on the Site Allocation 5 ('SA5') and the above policy topics.

### **Lewisham Tesco Superstore**

The Tesco superstore and petrol filling station at Conington Road lies on the edge of but within Lewisham the town centre. The store has served Lewisham residents and

shoppers since 1987, providing main and top-up food shopping in a highly accessible location, as well as providing local employment (currently 125 full and part time staff as well as a number of apprenticeships). In the last 10-15 years there have been very considerable changes in shopper behaviour and spending across the UK and travel patterns in London. This has manifested in a sizeable reduction in car borne main food shopping at this store.

In 2015, Tesco sold two areas of the original 536 space car park to Meyer Homes for residential-led redevelopment, with a consequential loss of 251 car parking spaces, to the present 285 car parking spaces. Meyer Homes secured full planning permission for a 365 homes mixed use scheme in January 2020 and a s73 variation was approved in December 2021. The site is the subject of LLP SA4 and is presently being built out by Watkins Jones for 'build to rent' homes.

The retail store itself is tired and dated as a retail operation and has long been identified by Tesco for investment through the provision of a modern replacement store, to better serve Lewisham shoppers, as part of more intensive mixed-use development. Such a replacement store also affords the opportunity to provide a building design of better quality and sustainability.

Having reviewed its existing and future expected requirements for this store, Tesco need to replace it with a modern store providing a minimum of c. 2,400 sq m. (25,850 sq ft) net sales area on a single level, served by a minimum of 140 car parking spaces – i.e. a 51% reduction in car parking. The petrol filling station will not be replaced.

Tesco consider that this is the maximum reduction in the size its car parking for this store that can be achieved whilst maintaining the operation and viability of the store, in particular its main food shopping business. In addition, for any redevelopment of the site, Tesco would need a temporary store to be provided on site to ensure continuity of trade up and until a new replacement store is operational.

Tesco, the freehold owner and retail occupier of the area of land covered by LLP SA5, has recently entered into contract with Astir Living, for the specialist housing developer to bring the site forward for residential-led mixed use redevelopment, including the Tesco required replacement and temporary stores, in partnership with Tesco.

## **Site Allocation 5: Land at Conington Road and Lewisham Road (Tesco)**

### **Site Allocation**

Tesco continues to support the principle of 'Land at Conington Road and Lewisham Road (Tesco)' being allocated (SA5) for *"Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, improved walking and cycle routes and along the river"* (para 14.42).

We would, however, encourage that the below **additions** are added to the description of the site allocation.

*"Comprehensive mixed-use redevelopment with **replacement large retail store**, compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, **car and cycle parking**, improved walking and cycle routes and along the river"*.

## **Indicative Development Capacity**

We appreciate and agree that the development capacity is indicative and is a matter to be determined through detailed design and planning processes and that “*development proposals must use the design-led approach to make the best use of land and optimise the capacity of the site*” in accordance with draft Policy QD6 (Optimising site capacity).

As is previously mentioned, Tesco seek to remain on Site, requiring, however, a podium level store which measures c.2,400sq m net sales area to meet Tesco’s operational requirements. This is a fundamental requirement in unlocking this Site for comprehensive redevelopment and retaining employment in the Borough. We would therefore recommend that the indicative development capacity explicitly identifies a replacement Tesco Supermarket for c.2,400 sqm net sales area (Class E).

With regard to the indicative residential capacity, whilst we note the modest increase from 380 homes in the regulation 18 version of the Local Plan, to 407 homes, we still consider this to be a significant underestimate for this highly accessible ‘Major Centre’ site (PTAL 5-6b), next to the station and adjacent to the under-construction Conington Road development, including one building up to 35 storeys, indicating much greater optimisation is possible.

We would encourage that the uplift in residential floorspace is reconsidered and increased, having regard to the location and site-specific considerations. Your ‘standard method’ for an Opportunity Area site with a central setting and 5-6b PTAL, indicates a capacity of (1.53 ha x 450 dwellings/ha) 689 homes.

## **Development Guidelines**

We note that Development Guideline 9 states that “*Development should allow for the retention and/or re-provision of the bus stop and stand facility that are currently provided on this site*”.

We consider that any prescriptive requirement for the retention or reprovision of a bus stop on-site is unnecessary and would materially impact on the ability to optimise the site’s development. The site benefits from close proximity to Lewisham station interchange and a number of bus stops (serving a number of routes) on Lewisham Road and Station Road. We therefore recommend that Development Guideline 9 is deleted.

## **High Quality Design (Policies QD1, QD4 and QD6)**

### **Delivering High Quality Design in Lewisham (Policy QD1) and Optimising Site Capacity (Policy QD6)**

Tesco is supportive of LBL’s overarching aim at Policy QD1 to ensure that proposals deliver a high-quality design which contributes to the delivery of inclusive, safe, healthy, liveable, and sustainable neighbourhoods in Lewisham.

In particular, Tesco supports the Draft Plan’s Design Led Approach to development proposals, through policies QD1 and QD6 that “*development proposals must use the design-led approach to make the best use of land and optimise the capacity of a site.*”

Tesco also support the flexibility at Policy QD6 Limb C regarding the below indicative capacities and development parameters in the draft allocations:

*“Development parameters for specific sites are set out in this Local Plan (Part 3 - site allocations). Where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) [Design Led Approach] and (B) [Criteria for establishing maximum capacity of the site] above.”*

### **Building Heights (Policy QD4)**

Policy QD4 (Building Heights) does not consider the design led approach when considering building heights. Whilst Tesco support part C of the policy, which states tall buildings within Lewisham town centre should be between 16 to 35 storeys, the Site (SA5) is only considered to be appropriate for buildings which are a maximum of 16 storeys.

Given the ‘Major Centre’ location, the sites high accessibility of PTAL 5-6b, adjacent to a multi service transport node and close proximity to a number of tall buildings, including the under construction Conington Road (up to 35 storeys) and Lewisham Gateway developments, it is indicative that greater optimisation and building heights on the site should be achieved (than 16 storeys). The exact heights and densities would be dependent on the design led approach to development and its assessment.

Accordingly, we would encourage Policy QD4 to include a reference to the need to justify buildings heights on a design-led approach, in accordance with London Plan Policy D3 (Optimising Sites through a Design-Led Approach) and Policy D9 (Tall Buildings) (2021) and Policy QD6. Alternatively, if heights are specified, this should include text such as *‘these are indicative height guidelines to inform and allow flexibility required by a design-led approach.*

### **Optimising the Use of Town Centre Land and Floorspace (Policy EC13)**

Tesco support the principle of draft LLP Policy EC13, namely that development proposals should optimise the use of land and floorspace within town centres and at edge-of-centre locations.

We would encourage text to be added to the draft policy supporting greater optimisation in town centre locations with the greatest PTAL locations (5, 6a or 6b) such as Lewisham Town Centre.

### **Lewisham Central Area Place Principles (Policy LCA1 and LCA2)**

Tesco continues to welcome the vision and spatial objectives for Lewisham’s Central Area Place Principles, including its focus on the town centre of Lewisham, identified as a “Major Centre” and “Regeneration Node”, as identified at ‘Figure 14.2: Central Area key diagram’ .

Tesco supports the ambition of Policy LCA2B (b) to support *“Continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre of sub-regional significance in London is a strategic priority”*.

### **Retail Car Parking (Policy TR4)**

We observe that draft LLP Policy TR4B has been updated to meet the parking requirements and standards set out in the now adopted London Plan. It is noted that at Paragraph C it states that *“Development proposals must not exceed the maximum car parking standards set out in the London Plan”*. This includes retail parking. The London Plan Table 10-5 identifies the maximum retail car

parking standard to be car free (with exception of disabled persons parking) for areas of PTAL 5-6, which would on face value, apply to any retail schemes in Lewisham Town Centre.

The approach to retail parking in the LLP must though now reflect the change at limb G of the adopted LP policy T6.3, arising from a policy modification required by the SoS to enabling a less restrictive approach to retail car parking to apply in specified circumstances. Specifically, TC6.3G states:

*“G. Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:*

*a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach.*

*b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.”*

Over time, there are likely to be further reductions in parking demand associated with large scale food retail sites, and a rise in online deliveries. Nonetheless, pre-pandemic, more than 80% of UK shoppers still carried out a weekly/fortnightly main food shop. The volume of purchases made at a typical weekly/fortnightly shop often means that transporting goods on foot, cycle or by public transport is unfeasible. Therefore, whilst there remains a public desire to shop in this way, it will be necessary to provide appropriate levels of car parking for large foodstores to remain viable, including those in London where car usage is less.

A reduction in car parking demand, the use of alternative modes of travel and increase of on-line shopping over time has been evident at the Tesco superstore in Lewisham. However, car borne main food shopping trips do continue to comprise a sizeable proportion of the store’s turnover. Tesco would not proceed with redevelopment of this store to achieve significant development intensification, if it meant any required replacement store in the town centre PTAL5-6b location had to be served by a level of car parking provision less than that required by expected customer demand.

To do so would undermine both the store’s trading and redevelopment viability to the detriment of the Tesco business, shoppers and the vitality and viability of Lewisham town centre. This is not just a commercial consideration for Tesco (or any supermarket retailer) but a planning consideration for the vitality and viability of Lewisham Town Centre, risking the consequential loss of trade to out of centre stores, resulting in trade loss to the town centre, as well as less sustainable travel patterns and additional CO2 emissions.

Accordingly, we recommend an additional paragraph is added to the explanation of policy TR4B(c.) on Retail Parking to address the above.

## **Concluding remarks**

We trust our representations will be taken into consideration in the progression of the emerging Lewisham Local Plan. We would be grateful for the opportunity to meet with you to discuss our suggested amendments to the above policies and the Lewisham SA5 allocation. Please contact me or my colleague Josh Hymer in that regard.



Yours faithfully

*Steven Butterworth*

**Steven Butterworth**  
Senior Director



Land at Conington Road and Lewisham  
Road (Tesco), SE13 7PY

Regulation 19 Stage - Representations



**Boyer**



## Report Control

Project:	Tesco, Conington Road, Lewisham, SE13 7PY
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# 1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of our client, Astir Living Limited ('Astir') in relation to the Draft Lewisham Local Plan 'Proposed Submission Document – Regulation 19 Stage' (January 2023) ('Draft Local Plan').
- 1.2 In responding to this consultation, these representations make specific reference to the Land at Conington Road and Lewisham Road (Tesco), Lewisham, SE13 7PY' ('the Site'). The Site is currently under the ownership of Tesco, however, Astir has acquired an interest in this Site and seeks to bring the Site forward, as the developer, in partnership with Tesco, the landowner and retail occupier.
- 1.3 Astir recognise the importance of early engagement as part of the Local Plan process and accordingly, they would have sought to engage at the Regulation 18 Stage "Main Issues and Preferred Approaches". However, as Astir have only recently secured a legal interest in the Site, the Regulation 19 consultation has been the earliest point at which they have been able to engage in the Local Plan process. Nevertheless, as the landowner, Tesco submitted representations to the previous iteration of the Local Plan 'The Main Issues and Preferred Approaches consultation (Regulation 18)'.
- 1.4 The Site is located within the New Cross, Lewisham, and Catford Opportunity Area (OA), as is set out in the London Plan (2021). The Site is also located within Lewisham Town Centre and is allocated within the Lewisham Town Centre Local Plan (2014), under the Conington Road Policy Area, as site S6. This allocation is to be carried forward within the Draft Local Plan, under Site Allocation 5 (SA5), which seeks to ensure that the Site is comprehensively redeveloped to provide a mix of residential, employment and town centre uses.
- 1.5 Astir seek to satisfy the aims of SA5, whilst also optimising the Site to ensure the best use is made this key town centre location. This involves a comprehensive mixed use redevelopment of the Site, to provide a replacement Tesco store, alongside a range of residential uses, that could include build-to-rent (BtR) units, a care home, student housing, purpose built student accommodation (PBSA) and an aparthotel, as well as additional flexible commercial floorspace and new public realm.
- 1.6 These representations set out Astir's response to specific sections within the Draft Local Plan. In particular, they focus on how the Draft Plan can better facilitate the delivery of a comprehensive mixed use development of the Site, whilst continuing to recognise the London Borough of Lewisham's (LBL) support for its redevelopment.
- 1.7 These representations should be reviewed alongside the most recent pre-application package submitted to LBL on the 29<sup>th</sup> of March 2023 (Ref – PRE/23/131012).
- 1.8 Responses are provided to the following sections of the Draft Local Plan:

- 5. High Quality Design;
- 7. Housing;
- 8. Economy and Culture;
- 11. Sustainable Design and Infrastructure;
- 12. Transport and Connectivity;
- 14. Lewisham's Central Area – Key Spatial Objectives; and
- 14. Lewisham's Central Area – Site Allocations.

### **Structure of Statement**

1.9 This Statement is structured as follows:

- Section 2 sets out our interest in the Draft Local Plan;
- Section 3 sets out our response to the 'Proposed Submission Document – Regulation 19 Stage' consultation document and provides commentary on specific sections and issues; and
- Section 4 provides a summary and conclusion.

## 2. OUR INTEREST

- 2.1 This Section describes our clients' interest in the 'Proposed Submission Document – Regulation 19 Stage' consultation.

### **Astir**

- 2.2 Astir is an established owner, developer, and manager of living spaces, aspiring to transform the living sectors in the UK. Astir aims to set a new standard for sustainability in residential development, ensuring that places are designed, built, and operated in a highly sustainable manner. Their vision is to create multi-use, mixed tenure communities established through a range of long- and short-term accommodation options for all stages of life. These spaces will be accompanied by commercial, and retail uses to provide doorstep amenity for residents and the wider community.
- 2.3 Astir are bringing forward this application in partnership with Tesco, who will remain on-site as a key employer. As the landowner and supermarket operator, Tesco's requirements are central to the scheme's success. It is critical that the scheme can come forward with the support of Tesco and without prejudicing their primary business, a highly competitive supermarket business.

### **Tesco**

- 2.4 Tesco have very specific requirements in order to operate effectively and efficiently. These are fundamental to unlocking the Site for a comprehensive mixed use development. These representations seek to outline how the Draft Local Plan should better consider the requirements in bringing forward the proposed Site.
- 2.5 In addition to a replacement store, Tesco would need a temporary store in this location to ensure continuity of trade up until a new replacement store is operational.
- 2.6 The Tesco Lewisham Superstore opened in 1987. Approximately 125 people are employed in the store and a number of apprenticeships are provided every year. In addition to the store in Lewisham, Tesco have a superstore in the Catford Shopping Centre and nine express stores. Therefore, Tesco are a major employer in the LB of Lewisham. Since 2016, the Tesco Community Grant programme has provided over £311,000 of funding to 141 local projects in Lewisham. All Tesco stores in the borough also participate in the Community Food Connection programme, which donates surplus food to charities and foodbanks.

### **Land at Conington Road and Lewisham Road (Tesco)**

#### *Site and Surrounding Context*

- 2.7 The Site, which measures 1.53ha, currently accommodates a Tesco Superstore and petrol filling station (PFS) which is nearing the end of its useful life. Our client, Astir, have recently acquired an interest in the Site and seek to bring it forward for development with delivery anticipated within the next five years.

- 2.8 The Site is situated on the south side of Conington Road and the west Side of Lewisham Road. The existing buildings are approximately three residential storeys in height. The building is of no architectural merit or interest.
- 2.9 The Site has an open surface car park at its eastern end which provides access to a below-ground parking level. Cars exit the basement parking onto an access road of Conington Road which divides the main store from the PFS. This access road also enables access to a surface-level servicing and deliveries bay. Eagle House is located in the south-eastern section of the Site; it is a non-designated heritage asset that is ancillary to the Main Tesco Superstore.
- 2.10 The Site is bounded to the west by the River Ravensbourne and accompanying footpath (Silk Mills Path) and there is also a sewer running along the edge of and through the Site's western edge.
- 2.11 The Site is highly accessible as it benefits from a PTAL of 6b (highest possible rating). Lewisham mainline and DLR stations are located approximately 300 metres south-west of the site. The Site is also served by various bus stops which are located in close proximity to the site. The Site will also benefit from the proposed extension to the Bakerloo Line from Elephant and Castle to Lewisham and beyond.
- 2.12 The Site is located within the New Cross, Lewisham, and Catford Opportunity Area (OA), as is set out in the London Plan (2021). The Site is also located within Lewisham Town Centre and is allocated within the Lewisham Town Centre Local Plan (2014), under the Conington Road Policy Area, as site S6. This allocation is to be carried forward within the Draft Local Plan, under Site Allocation 5 (SA5), which seeks to ensure that the Site is comprehensively redeveloped to provide a mix of residential, employment and town centre uses.
- 2.13 Under the Draft Local Plan, the Site is considered to be an appropriate location for tall buildings, and forms part of a Regeneration Node. Under SA5, LBL envisage the Site to be delivered within 10 years of the Local Plan being adopted.

#### *Planning History*

- 2.14 Astir have engaged in an initial pre-application meeting with LBL on the 23<sup>rd</sup> of July 2021 (Ref – PRE/21/122226). This meeting focused mainly on the principle of development, site constraints and the capacity of the site to accommodate development. Feedback was also provided on the consequent scale and massing strategy. Formal feedback was issued on the 18<sup>th</sup> of August 2021. Officers were supportive of the principle of redeveloping the Site, stating that *“the proposed mixed-use re-development of the site and the opportunities of enlivening and restoring the river is supported”*.

- 2.15 A second pre-application request has since been submitted, on the 29<sup>th</sup> of March 2023 (Ref - PRE/23/131012). The proposals submitted under this request have evolved in accordance with Officer comments provided as part of the initial meeting and the Site allocation requirements in both the emerging and adopted local plan's. Similarly, a Level 2 pre-application request was submitted to the Greater London Authority (GLA) on the 14<sup>th</sup> of April 2023.
- 2.16 The proposals submitted as part of these pre-application requests seek to deliver a comprehensive mixed use redevelopment of the Site, to provide a replacement Tesco store, alongside a range of residential uses. The residential uses include a minimum of 500 build-to-rent (BtR) units, 35 later living units and 60 care bedrooms, purpose built student accommodation (PBSA) and a 380 bedroom aparthotel, as well as additional flexible commercial floorspace and new public realm.
- 2.17 We will of course engage in further pre-application meetings in order to inform the proposals for the Site. Following a period of pre-application and based on evolving discussions, we intend to submit an application towards the end of the year (2023).
- 2.18 We acknowledge that the current development plan allocates the Site for a comprehensive mixed use development, including residential, commercial and town centre uses. We also recognise that care, PBSA and hotel uses are encouraged in town centre location's. Our client wholly supports the continuation of policy support as part of the emerging Local Plan.



### 3. RESPONSE TO ‘PROPOSED SUBMISSION DOCUMENT – REGULATION 19 STAGE’

3.1 We set out below our response to the relevant sections and issues in the Draft Local Plan consultation document published by the Council.

#### 5. High Quality Design

3.2 LBL’s overarching aim is to ensure that proposals deliver a high-quality design which contributes to the delivery of inclusive, safe, healthy, liveable, and sustainable neighbourhoods in Lewisham.

##### *High-Quality Design and Optimising Site Capacity*

- 3.3 In particular, we are supportive of the Draft Plan’s approach to achieving high-quality design through a design-led approach, as is stipulated under Policy QD1 (Delivering High Quality Design in Lewisham). We agree that proposals should give consideration to various design-options at the early stages of the development process through an understanding of the Site and its local context. Furthermore, we support Policy QD1’s acknowledgement that recognition should be given to ensuring the most optimal use of the land, given the need to meet the spatial strategy for the Borough, and in particular housing delivery.
- 3.4 The continued emphasis on adopting a design led approach through Policy QD6 (Optimising Site Capacity) is also supported, particularly as such an approach is key in making the best use of land and optimising the capacity of a site. The policy also recognises that consideration needs to be given to the type and nature of uses.
- 3.5 Accordingly, the design led process for SA5 has given due to consideration to the proposed uses. One of the key uses comprises the Tesco. As part of the proposals, Tesco require its replacement store to have a minimum net sales area of c.2,325 sqm (25,000 sq.ft.) which is to be provided at podium level. Tesco have made clear that this quantum is necessary to support the operation and viability of the store. The proposals seek to satisfy all requirements of Policies QD1 and QD6, as part of the design-led process.
- 3.6 We are also supportive of supporting paragraph 5.49 which states that “*commercial developments should seek opportunities to intensify uses on employment sites to deliver more jobs*”.
- 3.7 Furthermore, we welcome the flexibility allowed for proposals on allocated sites. We note that policy stipulates “*where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated that the optimal capacity will be achieved, having regard to Policy QD6*”.

### Tall Buildings

- 3.8 Policy QD4 (Building Heights) does not consider the design led approach when considering building heights. Whilst we support part C of the policy, which states tall buildings within Lewisham town centre should be between 16 to 35 storeys, the Site (SA5) is only considered to be appropriate for buildings which are a maximum of 16 storey's. This is evidenced in figure 5.5 below.

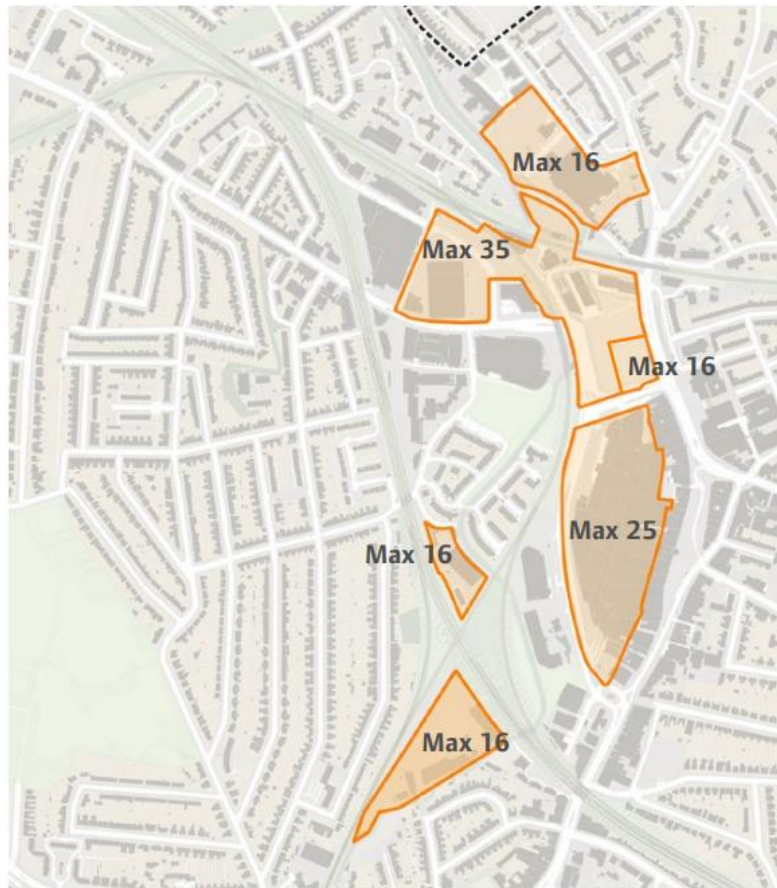


Figure 5.5: Lewisham tall building suitability zones

- 3.9 We consider that a maximum limit should not be applied when considering building heights and therefore object to Policy QD4. We recognise that London Plan Policy D9 (Tall Buildings) (2021) stipulates that when determining locations for tall buildings, these should be identified in maps in Development Plans. We also recognise that supporting paragraph 3.9.2 states that in these locations a maximum height could be applied. However, the term 'could' infers that maximum heights should be predicated on an assessment of the existing and prevailing context, as well as, other factors including, but not limited to townscape and impact on views. Instead, Policy QD4 should include a reference to the need to justify buildings heights on a design-led approach, in accordance with London Plan Policy D3 (Optimising Sites through a Design-Led Approach) (2021) and Policy QD6.

- 3.10 Thus far, through our initial pre-application submission's, we have demonstrated that the Site is able to facilitate a building which is over 28 storeys in accordance with Policy QD4. This has been achieved by developing the proposals through a comprehensive design-led approach which has taken into consideration the existing and emerging local context. The site analysis has identified that the Site presents a significant opportunity to enhance the area, architecturally and in terms of public realm improvements. The emerging proposals are designed to a very high quality, are well-considered and contribute to the legibility of the urban structure, at a point of townscape prominence. The proposals also have the opportunity to complete the emerging Lewisham Town Centre cluster and define its northern edge. The stepping of height through the Site would contribute positively to the existing and emerging skyline.
- 3.11 The proposals have also been supplemented by a Preliminary Townscape Review prepared by Montagu Evans, which confirms that the gaps between the buildings, different height, and taper, combined with the location of the proposals mean that in distant and medium distant views of the skyline, the proposals contribute to a more cohesive profile, with sufficient gaps and differences in height to create a layered effect. The report also confirms that the disposition of surrounding development and landform means there is no real impact on the amenity of settled and traditional residential streets.
- 3.12 However, it has been recognised through the initial pre-application feedback (Ref – PRE/21/122226) that the maximum building height of 16 storey's has been informed by an indicative masterplan developed by EPR for the Conington Road, Meyer Homes (Site Allocation 4 – SA4). This masterplan does not carry any material weight and was only developed as an indicative layout as part of the application for SA4. The layout and height's shown by EPR can only be considered indicative as they were not informed by a technical analysis, such a review of its townscape impact or its impact on daylight and sunlight. Therefore, the indicative masterplan has not been robustly tested and cannot be used to set parameters for SA5.
- 3.13 Moreover, the indicative masterplan prepared by EPR, for the Meyer Homes scheme, did not consider that the owner of the site would seek to remain on site and therefore retain a large Tesco supermarket. The lack of consideration for Tesco's requirements further undermines the validity of the indicative masterplan as a basis for SA5. Tesco's intention to remain on site as a key local employer fundamentally changes the masterplan opportunities, moving proposals away from the indicative masterplan which was based on a permeable network of routes through at-grade courtyards. With Tesco remaining on-site the proposals need to accommodate a large superstore, which is through a podium based development. Whilst this has resulted in additional height, the proposals submitted to date demonstrate that Tesco's operational and spatial requirements can be balanced with the requirements of the Draft Local Plan.

- 3.14 Given the Site's 'Major Centre' location, its high accessibility (PTAL – 6b) and proximity to a multi-service transport node, as well as to a number of tall buildings including the under construction Conington Road (up to 35 storeys) and Lewisham Gateway development's, it is indicative that greater optimisation and building heights on the site should be achieved. The exact heights and densities would be dependent on the design led approach to development.
- 3.15 Furthermore, the proposals have been developed in accordance with London Plan Policy D9. This process has demonstrated that the visual, functional, and environmental impacts of a 29 storey building should be considered acceptable. It is also concluded that the Site is considered to be an appropriate location for tall buildings, as is evidenced in the Draft Local Plan. This is also as a result of the Site's location in Lewisham Town Centre, proximity to a number of tall buildings including the under construction Conington Road (up to 35 storeys) and Lewisham Gateway development's, its high PTAL (6b) and its proximity to local services.

## 7. Housing

- 3.16 LBL's overarching objective is to work positively and proactively with stakeholders to facilitate a significant increase in the delivery of new homes to help meet Lewisham's housing needs.

### *Housing Supply & Delivery*

- 3.17 We support LBL's endeavour to exceed the ten-year London Plan (2021) target of 16,670 (1,667 p.a.) under Policy HO1 (Meeting Lewisham's Housing Need) and its aim of directing housing to town centres and well-connected locations. We also support part C (e) of Policy HO1 which seeks to ensure that proposals make the best use of land and optimise housing sites.
- 3.18 However, we disagree and object to the lack of flexibility that is applied to proposals on allocated sites. This is evidenced under Part C (b), where it states that "*a carefully managed uplift in the delivery of housing will be achieved by locating strategic sites for new housing, including mixed-use development, and supporting development proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these*". The Draft Plan fails to acknowledge that proposals on allocated sites, should still seek to follow a design-led approach, in turn contradicting part C (e). Whilst we recognise the need to satisfy the development guidelines under site allocations, it should be noted that these are indicative, and alternative design-led solutions, with increased quantum can be achieved whilst fulfilling the requirements of the allocation.
- 3.19 We propose that Policy HO1 allows for allocated sites to explore capacity for additional homes, through a design-led process. This is relevant within the context of a higher housing target under the Draft Local Plan, as well as poor housing delivery and supply within LBL. These factors place greater importance on promoting housing delivery, exceeding the target of 1,667 homes per annum and removing references under Policy HO1 which suppresses housing delivery. Accordingly, these factors are discussed in more detail below.

- 3.20 The Draft Local Plan sets a higher target of 1,667 homes p.a. This figure comprises a 2,825-uplift compared to the previous London Plan (2016) which identified a need of 13,847 dwellings between 2015- 2025 or 1,385 units per annum. With regards to housing delivery, under the most recent Housing Delivery Test results (HDT) (2021), Lewisham scored 87%. As a result, Lewisham would have been required to prepare and deliver an Action Plan which would demonstrate how the Council aims to compensate for the shortfall in housing delivery. HDT results for 2022 are yet to be published by the Government.
- 3.21 However, Lewisham has since provided updated housing delivery figures within their Annual Monitoring Report (AMR) for 2021-2022 (December 2022). Within this document, Lewisham outline that between 2021- 2022, a total of 599 homes were delivered. When considering this figure against an annualised target of 1,667 dwellings under Policy H1 of London Plan (2021), Lewisham achieve a reduced HDT score of 56% for 2022. The consequence of this is that the titled balance at paragraph 11(d) of the NPPF is activated meaning that applications for housing development should be granted unless the adverse impacts of development significantly and demonstrably outweigh the benefits.

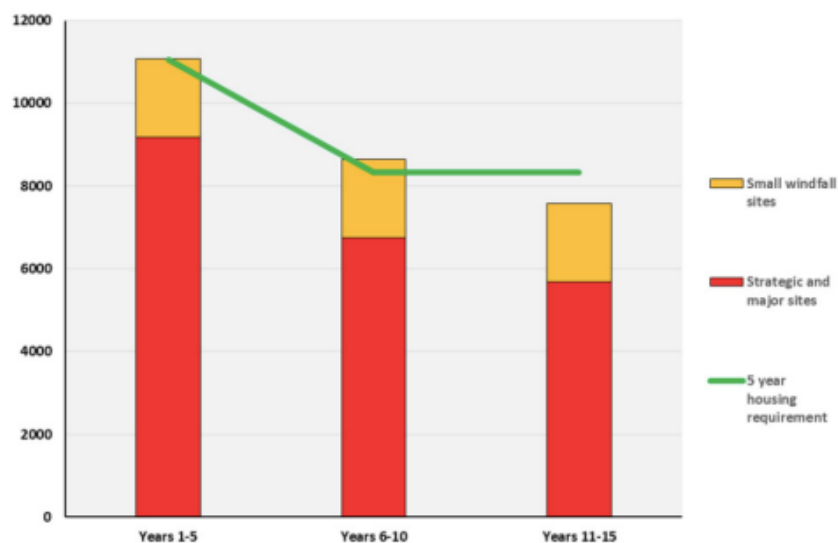
Number of Homes Required			Total	Number of Homes Delivered			Total	HDT Measurement	HDT Consequence
19/20	20/21	21/22		19/20	20/21	21/22			
1,526	1,110	1,667	4,303	1,284	523	599	2,406	56%	Presumption

- 3.22 Furthermore, the AMR recognises that housing delivery has been suppressed in the past 2-3 years and attributes this to the impacts of the Covid-19 Pandemic, the impacts of Brexit on the construction industry and delays in bringing forward larger sites. Paragraph 2.23 states that *“Lewisham seems to have been particularly badly affected by Covid-19 with a number of large sites stalling during this period. Viability issues due to the increase in construction costs, delays in the delivery of infrastructure due to a decrease of available funding, a reliance on private development schemes, multiple land ownerships, slower build out of tall buildings, extended Section 106 negotiations, pre-commencement conditions, variations to sites through the submission of Section 73 and Section 96 applications and the impact of Brexit on the construction industry have also combined to markedly suppress the delivery of new homes during 2021-22”*. Confidence in Lewisham’s ability to sustain and increase future housing delivery is also questioned, due to market uncertainties exacerbated by the Cost-of-Living Crisis.
- 3.23 The likelihood of continued difficulties in LBL meeting their HDT is further compounded by an increased annualised housing target of 2,212 dwellings per annum for the next five years (2023-2028). This figure is predicated on:

- The London Plan Housing Target – 1,667 dwellings per annum;
- An Appropriate Buffer – at 5%, equivalent to 415 dwellings per annum; and
- A Backlog since the Start of the London Plan Monitoring Period – 462 dwellings per annum.

3.24 Nevertheless, the AMR estimates an adequate but marginal supply of housing during this period, equating to 11,116 homes between 2023-2028 or a 5.03-year housing land supply. Similarly, supply in the first ten years is also sufficient at 8,645 dwellings. However, as per Chart 5 below, there appears to be a shortfall of 761 dwellings between the 11th and 15th year towards the end of the Local Plan period. The council acknowledge the need to address this shortfall, by stating that it will *“need to work with developers and its partners to find an additional supply of longer-term sites to bridge this gap.”*

3.25 However, with an increased difficulty in satisfying the HDT in the short-term, this is likely to result in an overall worsening outlook for housing supply, in both the short and long term. With an inevitable presumption in favour of development, this will result in a larger buffer of 20%, in turn, reducing the council’s supply down to 4.52 years and placing greater pressure to increase housing supply.



**Chart 5: Future Supply of Housing Against Housing Target**  
 Source: GLA Monitoring System and LB Lewisham

3.26 Furthermore, of the 11,116 homes planned in the first five years, 21% are yet to undergo construction and are either only a draft allocation, at pre-application stage, or constitute previously lapsed permissions. With pending economic uncertainty, it can be presumed that many of these sites are likely to face delays pushing delivery into later years and further reducing immediate supply.

- 3.27 Policy HO1 should recognise that proposals (including allocated sites) may be able to achieve a higher quantum of housing, than the indicative figures stipulated within the Draft Local Plan. For example, the proposed Site (SA5), it likely to be able to facilitate a greater quantum than the 407 units identified under SA5. This has been evidenced through a design-led process and seeks to optimise the site. The additional dwellings on SA5 will contribute significantly towards Lewisham achieving its annualised target of 2,212 dwellings per annum for the next five years (2023-2028). As is identified within the AMR, additional supply needs to be secured in order to compensate for a potential increase in housing supply requirements, associated with Lewisham's inability to satisfy its future HDT.

#### *Unit Mix*

- 3.28 We support Policy HO1's approach to determining an appropriate housing mix and its aim to provide an appropriate mix of units, between 1 to 3 bedrooms which reflects the local need and town centre location. In particular, we support Part F, which recognises that proposals providing mostly 1 or 2 bedroom units can be considered acceptable. Either if they are located in an area with a PTAL of 3-6 or, where they are only able to provide a mix comprising smaller units due to the site configuration and development constraints.

#### *Accommodation for Older People*

- 3.29 We are supportive of Policy HO5 (Accommodation for Older People) and its aim to direct care accommodation towards town centre locations which are accessible by public transport and provide good access to community facilities. Whilst we recognise that Policy HO5 stipulates a need for 100 units p.a. from 2017 to 2029, this should be a minimum target in order to meet the needs of an ageing population. This is predicated on guidance at a national, regional, and local level, all of which anticipate a greater need for care accommodation in the future.
- 3.30 At a national level, Planning Practice Guidance (PPG) makes clear that the need to provide housing for older people is critical (paragraph: 001 Reference ID: 63-001-20190626). The guidance states that where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need (paragraph: 016 Reference ID: 63-016-20190626). The emphasis on planning for care accommodation is further evidenced within the Draft National Planning Policy Framework (December 2022). Paragraph 63 states that when establishing housing need, due consideration should also be given to retirement housing, housing with care and care homes.
- 3.31 At a regional level, paragraph 4.13.1 of the London Plan (2021) recognises that the need will only increase, stating that "*by 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent*". When considering this growing need within the context of a housing crisis, greater importance is placed on increasing the supply of care accommodation to allow older persons the choice to move to specialised accommodation, in turn freeing-up existing housing stock. The need to increase this choice is supported by London Plan Policy GG4.

- 3.32 At a local level, the most recent AMR (2021-22) also highlights that the number of households headed by someone aged 65 or over is expected to increase dramatically by 62% by 2040. Lewisham ageing population is increasing and demonstrates a need to ensure adequate accommodation is planned for in advance.

## **8. Economy and Culture**

- 3.33 LBL's overarching objective is to enhance the viability and vitality of town centres and to support the local economy.

### *Town Centres*

- 3.34 We are supportive of LBL's aim to ensure that town centres are more resilient and adaptable to future challenges, as is highlighted under Policy EC11 (Town Centres at the Heart of Our Communities). We welcome Policy EC11's objective to deliver a mix and balance of residential and main town centre uses in order to attract visitors and ensure people have good access to a competitive range of services and facilities, as well as to support businesses and grow the local economy through provision of a wide range of workspaces and premises.
- 3.35 Similarly, we are supportive of Policy EC13 (Optimising the Use of Town Centre Land and Floorspace) which seeks to reconfigure and optimise existing sites containing town centre uses, such as supermarket's and other retail uses. Many of these sites are underutilised and comprise buildings of 1-2 storey in height.
- 3.36 We also welcome Part D of Policy EC13 which recognises that development proposals affecting an existing commercial unit must ensure that any ancillary floorspace that is integral to business operations and viability of the unit is not lost or compromised. However, we propose that the scope of Part D is widened to cover all town centre uses, not just commercial.
- 3.37 This is of particular relevance when considering the proposed Site (SA5). The proposed redevelopment of the Site comprises a replacement Tesco store (a minimum of 2,400 sqm net sales area) which will be provided at podium level. Tesco have specific requirements driven by their business model and operational requirements. As mentioned, Tesco's requirements in regard to retaining an operational store at the Site are central to the scheme's success and Tesco must be satisfied with the consented proposals to enable the proposed redevelopment to come forward without prejudicing their highly competitive supermarket retailing business.
- 3.38 Within the context of needing to maintain and enhance the vitality and viability of town centres, it is important that Policy EC13 provides further support for main town centre uses when being provided as part of a mixed use development.



*Visitor Accommodation*

- 3.39 We support Policy EC21 (Visitor Accommodation) which promotes hotel uses in highly accessible town centre locations, where there is a good level of public transport accessibility.

**11. Sustainable Design and Infrastructure**

- 3.40 LBL's objective is to work towards achieving carbon neutrality ahead of 2050 and facilitate action to take a strategic and coordinated approach to the climate change emergency.
- 3.41 We are wholly supportive of LBL's initiative to respond to the climate emergency as part of Policy SD1 (Responding to the Climate Emergency), particularly through initiatives such as:
- Becoming a net-zero carbon borough;
  - Protecting and maximising opportunities to enhance the green network;
  - Implementing flood risk mitigation measures;
  - Protecting and enhancing biodiversity; and
  - Achieving waste self-sufficiency.

**12. Transport and Connectivity**

- 3.42 The overarching objective of this section is to provide a safe, sustainable, and convenient transport network, which will encourage a step change in active travel behaviour.
- 3.43 We are supportive of the Draft Local Plan's aim to encourage the use of sustainable transport and active travel modes as is outlined under Policies TR1 (Sustainable Transport and Movement). We also, welcome Part A of Policy TR4 (Parking) and its aim to carefully manage the approach to car parking provision, in the interest of reducing reliance on car use.
- 3.44 However, we object to Policy TR4, Part C, which states that development proposals should not exceed the maximum car parking standards as set out in the London Plan for retail uses. This position was reflected as part of initial pre-application discussions for the proposed Site (SA5) (Ref – PRE/21/122226) in which officers expressed that the *"on-site customer parking is too high and contrary to the London Plan. Officers expect a significant reduction in customer parking provision, appropriate for a town centre with excellent transport connections"*.

- 3.45 LBL's position is contrary to the work undertaken by TPA who are acting on behalf of Astir. TPA have conducted a parking accumulation study, based on Tesco's minimum requirement for 140 spaces. The study shows that there would only be surplus of 16 spaces. This should therefore justify a level of parking to be re-provided for the new Tesco store, albeit that there will be a significant reduction compared to the current situation, from 285 to 141 (-51%). In other words, a significant absolute and relative reduction in the car parking is proposed. TPA are engaging in a separate highways pre-application meeting with the LB of Lewisham. Details of their assessments will be enclosed as part of the separate pre-application submission.
- 3.46 Whilst TPA's work indicates the surplus demand only amounts to 16 vehicles, the proposals will also be supported by a Framework Travel Plan (FTP) which will propose a suite of measures to encourage uptake in active and sustainable modes of travel.
- 3.47 The approach to retail parking under Policy TR4 should now reflect the change at Part G of London Plan (2021) Policy T6.3 (Retail Parking). This change stems from a policy modification required by the Secretary of State (SoS) and it seeks to enable a less restrictive approach to retail car parking in specified circumstances. London Plan Policy T6.3, Part G states that:
- "G. Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:*
- a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach.*
- b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre."*
- 3.48 Policy TR4 Part C also fails to recognise that whilst the Site is located in a sustainable location, private vehicle's offer customers convenience when purchasing their 'weekly shop'. Insufficient car parking would, in turn, limit the number of car-borne customers visiting the store and therefore result in a reduction in footfall and turnover, potentially leading the replacement Tesco store being unviable and fetter the deliverability and redevelopment of the Site. Tesco will not release the Site for redevelopment if there is insufficient car parking to underpin the store's viability.
- 3.49 In order to facilitate the proposed car parking provision, residential provision has been minimised to (24 spaces) to promote more sustainable forms of transport whilst providing disabled persons' parking spaces as required.

#### **14. Lewisham's Central Area – Key Spatial Objectives**

- 3.50 This section outlines LBL's vision for Lewisham Town Centre as a key area for regeneration and its role as a 'Major Centre'.

- 3.51 We support Policies LCA1 (Central Area Place Principles) and LCA2 (Lewisham Major Centre and Surrounds) and their recognition of Lewisham Town Centre being a “*Major Centre*” and “*Regeneration Node*”, as is seen at ‘Figure 14.2: Central Area key diagram’ .
- 3.52 We also support the ambition of Policy LCA2B (b) to support “*Continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre of sub-regional significance in London is a strategic priority*”.

#### **14. Lewisham’s Central Area – Site Allocations**

- 3.53 This section outlines key site allocations within Lewisham Town Centre, and the development guidelines that should inform future development on these sites. This includes Site Allocation 5 (SA5) – the Land at Conington Road and Lewisham Road (Tesco), which is addressed below.

##### *Timescales*

- 3.54 LBL propose that the Site should come forward within the first 10 years of the Draft Local Plan. Astir consider the proposed delivery timescales to be realistic.

##### *Indicative Development Capacity*

- 3.55 We object to the indicative development capacity proposed under SA5. With regards to residential development, the allocation proposes a modest capacity of 407 residential units. We understand that this figure has increased from 380 residential units from the Regulation 18 Stage “*Main Issues and Preferred Approaches*” Emerging Local Plan. With respect to non-residential uses, a total of 7,604 sqm of main town centre uses and 1,901 sqm of employment uses are expected under SA5. Astir seek to understand how LBL has calculated and/or arrived the proposed quantum of residential and non-residential uses.
- 3.56 Our view is that the proposed indicative quantum for residential and non-residential development, should be regarded as a minimum target. The indicative targets constitute a significant under-delivery for the proposed Site and fail to make the best use of this land. To-date the proposals submitted as part of the pre-application process to LBL have been predicated on a design-led approach in accordance with London Plan Policies D3 and D9. In accordance with these policies, we have sought to optimise the Site to deliver an appropriate scale of development with appropriate massing which is able to exceed the range of uses and quantum identified under SA5. Through the design-led approach, the Site’s capacity has been optimised and could facilitate the following uses:

- A Tesco Supermarket with a minimum net sales area of 2,400 sqm (Class E);
- A minimum of 500 BtR units (Class C3);
- A Care Home with a minimum of 35 later living units and 60 care beds (Class C2);
- An Aparthotel with a minimum of 380 rooms (Class C1);
- PBSA; and
- Flexible Commercial and Retail Floorspace (Class E).

- 3.57 As is previously mentioned, Tesco seek to remain on Site, however for this to be financially viable, Tesco have stipulated that they require a podium level store which comprises a minimum net sales area of 2,325 sqm. This quantum meets Tesco's operational requirements and reduces risk to a degree at which it is feasible to redevelop the store without suffering a financial loss. This is a fundamental requirement in unlocking this Site for comprehensive redevelopment and retaining employment in the Borough.
- 3.58 The proposed delivery BtR units seeks to go beyond the indicative capacity of 407 residential units. As is outlined in Section 7 of this Statement, these additional dwellings will provide a valuable contribution towards Lewisham's increased housing target of 2,212 dwellings p.a. over the next five years (2023-2028). We, therefore, encourage that the uplift in residential floorspace is reconsidered and increased, having regard to the location and site-specific considerations. LBL's 'standard method' for an Opportunity Area site with central setting and a PTAL of 5-6b, indicates a minimum capacity of (1.53 ha x 450 dwellings/ha) 689 homes.
- 3.59 The AMR recognises that housing delivery has been suppressed in the past 2-3 years and attributes this to the impacts of the Covid-19 Pandemic, the impacts of Brexit on the construction industry and delays in bringing forward larger sites. Confidence in Lewisham's ability to sustain and increase future housing delivery is also questioned, due to market uncertainties exacerbated by the Cost-of-Living Crisis. This level of poor delivery translates to a HDT measurement of 56% when considering housing delivery figures published within the AMR against the new London Plan (2021) targets.
- 3.60 With an increased difficulty in satisfying the HDT in the short-term, this is likely to result in an overall worsening outlook for housing supply, in both the short and long term. With an inevitable presumption in favour of development, this will result in a larger buffer of 20%, in turn, reducing the council's supply down to 4.52 years and placing greater pressure to increase housing supply.

- 3.61 The poor housing context within LBL places greater importance on the need to re-examine the quantum of housing proposed under SA5, especially as the Site is suitable, deliverable, and sustainable. This is evidenced through the Site's allocation under the Draft Local Plan, as well as Astir endeavour to bring the Site forwards without delays. Furthermore, the worsening economic context, which is recognised within the AMR, gives greater impetus to focus on optimising site's where there is a high degree of certainty that they will come forward, such as SA5.
- 3.62 With regards to the Aparthotel and Care Home, these uses are supported by the Draft Local Plan, particularly Policies HO5 and EC21.
- 3.63 Policy HO5 supports the delivery of older persons accommodation on the proposed Site, given it offers a sustainable and accessible town centre location and close proximity to public transport links and community facilities.
- 3.64 Policy EC21 also supports the delivery of Hotels in town centre locations. The hotel will seek to provide both short and longer stay options, with shorter stays being taken by leisure guests, whilst the longer term options being suitable for corporate guests. The Site's easy access to Greenwich along with the corporate hub Canary Wharf and the City of London make it an ideal location for a short- and long-term hotel for leisure and corporate guests. These benefits associated with the site's proximity to Central London and Canary Wharf is also recognised within paragraph 6.17 of the Town Centre Local Plan. It states that *"Lewisham town centre is within 20 minutes travel of central London and Canary Wharf generating a significant opportunity for hotel development. The Council consider hotels as a suitable town centre use in principle and are, in general, supportive of the idea of the generation of a hotel cluster."*
- 3.65 In addition to the uses above, the proposal will deliver flexible commercial floorspace (Class E) which will include retail and/or office space.
- 3.66 We therefore propose that the uses and associated quantum identified within SA5 are reconsidered recognising our client's design-led approach and the strategic objectives of the Draft Local Plan. The proposed mix of uses seeks to improve the viability and vitality of the town centre, evidenced through its aim to diversify the town centre uses on offer. Further consideration should be given to Paragraph 31 of the NPPF (2021) which states that all policies should be underpinned by up-to-date evidence and should take into account relevant market signals.

#### *Site Allocation & Opportunities*

- 3.67 As is outlined in paragraph's SA5's 3.55 to 3.66 of this Statement, we support SA5's aspiration for the comprehensive re-development of the Site to provide compatible main town centre uses, commercial and residential uses, an improved public realm, new public open space and improved walking and cycle routes.
- 3.68 However, we would encourage that the following additions (underlined) are added to the description of the site allocation under paragraph 14.42:

*“Comprehensive mixed-use redevelopment with replacement large retail store, compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, appropriate car and cycle parking, improved walking, and cycle routes and along the river”.*

*Development Requirements*

- 3.69 We support the development requirements seeking to improve connectivity, maximise active frontages, provide a high-quality public realm and deliver enhancement works to the River Ravensbourne.

*Development Guidelines*

- *DG1 - Development should provide for a complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area.*
- 3.70 We support the DG1 which seeks to provide a complementary mix of uses which support the viability and viability of Lewisham Town Centre. This is evidenced through the delivery of a comprehensive mixed-use development that could deliver BtR units, a Tesco Supermarket, an Aparthotel, a care home, potential PBSA, as well as flexible retail and commercial floorspace.
- *DG2 - The site should function as a transitional site, both in terms of land use and visual amenity, from the surrounding low-rise residential neighbourhoods into the transport interchange, Lewisham Gateway, and the heart of the town centre. The design of development must step down and respond positively to the residential properties at the site’s eastern side, at Conington Road and beyond.*
- 3.71 We object to the requirement for the Site to be functioning as a ‘transitional site’. The term is at odds with London Plan Policy D3 and Draft Local Plan Policy QD6, which seek to optimise site’s through a design-led process. The term fails to recognise that the design-led process would capture and manage impacts on heritage, townscape and the current and emerging context whilst optimising the Site to deliver much needed uses such as housing, town centre uses and other commercial uses. The term ‘transitional’ should not be listed as a requirement, instead it should be acknowledged that the design-led process will result in overall massing and form which is transitional.
- 3.72 The proposals submitted as part of the second pre-application enquiry (Ref – PRE/23/131012) demonstrate this. The proposals comprise an appropriate massing with a range of heights, which are balanced against the need to optimise the quantum of housing, the supermarket, hotel, care home and ground floor commercial and retail uses. The proposed massing has been informed by a technical analysis and has been considered appropriate through a Preliminary Townscape Assessment prepared by Montagu Evans.

3.73 All in all, the proposals are well-integrated and respond positively to the properties along Conington Road and Lewisham Road; the River Ravensbourne; the town centre; the Silk Mills Path Area of Special Local Character and properties to the north. This is achieved through the proposed massing and the through numerous public realm improvements.

- *DG3 - Development should ensure buildings are set back sufficiently to be able to provide high quality urban spaces with generous, functional, and formal landscaped areas forming the central part of an improved Silk Mills Path and the river corridor. Dissecting Silk Mills Path should be access from Lewisham Road and Conington Road, linking to the river and Lewisham interchange.*

3.74 We propose that DG3 gives greater consideration to the re-provision of the Tesco supermarket, which will be located at podium level. The scale and massing of this element has been designed to be sufficiently set back to enable the provision of a high-quality public realm. The proposed character areas seek to provide an identity and function to a collection of high-quality urban spaces positioned to amplify Eagle House and the river walk along the renaturalised river. New routes are proposed, providing pedestrian access between Lewisham and Conington Road, as well as between Silk Mills Path and Lewisham Station via the existing access points as well as the new access across the Meyer Homes Site.

- *DG4 - Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.*
- *DG5 - Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the trunk sewer running south to north through the site will not be allowed.*

3.75 We welcome the requirement to work in partnership with the Environment Agency and Thames Water. Astir seek to engage in separate pre-application discussions to identify ways in which to mitigate against flood risk along the River Ravensbourne and to manage the impacts on ground water, surface water and ensure adequate infrastructure is provided to facilitate this.

- *DG6 - Development should respond positively in scale, bulk, and massing to the River Ravensbourne, taking advantage of the natural slope of the site. The river embankment should be visually and physically accessible from Conington Road and improve access to Lewisham transport interchange, Lewisham Gateway, and the wider town centre environment.*

3.76 We support the requirement to positively respond to the River Ravensbourne. The proposed scale, bulk and massing has been carefully considered in relation to the river, as per the most recent pre-application submission. However, we propose that DG6 recognises the need to re-provide a large-format Tesco store adjacent to the river which requires a certain amount of development and mass. This area will benefit from comprehensive naturalisation and public realm improvements. The river will be accessible via the Town Centre, Lewisham Transport Interchange and Conington Road, via the north-south route in Silk Mills Path and an east-west route from Silk Mills Path to Eagle House.

- *DG7 - Development should respond positively to the scale and grain of the existing historic fabric towards the southern end of the site, at Silk Mills Path and Lewisham Road.*

3.77 We welcome the need to respond positively to the southern area of the Site at Silk Mills Path and Lewisham Road. Careful consideration has been given to the historic fabric towards the south of the site. Here the massing and scale of the development is proposed to step down sensitively, and the existing route along Silk Mills Path is enhanced.

- *DG8 - Development should respond positively to Eagle House, which sits on the site's eastern edge fronting Lewisham Road. This building was constructed in approximately 1870 and is one of the original Anchor Brewery Buildings. It is of architectural and local significance.*

3.78 We acknowledge the local heritage and architectural significance of Eagle House. Recognising this, we seek to celebrate its local significance by transforming this building into a modern flexible working and community use to act as a beacon drawing people into the site. Located at the south-eastern corner of the Site, Eagle House will present itself as a local landmark.

- *DG9 - Development should allow for the retention and/ or re-provision of the bus stop and stand facility that are currently provided on this site.*

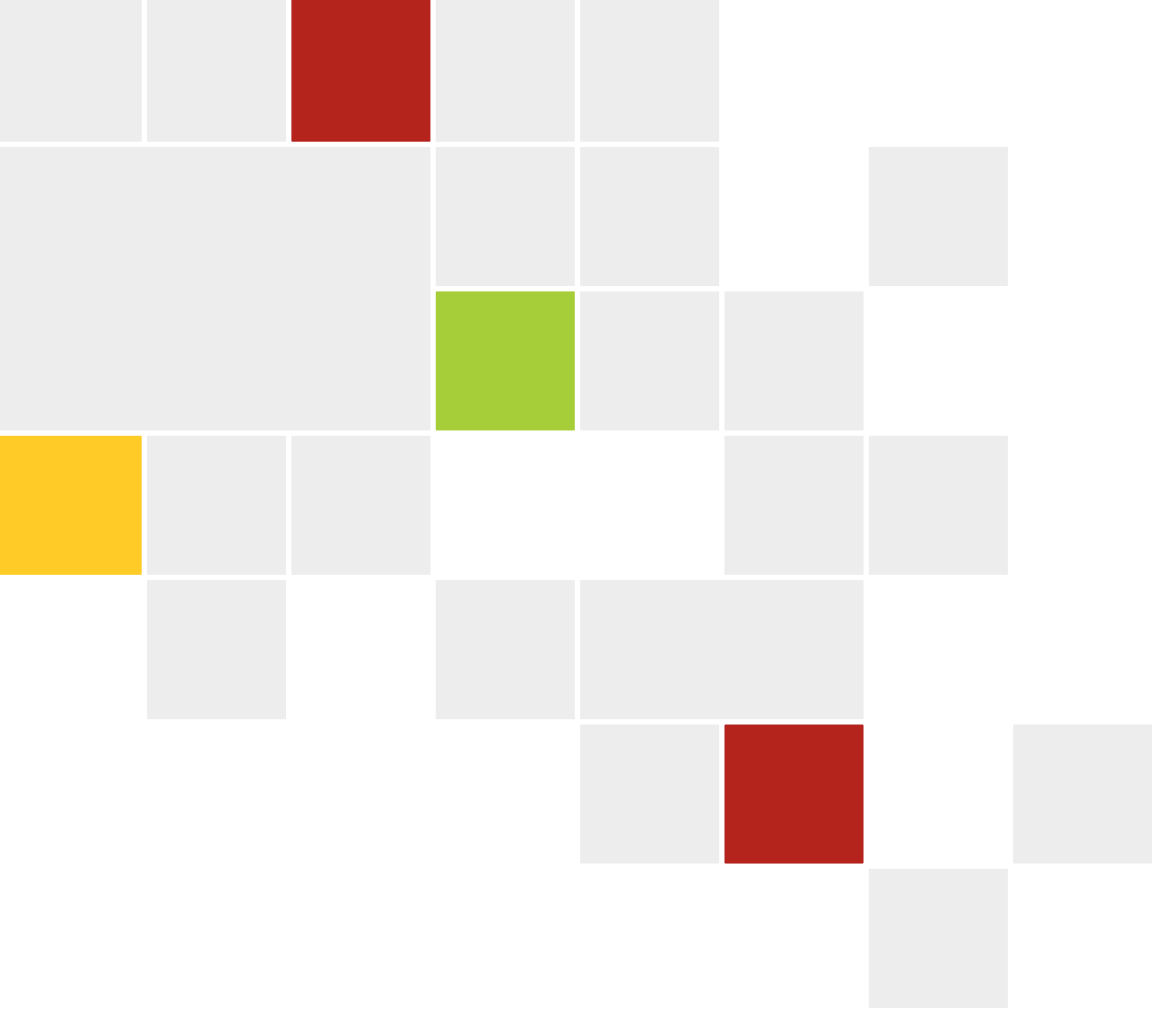
3.79 We object to the retention of a bus stop on-site, as this would materially impact the Site's ability to deliver the public benefits put forward as part of future proposals. These benefits include but are not limited to the provision of housing, flexible retail and commercial floorspace, leisure uses, care accommodation, PBSA, as well as improvements to the public realm and river.



3.80 The existing bus route (273) only serves one route and is an extension of the original route from Petts Wood to Lewisham Station. The bus stops on site then immediately returns back to Lewisham Station. Therefore, whilst the bus route provides a trading benefit to Tesco, the benefit to the wider community is limited. It should be noted that there are multiple bus services available on Lewisham Road, along the eastern boundary and Station Road, south of Silk Mills Path. These bus stops serve a total of seven bus routes, including the 47, 129, 199, 225, 380, N89 and N199.

## 4. SUMMARY AND CONCLUSIONS

- 4.1 As discussed, we wholly support the Council's aspiration to support the comprehensive redevelopment of Site Allocation 5 (SA5) under the Draft Local Plan, to deliver a mix of residential, main town centre and commercial uses.
- 4.2 Astir seek to satisfy and go beyond the aims of SA5, with the aim of optimising the Site to ensure the best use is made this key town centre location. This involves a comprehensive mixed use redevelopment of the Site, to provide a replacement Tesco store, alongside a range of residential uses including build-to-rent (BtR) units, a care home and aparthotel, PBSA, as well as additional flexible commercial floorspace and new public realm.
- 4.3 We trust that our above comments are of assistance and that LBL will give due consideration to the recommendations we have made.
- 4.4 If you have any questions concerning the above, please do not hesitate to contact us will be happy to help. Otherwise, we trust our comments will be given due consideration and we reserve the right to make further representations with additional evidence in due course.



# Boyer

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**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

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First Name	Travis	Line 2	Great Portland Street
Last Name	Crawford	Line 3	First Floor
Job Title	Director	Line 4	
Organisation	Astir Living Limited	Post code	W1W 7LT
Telephone number	C/O Agent - 07546406180	E-mail Address	C/O Agent - arjunlal@boyerplanning.co.uk

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?

Chapter name

Transport and Connectivity

2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)

Policy name/number

TR4 - Parking

3. Do you consider that this part of the chapter is legally compliant?

Yes

No

4. Do you consider that this part of the chapter sound?

Yes

No

5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate?

Yes

No

6. Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.*

**Continue answer on separate sheet if necessary.**

See supporting statement - '230425 - Lewisham Local Plan Regulation 19 Representations - Astir Living Limited'.

**7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

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**8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

**9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.***

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2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)** Policy name/number
3. **Do you consider that this part of the chapter is legally compliant?** Yes  No
4. **Do you consider that this part of the chapter sound?** Yes  No
5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?** Yes  No
6. **Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

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Chapter name

Sustainable Design and Infrastructure

2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)**

Policy name/number

SD1 - Responding to the Climate Emergency

3. **Do you consider that this part of the chapter is legally compliant?**

Yes

No

4. **Do you consider that this part of the chapter sound?**

Yes

No

5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?**

Yes

No

6. **Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

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Chapter name

High Quality Design

2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)**

Policy name/number

QD6 - Optimising Site Capacity

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Yes

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No

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EC21 - Visitor Accommodation

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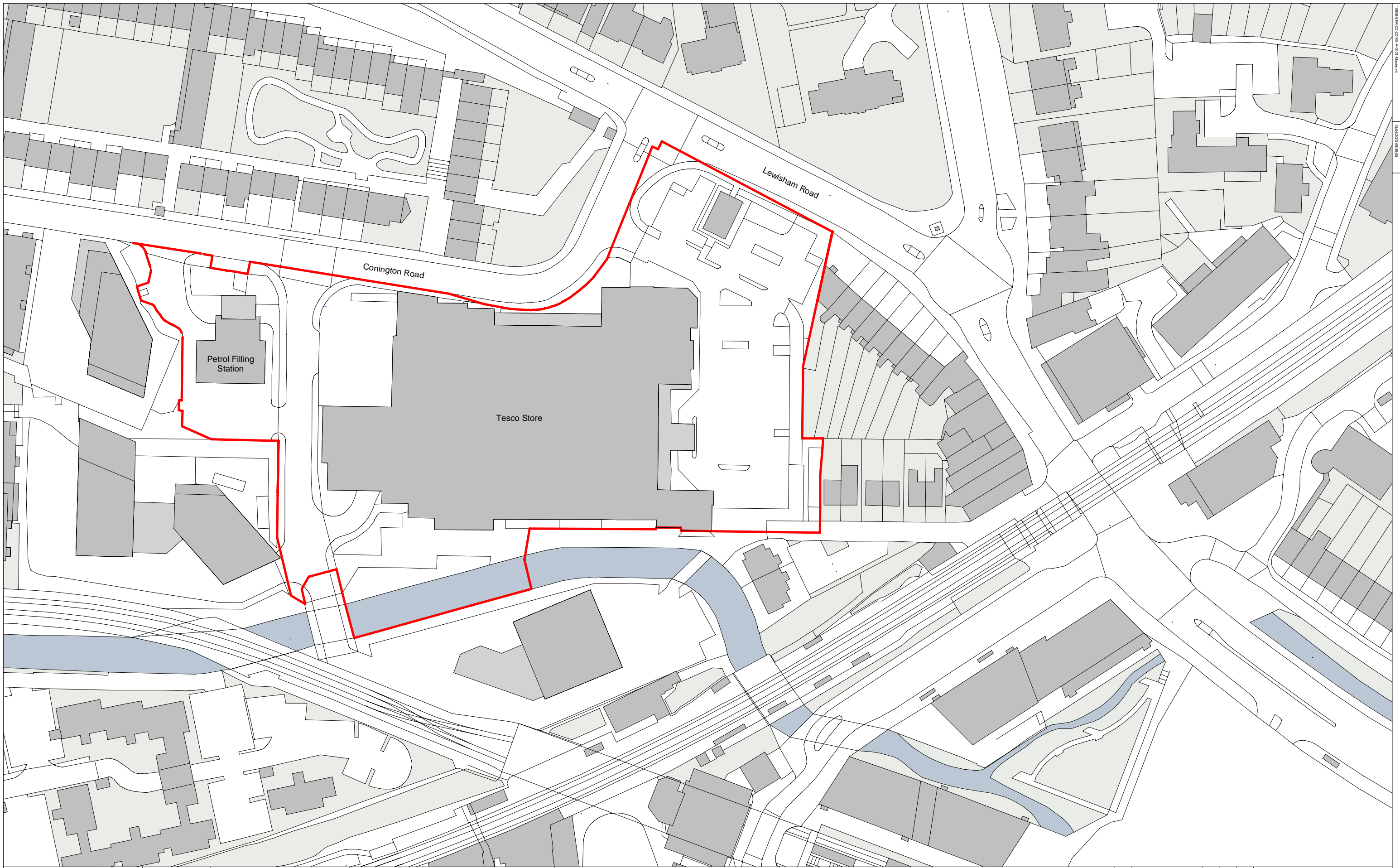
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Keyplan

Scale bar

5 0 5 10 15 20 25  
m

SCALE 1:500

Notes:  
Do not scale off this drawing for any purposes other than those required in connection with the application for planning consent for the project. All dimensions to be verified on site.  
This drawing is prepared for the sole use of EPR Architects' employer and the benefit of the employer's permitted licensees. No liability to any other persons is accepted by EPR Architects.  
EPR Architects has prepared this drawing based on site information provided by a third party and which is included for reference purposes only. This site information is indicative and has not been checked or verified by EPR Architects and EPR Architects accepts no liability for it. This information includes the Site Boundary, PRS compound, OSMAP, ZMap, Landscape design by Andy Sturgeon Design, Gas Easements and the Gasholder structure.

Sheet notes:

1. All site boundaries and legal demises are indicative and shown for information only, based on desktop studies of land registry and record information, and are subject to survey and verification site.

KEY:

— Planning application boundary

No.	Revision	Date	Initial	Chk'd
P01	Issued for information	12.04.23	BPS	MA

**EPR ARCHITECTS**  
+44 20 7932 7600  
www.epr.co.uk

Conington Road - Tesco Masterplan  
Project Address

Existing Site Plan

Scale	Purpose of Issue	Status code	Revision
As indicated	For Information	S2	P01

Project Code: 10638 - EPR - ZZ - XX - DR - A - 01-0001

Our Ref: 02B702560

22<sup>nd</sup> March 2023

Planning Policy Team  
London Borough of Lewisham  
4<sup>th</sup> Floor, Laurence House, Catford  
London  
SE6 4RU

Dear Sir/Madam

**Representation to Lewisham Local Plan Regulation 19 Stage “Lewisham Local Plan: Proposed Submission Document” (Dated January 2023) – Lewisham Retail Park, Loampit Vale**

We write on behalf of our client, Legal & General (L&G), to submit a representation to the London Borough of Lewisham (LBL) in response to the Lewisham Local Plan: Proposed Submission Document (dated January 2023). The consultation period for this document closes on Tuesday 25<sup>th</sup> April 2023.

This representation is made specifically in relation to the draft Site Allocation 7: Lewisham Retail Park, Loampit Vale (the Site).

These representations follow those made on behalf of L&G, on the Regulation 18 Stage of the Lewisham Local Plan, dated 9<sup>th</sup> April 2021 which set out the background and current policy context for the Site.

**Comments on the Local Plan: Proposed Submission Document**

We welcome the opportunity to comment on the draft Local Plan. Overall, L&G is supportive of the inclusion of the draft site allocation for Lewisham Retail Park, Loampit Vale (Site Allocation 7) and the principle of redevelopment for this site.

We note that the Proposed Policies Map (January 2023) identifies the Site as an appropriate location for a tall building. This aligns with the findings of the Council’s supporting evidence base document: “Tall Building Review Background Paper – January 2023” which identifies the Site (reference L9 in this Paper) to be included in a ‘tall building suitability zone’ and recommended to be grouped together with a cluster of adjoining sites of a maximum of 35 storeys clustered around Lewisham Station. An extract of the Table from the Paper detailing this is included in Figure 1.0 below:

					max. 35 storeys clustered around station
L8	Recently developed mixed use tower blocks bordered by rail on north and western sides and Jerrard St on east side.	Y	Recently developed	Completed scheme scale: up to 10 storeys	
L9	Lewisham Retail Park	N		Site allocation 7 (central area) Extant permission ref: DC/16/097629 Podium with series of towers up to 23 storeys and tall parapet concealing services	Group with adjoining sites – max. 35 storeys clustered around station
L10	Student Exchange towers, recently developed student housing with Bakerloo terminus for future BLE	Y	Recently developed	Completed scheme scale: up to 34 storeys	
L11	Lewisham Gateway	N		Site allocation 1 (central area)	Heart of metropolitan

Figure 1.0 – Table taken from page 12 of Tall Building Review Background Paper (January 2023)

The allocation of the Site as an appropriate location for a tall building is supported by L&G and aligns with the extant planning permission for the Site (ref: DC/16/097629) for buildings of up to 23 storeys in height.

However, the current ‘Planning Designations and Site Considerations’ section of Site Allocation 7: Lewisham Retail Park does not expressly state that this Site is identified as a suitable location for a tall building and currently reads as follows:

*Opportunity Area, Regeneration Node, Bakerloo Line Safeguarding Direction, Adjacent to Site of Importance for Nature Conservation, Adjacent to Strategic Open Space, Air Quality Management Area, Air Quality Focus Area, Major Centre, Night-time Economy Hub, Flood Zone 2, 3, Groundwater Source Protection Zone 1, Critical Drainage Area*

To accord with London Plan Policy D9 ‘Tall Buildings’ part B and for the Local Plan to be therefore, ‘sound’, we request that it is expressly stated in this part of Site Allocation 7: Lewisham Retail Park that the Site is identified as an “appropriate location for a tall building” in the same way that this is included in other site allocations such as Site Allocation 6: Thurston Road.

Further, the Site is not expressly listed in Schedule 12 of the Lewisham Local Plan: Proposed Submission Document (January 2023) which expressly lists Tall Building Suitability Zones. Again, to accord with London Plan Policy D9 part B and the Local Plan to be therefore found ‘sound’, we request that the Lewisham Retail Park site is expressly listed in this Schedule under the Lewisham group ‘Conington Road brownfield site, Land at Conington Road and Lewisham Road, Thurston Road Bus Station and Lewisham Gateway’ identified for buildings of up to 35 storeys in height. As above, this is in line with the findings of the Council’s evidence base document: Tall Building Review Background Paper – January 2023.



### **Next Steps**

We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read "S. Wardley".

**Sascha Wardley**  
**Associate Director**  
**07908673459**

[Sascha.Wardley@avisonyoung.com](mailto:Sascha.Wardley@avisonyoung.com)

**For and on behalf of Avison Young (UK) Limited**

Our Ref: 02B906298

24<sup>th</sup> April 2023

Planning Policy Team  
London Borough of Lewisham  
4<sup>th</sup> Floor, Laurence House  
1 Catford Road  
London  
SE6 4RU

Dear Sir/Madam,

**Representation to the London Borough of Lewisham's Consultation on the Draft Regulation 19 Local Plan (Dated January 2023)**

**Barratt London**

We write on behalf of Barratt London (BL) in representation to the London Borough of Lewisham's (LBL) current consultation on the Regulation 19 Draft Local Plan (January 2023). This document is of interest to BL given that their land interest concerning Catford Island, London, SE6 2DD (the Site). For clarity, the location of the Site is shown within **Appendix I** of this Representation.

We understand that LBL seeks to publish a new Local Plan which will set out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision to 2040. Once finalised the Local Plan will comprise an adopted document within Lewisham's statutory Development Plan and will replace the current Lewisham Core Strategy (2011), Site Allocations Local Plan (2013) and Development Management Local Plan (2014).

Overall, BL broadly supports the principle of the emerging Local Plan to help establish a future vision for Lewisham. However, we do make various comments below concerning how its policies (especially those relating to the Site) should be addressed within this document (to ensure that they meet the tests of 'soundness' set out within the National Planning Policy Framework (NPPF)).

**Context of Representation**

BL is in the process of preparing a planning application concerning the comprehensive redevelopment of the Site (prepared in consultation with the Borough's planning officers and further to consultation with local stakeholders and the community). As such, the Draft Local Plan will become an increasingly significant material consideration in planning decision-making for the Site in moving forward.

**Catford Island Site Allocation (Site Specific Policy)**

Within the Draft Local Plan the Site forms part of Draft Site Allocation 18 ('*Catford Island*'). The Site therefore comprises a significant brownfield redevelopment opportunity within Catford Town Centre and LBL more widely.

Overall, Barratt London strongly support the principle of mixed use, residential-led development at the Site given that it is an integral and important redevelopment opportunity within Catford

Town Centre which will ultimately be key to delivering sustainable and long-lasting regeneration benefits locally.

Development Capacity

The current Draft Site Allocation sets out an indicative development capacity of 602 residential units, 6,206sqm of employment and 6,206sqm main town centre uses for 'Catford Island'.

In response, we consider that the allocation should clearly set out that these figures are illustrative only. We also suggest that the following wording be added to the Draft Site Allocation:

***Final development capacity to be determined through a design-led approach to make the best use of land and optimise development in accordance with Local Plan Policy QD6 and London Plan Policy D3***

This approach will allow for the delivery of much needed new homes to be optimised beyond the illustrative development capacity thresholds if justified in planning, design and townscape terms.

In short, the Draft Site Allocation should allow for flexibility, to ensure that future development at the Site is ultimately deliverable on this suitable, available and achievable brownfield site.

Comprehensive Masterplanned Approach

We broadly support the aspiration for the Draft Site Allocation to be comprehensively masterplanned.

Given the multiple land ownerships within the allocation boundary, we consider that this can be suitably achieved through ensuring that 'neighbourly design principles' are incorporated into each respective part of the Site. We recommend that wording clarifying these matters be added within the allocation wording.

This approach will help to ensure that delivery of development on the part of the Draft Site Allocation (owned by BL) is not slowed down by a lack of progress on other parts of the Site. Development on each part of the Site should be designed to not prejudice development coming forward on adjacent land parcels within the allocation.

Development Guidelines

The Draft Site Allocation includes various 'Development Guidelines', including broad guidance concerning the location of 'tall buildings' within the allocation boundary.

We suggest that this wording be revised as follows (to ensure the appropriate level of flexibility to allow for the delivery of much needed homes to be optimised if possible):

*The design of development should respond positively to the residential properties to the site's east, having regard to existing townscape features. ~~Tall buildings should be located centrally on the site and not be located along the site's eastern boundary.~~ **There is scope to deliver a tall marker building centrally within the Site. Other parts of the Site may also be suitable for taller buildings, providing this approach is justified in planning, environmental and townscape terms.***

**Policy QD4 – Building Heights**

Tall Building Suitability Zones

Draft Policy QD4 sets out that tall buildings should only be developed in locations identified as appropriate for tall buildings within identified 'Tall Building Suitability Zones'.

The Tall Building Zones for Catford are set out in Figure 5.6 of the Local Plan (included as Figure 1 below):



**Figure 1: Excerpt from Draft Local Plan (showing Catford 'Tall Building Suitability Zones')**

Whilst the Catford Island site is included within a Tall Building Zone, this currently only identifies the potential for a maximum of 20-storeys to be delivered in the middle of the Site (and maximum of 6 storeys to be delivered around the outer perimeter). These current 'maximum building height thresholds' for Catford Island **are too restrictive** and would prevent the potential for this brownfield, town centre site to be sensitively redeveloped to optimise the delivery of much needed new homes.

In our view, it is essential that Policy QD4 (and Figure 5.6 within the Local Plan) be updated as follows):

- The policy should clearly set out that there is potential to deliver building heights beyond those identified within the Tall Building Suitability Zones, if justified in design, planning and townscape terms.
- Figure 5.6 within the Draft Local Plan should be updated to align with this approach – a note should be included alongside the image setting out that **'there may be potential to deliver taller buildings than those identified within the Tall Building Suitability Zone if justified in planning, design and townscape terms'**.

We note that Part C of Draft Policy QD4 does currently identify some scope for flexibility concerning the maximum building heights identified within Tall Building Suitability Zones (i.e. the policy currently states that the heights of buildings within these zones should 'not normally be more than' the identified heights). However, the Draft Local Plan **should go further to allow for taller elements to be delivered in these locations** (if justified through a comprehensive design process).

We therefore consider it **essential that Policy QD4 is updated** to include the following wording:

***The maximum building heights identified for Tall Building Suitability Zones within the Local Plan are illustrative. There may be scope to deliver taller elements in these locations if justified in planning, design and townscape terms (and if delivered as part of a comprehensive design process).***

At Appendix II, and in support of this representation, we also include a Technical Note prepared by BL's townscape consultant (Montagu Evans) previously, in response to the Borough's recent Tall Building Study Addendum consultation.

This Note outlines the following position from a townscape perspective:

- The rationale for 20 storeys being the maximum threshold is not based upon a detailed analysis of individual site constraints and opportunities and does not allow for the potential ability for other sites to accommodate a higher degree of change.
- The guidance set out in the Addendum document seeks to inform how the emerging Development Plan is to be delivered. However, the maximum heights set out in the Addendum are not "sound" as defined by paragraph 35 of the NPPF (given that these are not justified through proportionate evidence).
- Views analysis has been undertaken concerning the Site (and is detailed within Montagu Evans' Note). This views analysis demonstrates that:
  - A tall element of more than 20 storeys, delivered within the centre of the Site, would achieve a necessary vertical emphasis and would result in a slender building with an elegant appearance. This would also help realise the opportunity to recreate 'legibility of townscape' (which has been lost) within Catford Town Centre and would aid local wayfinding from the area's 2no. train station to the town centre.
  - A tall marker building of exemplary design at heart of the Site would allow for a more dynamic skyline and townscape composition to be created. This would arguably reduce visual impacts on adjoining residential areas.
  - Allowing the principle of a building above 20-storeys at the Site (subject to other relevant design, planning and heritage considerations) would allow for a clearer distinction to be delivered between a central tower element and a 'mediating layer of buildings around the site perimeter',

The Technical Note also includes wireline images (showing a scheme of varying building heights across the Site between 5 and 23 storeys) within key views. In short, it is clear that there is scope to deliver a range of building heights on-site (beyond the maximum height thresholds currently identified within Policy QD4) from a townscape perspective. This further supports our position that Policy QD4 should be updated to allow for greater flexibility concerning maximum building heights at the Site.

We also highlight that the 6-storey 'maximum building height' threshold identified concerning the perimeter of the Catford Island Tall Building Suitability Zone does not appear to be supported by specific evidence, nor justified within, the Borough's Tall Building Study Addendum (a key evidence base document for LBL's emerging Local Plan). As such, this aspect does not appear to be



underpinned by robust evidence, and therefore this approach is not considered to be 'sound' (as per NPPF requirements). We therefore strongly suggest that the above comments be incorporated.

**Policy EC11 – Town centres at the heart of our communities**

BL broadly supports this draft Policy which focuses on future growth and investment within and around town centres, particularly to optimise the use of land. The delivery of an appropriate mix and balance of residential and main town centre uses within town centres is also strongly supported.

**Policy SD2 – Sustainable design and retrofitting**

We broadly support the Council's objectives to consider sustainable design principles early in the planning and design stages for proposed developments.

Part C of the draft Policy requires new non-residential development of 500 sqm or more, to achieve a BREEAM 'Excellent' rating.

At present this wording does not acknowledge there may be site specific technical factors that mean an 'Excellent' rating cannot be achieved. We therefore request the policy be amended to clarify that this rating is a '**target**' rather than a fixed policy requirement.

We hope that the above points are clear/helpful.

As set out above, we overall broadly support the key aspirations of LBL's Draft Local Plan (subject to the above comments being considered and addressed). We consider that LBL should consider and incorporate the above comments as a means of ensuring that the Local Plan, and its policies, are '**sound**' (as per NPPF requirements).

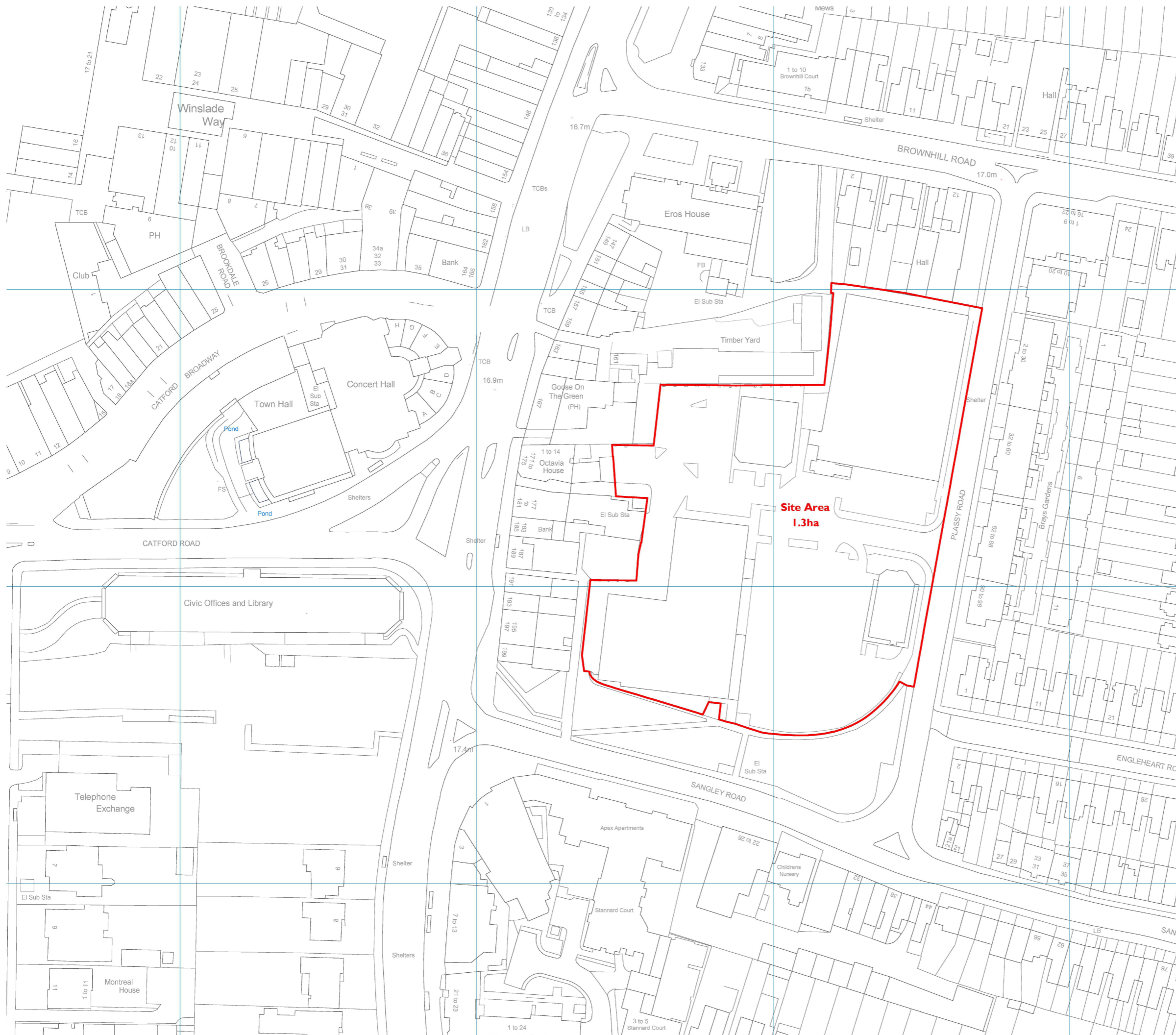
Should you have any queries and/or wish to discuss the contents of this Representation, please do not hesitate to contact either Colin Sinclair or Isobel Paterson at the above Avison Young office.

Yours faithfully



**Colin Sinclair**  
**Associate Director**  
**Colin.Sinclair@avisonyoung.com**  
**For and on behalf of Avison Young (UK) Limited**

## **Appendix I – Location Plan**




**NOTE**

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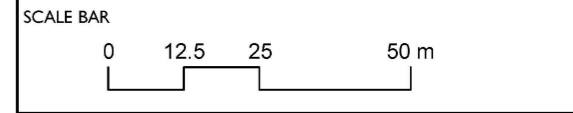
Date	Status	Rev	Description
17.02.2023	A3	C01	Planning Drawings

NORTH



KEY PLAN





**MAKOWER ARCHITECTS**



CLIENT

**BARRATT — LONDON —**

PROJECT No.	PROJECT
<b>106</b>	<b>CIS - Plassy Island, Catford</b>

DRAWING NUMBER

**CIS-MAK-MP-XX-DR-A-80-1000**

TITLE

**Site Location Plan**

DRAWN BY	CHECKED BY	DATE
<b>Author</b>	<b>AA</b>	<b>17.02.2023</b>

SCALE @ A3	STATUS	REV
<b>1 : 1250</b>	<b>A3</b>	<b>C01</b>

## **Appendix II – Technical Note, Montagu Evans**

# THIS IS A NOTE



## TO

London Borough of Lewisham

## CC

-

## FROM

Montagu Evans LLP

## DATE

8 June 2022

## SUBJECT

Comments on Lewisham Tall Buildings Study Addendum from a heritage, townscape and visual impact perspective

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Montagu Evans have been instructed by Barratt London to provide consultancy services and prepare this response on heritage, townscape and visual impact matters to the Lewisham Tall Buildings Study Addendum. Lewisham Council has asked for comment by 10 June 2022.

Barratt London supports the Council's ambition for growth and renewal across the borough and within Catford, which is identified as a major Town Centre and the administrative heart of the Borough. We welcome the analysis undertaken by the Council's consultants, following the adoption of the new London Plan in March 2021, and support many of the findings in the draft document.

### CATFORD ISLAND

Montagu Evans, alongside other practices, are advising Barratt London on the redevelopment of the site at 1 at Plassy Road ('Catford Island'). The design for Catford Island is being developed by Makeover Architects and Studio Egret West.

The Catford Town Centre Framework, published by Lewisham Council in June 2021, identifies the Site as a key regeneration site. It falls within the New Cross, Lewisham and Catford Opportunity Area.

### GENERAL COMMENTS

#### COMPLIANCE WITH LONDON PLAN POLICY GG2

The London Plan provides overarching targets for the future development of the capital and describes how the capital will sustainably growth and develop in the future.

The Council's approach to define heights precisely is not consistent with general policy principles in the London Plan.

Policy GG2, entitled "*Making the best use of land*", provides an ideal framework with which to draw together the various questions raised by the draft SPD. Limbs C and D require schemes to explore "the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling" (Limb C), while "*applying a design-led approach to determine the optimum development capacity of sites*".

Thus, the correct approach to achieving an optimised design is to look at the particular circumstances at each site and in detail with reference to several variables, and not just visual and heritage impacts.

#### COMPLIANCE WITH LONDON PLAN POLICY D3

The role of design in land use optimisation is expressly treated at D3. This restates the established sustainability principle of making best use of land, but adds that this should be done through a consideration of options "*to determine the most appropriate form of development*". The owners of Catford Island are pursuing that approach in developing a range of options which have been presented to the Council's Design Review Panel.

D3 also encourages the expansion of areas which already feature higher density developments, and enjoins LPAs positively to encourage that approach even to the point of expanding opportunity area boundaries.

Part A of D3 contains the general requirement that a *"design-led approach requires consideration of options to determine the most appropriate form of development that responds to a site's context and capacity for growth"*.

We understand from the drafting that it is the context's capacity for growth, which is being referred to, not a site's, which would not make sense. Thus, and importantly, existing height and scale datum points in a growth area should not be used to set new ones; instead, a design led approach to optimisation should look to the direction of travel in an area, taking into account its capacity for change.

The other limbs of D3 comprise more familiar contextual and amenity related policies which are those to be considered in the pursuit of optimisation through an options process.

### **COMPLIANCE WITH LONDON PLAN POLICY D9**

The addendum provides locational directions and allows a degree of flexibility, which is, we think, the correct approach for any such document to take. We understand that the document seeks to respond to Part B of London Plan Policy D9, which requires local planning authorities to allocate sites with specific height maxima in mind (given that the Tall Building Addendum, once adopted, will form a key evidence base document for the emerging Local Plan).

We consider that any tall buildings policy purporting to allocate height must allow flexibility to respond to the particular circumstances of a site, which is explored through the process of design-led optimisation, London Plan Policy D3.

No study prepared by a local planning authority can realistically anticipate the range of circumstances which must be taken into account in order to achieve optimisation. These circumstances obviously include visual and heritage impacts. Other relevant circumstances that go to establishing optimisation include but are not limited to:

- Abnormal site costs;
- Existing use values; and
- Achieving other planning objectives, for example, around affordable housing or workspace or community uses; and
- Deliverability overall

Based on these 'uncertainties', it is considered that height guidance can only be indicative and detailed design development, taking into account all considerations (see above), is necessary to identify acceptable heights for any one site. Therefore, all guidance needs to be taken reasonably and flexibly to allow for the facts of any site. We conclude, with reference just to our topic area, that any such document not containing that necessary flexibility must be given very limited weight.

Figure 1: Illustrative Wireline Views



## CATFORD TALL BUILDING ZONE

In the Addendum, Catford is identified as one of the eight neighbourhood-based areas in the borough *“that are likely to play an important role in Lewisham’s ongoing growth and regeneration strategy whilst also demonstrating a level of potential suitability for taller buildings”*. The study confirms that Catford town centre *“is one of the most suitable locations in the borough for taller buildings”*. The Catford town centre area comprises two zones with opportunities for tall buildings. Zone A is the actual town centre at the junction of Rushey Green and the Broadway, Zone B is an area along the Bromley Road Ravensbourne Retail Park. The addendum suggests building heights of up to 20 storeys (64.8 m) in Zone A which is identified for *“significant regeneration opportunities”*. The term ‘tall building’ is defined as being buildings of 12-storeys or 39.2m tall within Zone A.

The vision for Catford Island is the sustainable and mixed-use transformation of the Site and town centre to re-integrate the place within its surrounding urban fabric, integrating the new into the existing context, particularly the historic street frontage of Rushey Green and the Culverley Green Conservation Area, to create a layered living neighbourhood in combination with vibrant and high performing town centre activities. Healthy living, retail and flexible working will come together around diverse and inclusive public open space at the heart of the Site. Existing connecting opportunities to the Broadway and beyond will enable the Site to be permeable and link to the neighbourhoods to the east.

## SUMMARY OF OUR TOWNSCAPE ANALYSIS

Our analysis of Catford’s townscape and heritage highlights the ability of the Site to accommodate change, given the natural physical and visual buffer of the buildings on Rushey Green, and the emerging tall and coarse grain development located to the north and west of the Site. Catford Island occupies a key site within the fabric of Catford and demarcates the town centre. The views on the previous page (Figure 1) demonstrate that a tall element of more than 20 storeys at the centre of the site is required to achieve the necessary vertical emphasis and a slender building with an elegant appearance. The town centre is clearly understood in the wider context of the Borough, reinforcing the spatial hierarchy of the local and wider context and aiding legibility and wayfinding as required by London Plan Policy D9. This is particularly relevant for the views from Catford Bridge and along the north-south axis (Lewisham High Street/Rushey Green/Bromley Road). The legibility of the townscape at Catford Bridge has been lost. There is an opportunity to recreate this and aid wayfinding from the two train stations.

Furthermore, greater height at the heart of the site (Block D3) allows for a more dynamic skyline and townscape composition that will reduce visual impact on adjoining residential areas. The increased height of Block D height allows for a clearer distinction between the mediating layer of buildings around the site perimeter and the cluster of taller buildings at the heart of the site.

The views also highlight the benefits of redeveloping at greater height in terms of freeing up more space at ground floor that would create new areas of publicly accessible space and complementary to the surrounding townscape, particularly along Sangley Road. The comprehensive redevelopment of the site affords a significant opportunity to improve the visual amenity of this frontage and its contribution to the adjoining conservation area. Additional storeys do not negatively impact on the surrounding heritage assets and townscape.

## MAXIMUM HEIGHT

The design led optimisation of centrally located brownfield sites such as Catford Island, development economics, affordable housing and infrastructure requirements, retail and commercial needs, townscape, heritage assets and the role of Catford town centre need to be taken into account in a flexible way. In our view, buildings above 20-storeys could be supportable in townscape terms subject to relevant design and heritage considerations being duly considered and robustly addressed. Key townscape benefits, such as signposting this important site within regeneration area and town centre of Catford, the slender and elegant marker building that aids wayfinding through this part of the Borough can only be achieved by an above 20 storey building as shown on the images on the previous page.



In our view, the heights set out in the addendum are too restrictive to achieve an appropriate planning balance. The rationale for 20 storeys being the maximum threshold is not based upon a detailed analysis of individual site constraints and opportunities, and the potential ability for other sites to accommodate a higher degree of change. The guidance set out in the Addendum is to inform how the Development Plan is to be delivered; however, the maximum heights set out in the Addendum are not “sound” as defined by paragraph 35 of the NPPF e.g. they are not justified through proportionate evidence. We suggest an alternative wording which would make the addendum workable, basically confirming, that the heights are indicative, and detailed design, supported by technical assessments, are the only way to establish actual site capacities.

## **CONCLUSION**

We do not see the proposed heights are justified or evidenced and recommend the maximum height threshold of 20 storeys for Zone A should be removed and/or reviewed following the provision of a full evidence base. We recommend a further sentence is added stating “maximum heights for individual proposals will be subject to a detailed assessment against the criteria contained at policy QD4 of the Lewisham Local Plan and policy D9 of the London Plan”

The principle of indicative maximum height threshold is supported subject to it being treated as guidance, ensuring sufficient flexibility around these heights and providing a further sentence is added that allows for final heights to be determined through a detailed assessment of individual planning proposals against the criteria contained at policy QD4 of the Lewisham Local Plan and policy D9 of the London Plan.

**London Borough of  
Lewisham Draft Local  
Plan: Regulation 19  
Consultation**

**Representation by  
St Dunstan's  
Educational Foundation**

**April 2023**

**STY PLANNING.**

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## 1. Introduction

- 1.1. 4TY Planning Ltd has prepared this representation to the London Borough of Lewisham's ("the Council") Draft Local Plan Regulation 19 Consultation on behalf of St Dunstan's Educational Foundation ("the College").
- 1.2. The College's Representation focuses on the Draft Local Plan's impact on its sports facility at the Jubilee Sports Ground, Canadian Avenue, Catford ("the site"), particularly in respect of emerging plans for the re-routing of the South Circular (A205) and the removal of part of the site from the Metropolitan Open Land ("MOL"), which will facilitate the redevelopment and regeneration of Catford town centre.
- 1.3. Proposals for the re-routing of the South Circular were not included in the Regulation 18 Consultation, but we understand have been included in response to a representation submitted by Transport for London ("TfL"). The College did not make representations to the Regulation 18 Consultation.
- 1.4. This Representation provides an introduction to the College, its history, vision, values and role in the local community. It then moves on to describe the Jubilee Sports Ground, how it is used and the College's emerging plans for the enhancement of its asset.
- 1.5. Following this, the Representation reviews relevant draft policies in relation to housing development and sites designated Metropolitan Open Land, followed by a review of the emerging proposals for Catford town centre and the South Circular. Finally, the Representation explains the College's proposals for the Jubilee Sports Ground with these also being introduced on the drawings submitted with this Representation.
- 1.6. The College is keen to make clear from the outset that it is supportive of the Council's overall vision and proposals for the regeneration of Catford town centre. However, it is the College's position that the proposals as currently indicated, will result in the Jubilee Sports Ground and the former groundsman's house towards the site's NW corner being blighted. However, these impacts can be resolved through the modification of the draft Local Plan.

## 2. Introduction to St Dunstan's College

- 2.1. This section of the Representation introduces the College, its history, vision, values and role in the local community.
- 2.2. The College moved to its current site in 1888, having previously been located in the City of London, close to Tower Hill. The College provides an outstanding education to its students, proving itself to be at the forefront of educational thinking and having recently won a spate of awards and accolades, including Independent Senior School of the Year (2022), Coeducational School of the Year (2019) and, this year alone, awards for Independent School of the Year at the International Elite 100 Global Awards and Most Progressive Independent School in London. One of the reasons for this level of recognition is the substantial role the College plays within its local community, working closely with local partners in order to provide life-enhancing opportunities for residents and community groups.
- 2.3. The College purchased the Jubilee Sports Ground in 2012 given that pitch capacity within the main school site was inadequate to meet its educational and operational needs. Since that time, the ground has become an essential hub for the College's wide-reaching programme of community engagement, as well as supporting sporting excellence within a pioneering gender-neutral sports programme.
- 2.4. Additionally, the College allows external bodies and clubs to make use of the all weather pitches and grass pitches throughout the year, giving the local community access to high quality sports facilities.
- 2.5. The aerial image below shows the location of the Jubilee Sports Ground (outlined in red) relative to the main College site (identified by the star). The site lies directly opposite Catford Bridge station with Catford station immediately to the west. Catford town centre lies immediately to the north and north east of the site.



- 2.6. St Dunstan's College is a registered charity (Charity Number 312747). It provides education for students between the ages of 3 and 18 years old, providing bursaries and scholarships to a wide range of pupils and opens its facilities to the wider community.
- 2.7. The College has a very well established community outreach and partnerships programme. The College's community is formed of three main parts; the residents of Catford and Lewisham, the pupils and their families (including alumni); and the wider organisations across London and internationally with whom the College shares spaces and ideas.
- 2.8. The College believes in a broader educational purpose that supports the ongoing aspirations for the betterment of Lewisham and its residents and it knows that such work aligns with the educational aims for its pupils. Through its work with local partners, the College provides life-enhancing opportunities to local people that seek to promote social mobility, engender wellbeing and improve communities in addition to responding with benevolence and charity to local needs and events.
- 2.9. The College recognises its privilege as an independent school but strives to ensure that its facilities can be of benefit to the communities which extend beyond the school gates.
- 2.10. Each year the College publishes on its [website](#) a brochure to summarise the various strands of its community outreach and support. Across the academic year 2021-2022, the College achieved the following:
  - **Supporting children and local schools:**
    - Bursaries totalling £792,000 were provided through the College's bursary programme.
    - Local schools were also supported through students being welcomed for regular masterclasses and performances; schools being given access to the College's pool and allowing free use of the Great Hall and Theatre.
    - With Lewisham Council and Westside Young Leaders Academy, the College established the Lewisham Young Leaders Academy, providing additional support to young people from across the Borough through transformative teaching in life skills, including leadership, teamwork, presentation skills and CV building. More than 60 students from across the Borough attend the Academy each week.
  - **Sport:**
    - The College gives 5 hours of free pitch hire at the Jubilee Sports Ground to Catford and Lewisham police units for training and fitness.
    - The College gave Lewisham's London Youth Games football squad free access to the all weather pitches ahead of major events.
    - Lewisham's School Games were hosted at the Jubilee Sports Ground with multiple schools participating.
    - The College supported the MCC Community Cricket Hub, providing local children with 13 weeks of free cricket coaching and pathways.
    - Over 10,000 swimming lessons were delivered to local children through the St Dunstan's Swim School.

- **St Dunstan's Festival:**
  - The 2021 Festival hosted more than 160 events across 11 days, including performances, exhibitions, workshops, lectures and competitions.
  - 10 local schools took part in a variety of community events, including an open air concert, an international evening celebrating all cultures and races and a community sings event which brought together local choirs.
  - Free open air cinema with 600 tickets made available to the local community.
- **Community Service and Charity:**
  - Students raised money for new trees to be planted in Catford.
  - The Lewisham Historical Society was given free use of the College's facilities.
  - The "St Dunstan's Sleep Out" raised £5,000 for Centrepoint.
  - Over 1,000 books were collected and donated to charity, providing books for disadvantaged local families.
  - Over £4,000 was raised for DEC's Ukraine Appeal.

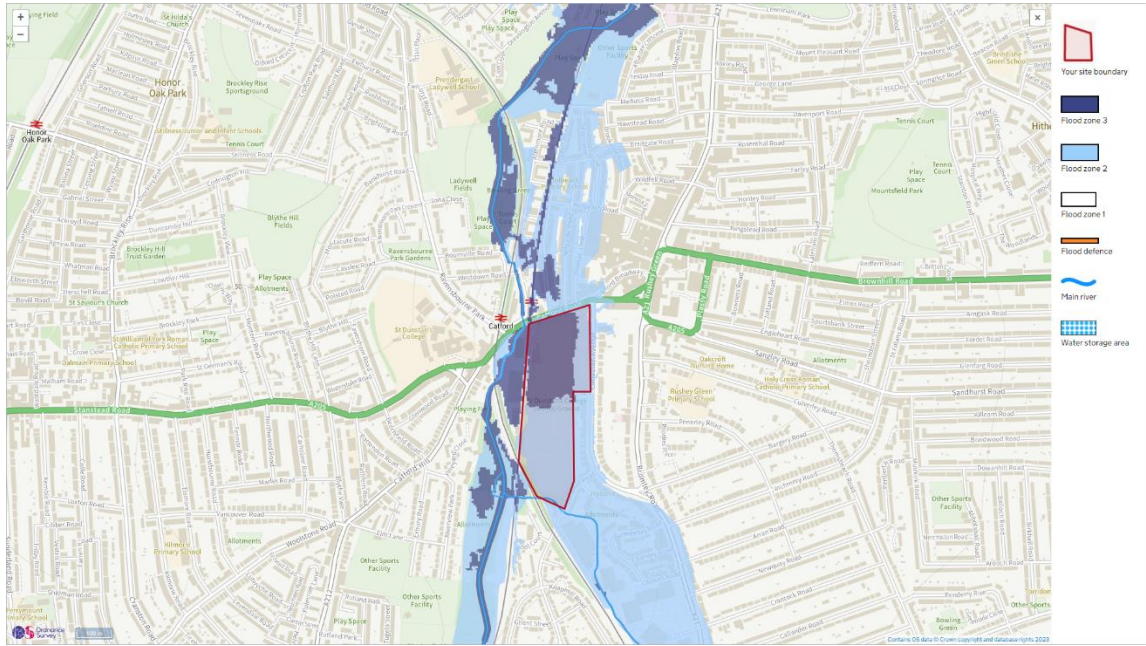
### 3. The Jubilee Sports Ground

- 3.1. This section introduces the site, summarises how the College uses the facility and explains its vision for the future development and enhancement of the site as an asset both for students at the College and the wider community.
- 3.2. The site was previously a private sports ground, owned by RBS Bank. The College purchased the site in 2012 due to a lack of adequate capacity on the main College site to meet operational needs. Since purchasing the site, the College has invested heavily in the enhancement of facilities at the site, delivering the all weather pitches towards the south, which has facilitated the site hosting a wider range of sports than previously was possible.
- 3.3. The site is enclosed on all sides by tall security fencing. Thus although it adjoins the town centre, it is physically and functionally separate from it.
- 3.4. Towards the west of the site is the pavilion, which appears to have been built in the 1960s and then extended over time. The building is in a poor state of repair and of an inefficient design and construction. It provides only a single set of changing facilities, heavily limiting the College's ability to allow wider community access onto the site on weekdays during termtime given safeguarding and security concerns.
- 3.5. The pavilion contains a main function room and smaller studio spaces, all of which are outdated and in need of modernisation so they can be made available for wider community use.
- 3.6. The grass pitches to the north of the site, across which the pavilion faces, provide the first team cricket square, which sits inside the painted athletics track, which is primarily used by the College to host its annual sports day. Over the winter months, the northern field is used for football.
- 3.7. Towards the middle of the site are the all weather pitches which the College has developed. Further to the south is a former grass pitch, which was infrequently used and which the College allowed Network Rail to accommodate for a 2 year period to undertake bridge replacement works on the line between Catford and Bellingham. The condition of that area deteriorated significantly during its use by Network Rail and as such now requires significant investment before it can be used for sport.
- 3.8. Back up at the NW corner of the site is the former groundsman's house, which stands close to the raised section of the South Circular with the public pedestrian access ramp linking through the subway to Catford Bridge extending across its front elevation. The house is now privately tenanted.
- 3.9. Immediately to the west of the house and separating it from the adjoining railway line is a parcel of overgrown scrub land, which is also within the College's ownership, but which is inaccessible.
- 3.10. With the exception of the all weather pitches, the sports facilities at the Jubilee Sports Ground are inefficiently arranged and there are large areas of land which are surplus to requirements and achieve little other than imposing a maintenance burden on the College. Moreover, in its current position, the pavilion has the effect of limiting capacity to the western side of the site and the College has been giving some initial thought to its replacement, relocation and enhancement.
- 3.11. The image below comprises an extract from the existing adopted Policies Map.





- 3.12. The site (excluding the overgrown scrub land to the west of the groundsman's house) is currently designated Metropolitan Open Land (green shading), Urban Open Space (green hatching) and forms part of the Culverley Green Conservation Area (land inside the red line). The orange hatching running across the northern part of the site indicates the location of planned road improvement works, but there is no policy in the Core Strategy which seeks to deliver these works.
- 3.13. Below is an extract from the Environment Agency's Flood Map. This shows that the site is principally within Flood Zones 2 and 3 at the level of the playing fields. However, where the South Circular rises to cross the railway, land is in Flood Zone 1. The groundsman's house to the NW corner of the site is in Flood Zone 3.



3.14. There are no statutory listed buildings within, or adjacent to the site.

## 4. The Draft Local Plan

- 4.1. This section identifies the draft policies of greatest relevance to the Jubilee Sports Ground site and the College's proposals, which are further explained below.
- 4.2. At pg.33, paragraphs 2.6 – 2.8, the Draft Plan addresses the deprivation and inequality in Lewisham. It is explained that the Borough is in the top 20% most deprived authority areas in the country and the seventh most deprived Borough in London with child poverty being a significant issue with some of the highest levels in the country.
- 4.3. At paragraph 2.8, the Draft Plan explains that more than 50% of the Borough's adult population is either overweight, or obese with roughly 16% of adults being physically inactive. The issue of childhood obesity is also explained with 22% of reception aged children being overweight, rising to 38% in year 6. Children in the Borough's most deprived areas are twice as likely to be obese or overweight as other children.
- 4.4. Linked with these paragraphs is Figure 2.3, which shows levels of deprivation in Lewisham. It is highly relevant in the context of this Representation that the area around the Jubilee Sports Ground is in the top 10% most deprived parts of the Borough. The parts of the Borough immediately beyond this area are in the 20% to 30% most deprived parts of the Borough.
- 4.5. **Draft Policy QD4** deals with building heights. At Part A the policy explains that a tall building in the Borough is one which is *"substantially taller than their surroundings and cause a significant change to the skyline."* However, the policy then states *"Within Lewisham Tall Buildings are defines as buildings which are 10 storeys or 32.8m measured from the ground level to the top of the building"*. Part B of the policy then sets out *"Tall buildings should only be developed in locations identified as appropriate for tall buildings on the Policies Map (i.e. Tall Building Suitability Zones). Development proposals for tall buildings outside of these zones will be resisted."*
- 4.6. These parts of the draft policy are contradictory and if adopted in their current form would lead to uncertainty. If a proposed development was 33m tall, outside a Tall Building Suitability Zone but between sites containing 11+ storey buildings, the draft policy would set out to resist the proposal but fundamentally such height should be acceptable in townscape terms if a high quality design is proposed since the development would be neither substantially taller than its surroundings and would not cause a significant change to the skyline.
- 4.7. Such a specific set of restrictions in the policy would act counter to the NPPF's and London Plan's requirements (as well as that outlined at **Draft Policy QD6**) that the development potential of a site should be optimised through a design-led approach to deliver new homes, employment and good growth.
- 4.8. The College **objects** to Part A of the draft policy and requests that it is modified to remove reference to a tall building being one which is 10 storeys or 32.8m in height.
- 4.9. **Figure 5.6** of the draft Plan (pg.96) show the Catford Tall Building Suitability Zone. This shows the Jubilee Sports Ground being surrounded by site allocations where development heights of up to 20 storeys will be supported. The College **supports** such developments coming forward in the area, but would suggest that the northern section of the Jubilee Sports Ground site should also be included in the proposed Zone.

- 4.10. **Draft Policy HO1** sets out to meet the Borough's housing needs, explaining that the London Plan's 10 year target (including any changes which are made through the review of that document) will be exceeded. The College **supports** this objective.
- 4.11. Part C of the policy seeks to increase housing supply, explaining that a "*carefully managed*" uplift in delivery will be achieved by directing housing to areas including proposed Regeneration Nodes. Whilst the College supports the proposal to increase housing supply in Regeneration Nodes (where the site is located), it is unclear what is meant, or intended by "*carefully managed*". It is considered that these words should be deleted from the policy.
- 4.12. **Draft Policy CI3** relates to sports, recreation and play and sets out to ensure that developments help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play. Such developments are encouraged to maximise opportunities to provide new or improved community infrastructure and public realm enhancements to allow sport, recreation and play facilities to be reached safely and easily. Part C of the draft policy explains that where developments are located within areas deficient in play space, new housing development must provide demonstrable improvements in quantity and quality of play space.
- 4.13. **Figure 9.1** shows that the southern part of the Jubilee Sports Ground site is in an area deficient in play space.
- 4.14. In the light of the acknowledged issue in the Borough of child and adult obesity, the College **strongly supports** the Council's proposed policy to encourage development to deliver enhanced access to play space. However, in the light of the objectives of the London Plan (see below), the College would recommend that the policy's objectives are expanded to encourage enhanced access to sports facilities in order to facilitate improved opportunities for participation in sport.
- 4.15. **London Plan Policy S5** relates to sports and recreation facilities and challenges Boroughs to ensure there is sufficient supply of good quality sports and recreation facilities with needs to be identified through audit work carried out during the Local Plan process. Where developments impact on sports facilities, applicants are required to show that proposals increase or enhance facilities in accessible locations, maximising the multiple use of facilities by schools, sports providers and community groups.
- 4.16. **Draft Policy TR1** relates to sustainable transport and movement. Part C sets out that the land required for the construction and operation of the Borough's network of strategic and other transport infrastructure will be safeguarded, included the schemes listed in Table 12.1. That Table identifies a list of strategic transport schemes, including the re-routing of the A205 (South Circular) in Catford, which is identified as having a short timeframe for delivery.
- 4.17. The explanatory text at paragraph 12.3 (pg.406) explains that the schemes listed in Table 12.1 will play a key role in supporting the delivery of the Borough's spatial strategy.
- 4.18. As introduced above, the College **supports** the principle of the proposed re-routing of the South Circular and is engaging positively with the Council and TfL in respect of the necessary transfer of land ownership in order that the Council's vision can be delivered. However, it is imperative for the College that any proposal for the re-routing of the road guarantees safe pedestrian access from the main College site into the Jubilee Ground, including adequate crossing points with safe refuge and adequate entrance capacity to accommodate groups of students and allow them to leave the highway quickly and safely.

- 4.19. **Draft Site Allocation 19: Laurence House and Civic Centre** proposes to allocate the Council office and civic centre site for mixed use development, including 262 homes together with c.13,000sqm of employment space and c.6,000sqm of main town centre use floor space.
- 4.20. As noted at draft paragraph 14.109, this allocation is only deliverable as part of and following the re-routing of the South Circular across the Jubilee Sports Ground site.
- 4.21. As introduced above, the College **supports** this allocation and the Council's proposals to regenerate Catford town centre.
- 4.22. **Draft Site Allocation 20: South Circular** proposes to allocate the northern section of the Jubilee Sports Ground to facilitate the re-routing of the South Circular. This opportunity was only identified in 2022 and included in the Regulation 19 version of the Draft Plan.
- 4.23. Consistent with the position set out above in connection with Draft Policy TR1, the College **supports** plans to re-route the South Circular subject to adequate and safe access being provided into the Jubilee Sports Ground.
- 4.24. It is noted that the draft allocation proposes to remove all land within the red line area from the MOL, including the majority but not all of the groundsman's house, which is now privately tenanted. As has been noted elsewhere in this Representation, the College is concerned about the impact of the re-routed road on the quality of accommodation within this house, which is already blighted by the existing road alignment and location of the public ramp access to the subway. With part of the house seeming to remain within the MOL, the College will be left with a further blighted asset which will become very difficult to tenant. Moreover, the policy position will be such as to prevent the College from being able to resolve matters through the submission of an ad hoc planning application.
- 4.25. The Lewisham Local Plan Metropolitan Open Land Exceptional Circumstances Paper (February 2023) prepared by the LPA proposes the release of a parcel of MOL at Catford, part of which is land owned and controlled by the College, principally for the purpose of accommodating the realignment of the South Circular (A205) which will enable the "comprehensive regeneration of Catford major town centre". This is addressed further in section 5 (below) of this submission.
- 4.26. The College **supports** this proposal, and agrees that there are "exceptional circumstances" to justify the release of MOL. However, the College considers that the boundary should be realigned further south so as to release a small additional amount of [previously developed] land on the northern edge of the large area of MOL including the whole of the groundsman's house, its plot and land extending eastwards. This will allow the delivery of new housing led mixed use development on land fronting the newly re-routed highway together with a replacement pavilion located more centrally within the site and significant investment in the sports facilities at the site. The respective areas proposed in the Lewisham background paper and that proposed in the modification suggested by the College are shown on drawing no. 23.007 SK004 P2 – Proposed MOL Boundary, which is submitted alongside this Representation.
- 4.27. The LPA's proposed MOL boundary shown around the draft allocation in the Regulation 19 Local Plan does not follow any logical physical feature within the site, but instead seems to have been arbitrarily drawn.

- 4.28. As discussed below, while the College supports the principle of release of MOL to enable the realignment of the A205 and the regeneration of Catford town centre, it **strongly objects** to the new MOL boundary **as currently proposed**. The College requests that the proposal to release part of the MOL is modified by being redrawn with a slightly different boundary, enabling the satisfactory redevelopment of the area of land adjoining the new highway and providing revised access to the sports ground together with additional open playing fields on the western part of the site, which is currently occupied by the pavilion, which is proposed to be demolished and replaced in a more central location, as shown at drawing number 23.007 SK003 P2 – Proposed Masterplan.
- 4.29. The net impact of the proposals are neutral/positive in respect of the openness of the site.
- 4.30. The justification for the College's amendment of the proposed modification to the draft Reg 19 Local Plan is largely self-evident from the submitted plans and the Feasibility Study document prepared by Hollaway Studio and can be readily understood and appreciated on-site.
- 4.31. The policy test for release of MOL is the "exceptional circumstances" test in paragraph 140 of the Framework.
- 4.32. The Courts have established that this test, which is considered in the context of plan making, is a less stringent test than the "very special circumstances" test<sup>1</sup> which applies to applications for planning permission.
- 4.33. The benefits of the College's proposal include the provision of new and additional sports pitches, a new pavilion, new housing, new commercial spaces and essential new access to the Jubilee Sports Ground. Together these also enable the strategically important realignment of the South Circular and accompanying regeneration of Catford town centre, meaning that the exceptional circumstances test is amply met.
- 4.34. The new housing will provide much needed new homes in a highly sustainable location, close to public transport hubs and all the facilities of the regenerated town centre.
- 4.35. The additional sports fields will provide an important enhancement to the College's ability to outreach to the local community.
- 4.36. **Draft Site Allocation 21: Wickes and Halfords, Catford Road** proposes the redevelopment of the existing site to the west side of the Jubilee Sports Ground to deliver 512 homes together with c.9,000sqm of employment space and c.3,000sqm of main town centre use floor space.

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<sup>1</sup> See *Compton Parish Council v Guildford Borough Council* [2019] EWHC 3242 (Admin) per Sir Duncan Ouseley (sitting as a High Court Judge) at [70] and [71]:

"70. "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances." That difference is clear enough from the language itself and the different contexts in which they appear, but if authority were necessary, it can be found in *R(Luton BC) v Central Bedfordshire Council* [2015] EWCA Civ 537 at [56], *Sales LJ*. As *Patterson J* pointed out in *IM Properties Development Ltd v Lichfield DC* [2014] EWHC 2240 at [90-91 and 95-96], there is no requirement that Green Belt land be released as a last resort, nor was it necessary to show that assumptions upon which the Green Belt boundary had been drawn, had been falsified by subsequent events.

71. There is however a danger of the simple question of whether there are "exceptional circumstances" being judicially over-analysed. This phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary."

- 4.37. The College **supports** this allocation and the contribution the redevelopment of this site will have to the regeneration of Catford town centre. The College notes the allocation requires the delivery of improved connections between this site and the stations to the north and **supports** plans which will improve the pedestrian environment and connections along this part of the South Circular.
- 4.38. **Policies Map** changes are shown in a separate consultation document. An extract showing the proposed designation of the Jubilee Sports Ground is provided below for ease of reference.



- 4.39. A detailed map has not been produced by the Council showing the precise alignment of the new MOL boundary, but based on the information provided as part of proposed allocation 20, it is understood that the new MOL boundary will run east to west across the northern part of the Jubilee Sports Ground, removing the existing vehicular entrance to the site from the MOL together with most, but not all of the groundsman's house.
- 4.40. As explained above, this alignment coupled with the re-routing of the South Circular will have the effect of further blighting the groundsman's house and will render that part of the site undevelopable, meaning the situation will not be possible to resolve without the submission of a complex planning application and the detailing of a very special circumstances case.
- 4.41. As is explained in the following section of this Representation, it is considered that the currently proposed designation of the Jubilee Sports Ground fails to take into account the role the site can play in enhancing the town centre, the potential for the site to deliver significantly enhanced access to a regionally important sports facility and the importance of the site to meeting the Draft Plan's Spatial Strategy. Accordingly, the College **strongly objects** to the proposed MOL boundary **in its currently proposed alignment** across the northern part of the Jubilee Sports Ground.

- 4.42. However, the College outlines below how a slight adjustment to the alignment of the proposed MOL boundary would resolve concerns and would facilitate the delivery of both the College's vision for the future of the sports facility and the successful delivery of the re-routing of the South Circular.



## 5. MOL Release

- 5.1. This section of the Representation recaps the Council's proposal and exceptional circumstances case and then explains the College's proposed amendments to the Draft Local Plan. If the College's proposal is adopted then the concerns explained above will have been successfully resolved and will facilitate development at the Jubilee Sports Ground site which will fundamentally overhaul and enhance the facility with wide reaching benefits for the College and the local communities.
- 5.2. As is explained in more detail below, the College's proposal seeks a slight adjustment to the MOL boundary currently being proposed by the Council in the draft Local Plan. As such, this section also sets out the College's exceptional circumstances case.
- 5.3. In February 2023, LB Lewisham published a Metropolitan Open Land Exceptional Circumstances Paper ("the Paper"), which is a background paper which helps inform the preparation of the draft Local Plan. In part, the Paper presents the Council's exceptional circumstances case for the release of a small parcel of MOL land at Catford.
- 5.4. The Paper explains at para. 2.6 that case law and Local Plan EiP precedents in relation to MOL release suggest that any justification must be responsive to local condition, taking into account a range of factors including unique or significant local needs for certain types of development or infrastructure; tightly drawn MOL boundaries constraining other sites; and the opportunity to deliver social infrastructure which would bring about long-term benefits for local residents.
- 5.5. The Paper then sets out at para. 2.7 that the bar for demonstrating exceptional circumstances case is lower than the bar for demonstrating "very special circumstances" in the context of a planning application.
- 5.6. At Section 3 the Paper addresses the proposed release of MOL to the north of the Jubilee Sports Ground site. It explains that the new Local Plan proposes to de-designate a 0.49ha parcel of land, which represents only c.5% of the overall MOL area at the Jubilee Sports Ground (noting that the final proposed boundary remains to be confirmed).
- 5.7. At para. 3.4 the Paper explains, "A small loss of MOL is required to deliver the comprehensive regeneration of Catford major town centre by accommodating the realignment of the South Circular. Re-routing this main road is an integral component to unlocking development within the town centre..." Paragraph 3.5 continues, "...the case for exceptional circumstances is that without a small loss of MOL, there would be adverse implications for sustainable development as the comprehensive regeneration of Catford town centre cannot be fully realised, meaning the Council will fall significantly short of its development requirements and local residents will not experience the long-term benefits by having better access to both green and social infrastructure in a major centre."

## The College's Vision

- 5.8. The College has been in the process of reviewing how it currently uses the Jubilee Sports Ground, what sports should continue to be provided for, which can be relocated to the main school site and how the use of the site for sport can be optimised in future years. If the College's proposal is adopted then it is anticipated that the vision for the site could be realised within 5 years.
- 5.9. Given the limited use for athletics<sup>2</sup> (which can in any event would be better accommodated by working in partnership with the nearby Ladywell Track and Field site), the College's proposal is for the northern field to continue to provide a cricket square with additional football pitch capacity around it. The College's vision is for the site to become the main hub for football in SE London with significantly enhanced pitch quality and capacity together with a new pavilion which will allow for improved access for the relevant communities, external clubs and organisations. In recent years, the College has already begun a successful partnership with Tottenham Hotspur Football Club, based at the Jubilee Sports Ground, bringing significant benefits not only to the College but to local community and charitable groups. The College considers that the facility improvements contained within this vision will further accommodate such links with Premier League and EFL clubs, bringing significant benefits to the Catford community.
- 5.10. Alongside this, the College wants the site to be the focus for alumni events. At present, alumni events are either hosted at the main College site, or at the Old Dunstonian's Club in Park Langley (LB Bromley). A new pavilion with enhanced changing facilities and function space would also allow for extended use by the local community.
- 5.11. For this vision to be delivered, the existing inefficient and outdated pavilion needs to be replaced with a modern, accessible<sup>3</sup>, state of the art and environmentally sustainable facility with separate College and community changing facilities, new function space, a gym and studios.
- 5.12. The new pavilion will completely transform how the site can be used with much enhanced access being given to local schools, clubs and communities year round.
- 5.13. This Representation is supported by an initial vision for the site's future layout, showing the newly re-routed South Circular to the north, a new vehicular entrance to the site from Canadian Avenue, which leads to a new pavilion in the heart of the site with enhanced pitch capacity being delivered as a result.
- 5.14. Through the changes outlined below and on the attached plans, there is an exciting and truly unique opportunity to transform the relationship between the sports ground and the town centre, bringing the MOL into the town and creating a highly accessible, high quality, inclusive sports hub in the very heart of a regenerated major town centre.

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<sup>2</sup> It is noted that the Council's 2019 Playing Pitch Strategy also notes a low demand for athletics in the Borough. It confirms at pg.17 that the Ladywell Arena meets all athletics demand in the Borough.

<sup>3</sup> The existing pavilion is not fully DDA compliant and is only accessible at ground floor level.

- 5.15. The costs associated with delivering this vision are extremely high. As has been explained before, the College is a charity and so would be unable to afford to undertake such significant investment and development from financial reserves. It is important to note that whilst St Dunstan's College successfully positions itself as sector-leading, independent school that runs extensive means-tested bursary schemes to ensure its ongoing commitment to being a socially, intellectually and academically diverse school, unlike many independent schools, it does not have access to substantial endowments.
- 5.16. In the previous sections, the College's concerns regarding the proposed new MOL boundary have been articulated. This currently proposed boundary line will have the effect of blighting the groundsman's house and constraining its development potential. Moreover, the College has explained that the existing site is inefficient with large areas of land which are surplus to requirements and impose a management and cost burden.
- 5.17. Accordingly, the College's proposal is that the Council's suggested MOL boundary should be slightly adjusted, allowing for a small proportion of additional release of land from the MOL in order to create a development site between the re-routed South Circular and the re-arranged, consolidated and qualitatively and quantitatively enhanced sports facility.
- 5.18. The College has commissioned Hollaway Studio to prepare a set of drawings which accompany this Representation and which show the existing and proposed MOL boundaries and which indicate the scale and type of development which could be delivered within the site. Alongside this, they have identified pitch locations with run off areas which comply with Sport England guidance. Their indicative layout shows the pavilion being relocated to the heart of the site with this releasing space to the west for additional pitch capacity and their layout shows 2 additional pitches being delivered to the south of the site on the land previously used by Network Rail.
- 5.19. The College's vision requires the draft MOL line (which the Council has already noted may be subject to adjustment) being moved 12m to the south. This change will release an additional 2,040sqm of MOL for development across the site's frontage. This very small additional release amounts to only around 2% of the existing MOL area.
- 5.20. In total, therefore, the Council's proposal together with the additional release proposed by the College would amount to the de-designation of approximately 0.69ha of MOL across the northern part of the site, representing only approximately 8% of the total area.

## The exceptional circumstances case

- 5.21. The Council's exceptional circumstances case for the release of a 0.49ha parcel of land is that this is essential in order to deliver the re-routing of the South Circular, the regeneration of Catford town centre and to allow the Council to deliver sufficient housing to meet local needs. There are additional wide reaching benefits associated with the College's proposal, which are set out in the table below.
- 5.22. Before assessing these benefits, however, it is important to develop an understanding of the subject site's role in the MOL and the extent to which it meets the relevant tests, which are outlined at Policy G3 of the London Plan. Part B of the policy sets out 4 criteria for including land within the MOL. Land must meet only 1 of these in order to be designated such but clearly where land does not meet any of the criteria, the land should not be so designated. These criteria are set out below together with an assessment of whether the additional land to be released meets these.
- 5.23. First land should contribute to the physical structure of London by being clearly distinguishable from the built up area. The area of land which the College proposes to be released is not "clearly distinguishable" from the built up area. A large part of the land is already developed, containing a house, sub-station and office, sweeping areas of hardstanding forming the access road into the site and c.2m tall security fencing.
- 5.24. The land to be released from the MOL is not clearly distinguishable from the surrounding urban area. The land is already largely developed, including for housing use and is covered in large areas of hardstandings with fencing and gates.
- 5.25. When stood within the area of land which is proposed to be released from the MOL, the impression is that you are standing in an urban context with the A205 crossing to the north, the civic offices and core of the town centre to the east and the large commercial retail sheds beyond the railway lines to the west, all being prominent in views.
- 5.26. Within this part of the site, land forms part of the urban context. It is not clearly distinguishable from it and as such, this first criterion is not met.
- 5.27. Second, land should include open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. This criterion is clearly not currently met at the site (although notably could be if the College's proposal is adopted). The site is privately owned and operated and whilst the College allows access to the facilities, it would be incorrect to conclude that they are used by the whole or significant parts of London. As discussed above, the area which the College proposes should be removed is surplus to requirements and does not provide any pitch capacity.
- 5.28. Third, land must contain features or landscapes of either national or metropolitan value. This criterion is not met in the case of the Jubilee Sports Ground.
- 5.29. Finally, land must form part of a strategic corridor, node or link in the network of green infrastructure and meets 1 of the first 3 criteria. Thus, in the event that the site is deemed to form part of a strategic corridor, but does not meet any of the first 3 criteria, the land should not have been designated MOL.

- 5.30. Based on the above assessment, it is the College's position that the part of land at the Jubilee Sports Ground proposed to be removed from the MOL does not currently meet any of the tests outlined at London Plan Policy G3. However, it is the College's proposal that through the de-designation of a small amount of surplus land for development, the Jubilee Sports Ground can be transformed and can clearly meet the second criterion.
- 5.31. As introduced above, the table below outlines the key benefits which can already be identified if the College's proposed adjustment to the MOL is to be adopted.

Benefit	Explanation
Enhancing and expanding the College's charitable and community outreach programme	<p>At pgs.3-4 of this Representation, the College's charitable endeavours and community outreach work is introduced and summarised. That which is set out above is a summary of only the last year's work.</p> <p>If the College's proposal is adopted, the Jubilee Sports Ground will be the focal point for a far expanded programme of work with the local community in Catford and Lewisham more generally as well as with alumni. There will be additional capability to allow use of the pitches by other local schools and community groups to ensure enhanced life opportunities for residents in one of the top 10% most deprived parts of a Borough, which itself is among the most deprived in London and the country as a whole.</p>
Enhancing the site's role in the MOL	<p>Through the development, expansion and qualitative and quantitative enhancement of the sports facilities at the site, as well as the development facilitating significantly enhanced access to the sports facilities by the community, the site will meaningfully meet the second criterion at London Plan Policy G3.</p> <p>As explained above, the College's vision is for the site to be the main hub for football in SE London, attracting children's, men's and women's football teams as well as supporting other sports and the expansion of the College's pioneering gender neutral sports programme.</p>
Providing enhanced access to sport and tackling health and obesity	<p>A future development proposal can be supported by a Health Impact Assessment, but the draft Local Plan identifies concerning statistics around obesity in the Borough with more than 50% of adults being overweight or obese, with 22% of reception aged children being overweight, rising to 38% in year 6.</p> <p>There is a clear and urgent requirement to encourage increased participation in sport in the Borough, which begins through the delivery of enhanced facilities with wider public access.</p> <p>If a small amount of additional land is released from the MOL, the College will be able to deliver meaningful development across the site's frontage which will cross-subsidise the delivery of the enhanced sports facilities at the site as well as the new pavilion with gym and studio facilities.</p>

<p>Enhanced football provision in the Borough</p>	<p>The Council's Playing Pitch Strategy (June 2019) sets out at Table 3.1 that although the quality of football across the Borough is good with no poor pitches being identified, there are a number of sites which are close to the poor rating. It goes on to say that there is a large amount of deficit in the Borough for pitches (i.e. a quantitative deficit) with only 3 sites providing pitches with a long term security use agreement. As a result, the Strategy notes that the sites have no spare pitch capacity during the peak period and thus there is no prospect for growth.</p> <p>If the site is developed along the lines indicated by the College, it can provide additional capacity and access so desperately in need in the Borough.</p>
<p>Enhancing community facilities</p>	<p>There are spaces within the existing pavilion which can be used by the local community for functions, events and meetings, but the facility is now at the end of its economic lifespan and is in need of replacement.</p> <p>The proposed development to the front of the site would fund the facilities that will be available for use by the school community (including alumni) and the communities in Catford, Lewisham and beyond. The proposed new pavilion would enhance viewing and surveillance on a centrally located new site between pitches</p>
<p>Resolving the blighted groundsman's house and releasing other unprotected land for development</p>	<p>Without the slight adjustment to the MOL boundary, the groundsman's house will become blighted and there would be more limited opportunity for this to be resolved through the submission of a planning application.</p> <p>If the College's proposed boundary is adopted, there will be no barrier to the principle of the redevelopment of that site to deliver housing and commercial spaces.</p> <p>Moreover, the change would facilitate the recycling of previously developed land for housing, employment and other uses in a highly sustainable and accessible location.</p>
<p>Delivering housing, including affordable housing</p>	<p>The initial feasibility proposal prepared by Hollaway architects has been designed around the proposed plans for the re-routed South Circular. It is clear that the site could accommodate a significant number of homes, making an important windfall contribution towards housing and affordable housing delivery in Lewisham.</p>
<p>Enhancing the public realm and providing access to additional public open space</p>	<p>The Hollaway proposal indicates a substantial gap between the blocks, which is proposed to comprise new high quality public realm, open space and playspace as well as forming an attractive pedestrian entrance into the Jubilee Sports Ground site direct from the town centre.</p>
<p>Delivering new commercial and educational space and economic growth</p>	<p>The proposed NW block would likely contain a mix of educational or school administration space at ground floor level within the sports ground site and commercial space above at upper ground level where the South Circular rises to cross the railway.</p> <p>Commercial space would also be proposed at ground floor level in the NE block.</p> <p>The delivery of these spaces would improve the town centre, creating additional jobs and economic growth through the construction and operational phases of the development.</p>

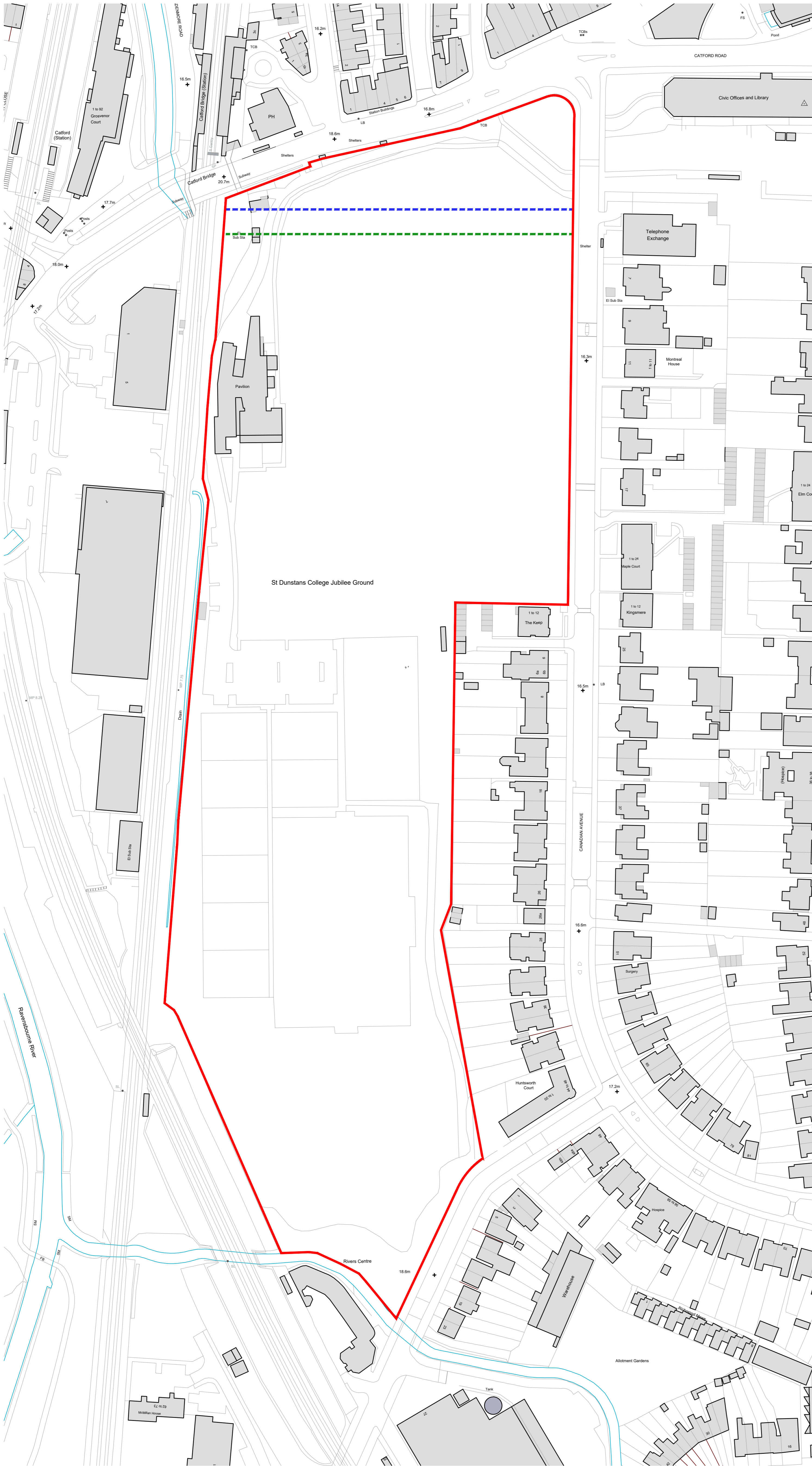
<p>Enhancing the regeneration of the town centre through improved legibility and linkages</p>	<p>Linked with the above, the development of the northern part of the site would enhance legibility along the south side of the town centre, creating clear visual links between the otherwise dispersed parts of the extended Catford town centre.</p> <p>The development would also facilitate new functional and physical links between the town centre and the MOL, which currently do not exist.</p>
<p>Delivering an improved, environmentally sustainable pavilion</p>	<p>The existing pavilion is outdated and of an unsustainable design. By contrast a new pavilion would be of a highly sustainable design and construction, being energy efficient and thus reducing the school's carbon footprint. Unlike the existing facility, the new pavilion would also provide an inclusive, accessible space, available for all to use.</p>
<p>Enhanced biodiversity and urban greening</p>	<p>The development of the site presents a further opportunity to extensive landscaping around the site potentially to include substantial tree and hedgerow planting and the formation of ecological areas, particularly towards the south of the site along the bank of the Ravensbourne River. It is anticipated that the development would present an opportunity for significant biodiversity net gains and enhanced urban greening.</p>

5.32. The raft of tangible benefits outlined above will only be realised if the slight MOL boundary adjustment advocated by the College is supported. If the status quo is maintained, the opportunity to realise these significant public, social, environmental and economic benefits will be lost.

## 6. Conclusion

- 6.1. The College strongly supports, in principle, the Council's proposals for Catford town centre and the realignment of the A205 South Circular in the Regulation 19 draft Local Plan.
- 6.2. The College also strongly supports the release of part of the Jubilee Sports Ground from MOL.
- 6.3. The College does **not** support the currently proposed southern boundary of the proposed released area, which will cause blight to the College's land, including the groundsman's house.
- 6.4. Accordingly, the College proposes an alternative, slightly enlarged area of released land, which is still principally on previously developed land, which should be released from the MOL, whilst retaining and enlarging the open area of pitches on the College's site.
- 6.5. The College's proposals would deliver additional benefits in the form of a housing led mixed use development on the northern edge of the site. The overall effect of such a development on openness would be neutral.
- 6.6. The development of housing in this highly sustainable and accessible location would enable the delivery of improved sports facilities at the site together with a new pavilion. The new pavilion would provide an inclusive and accessible space and given the additional changing facilities which would be provided, the College would be able to expand significantly the community outreach programme which operates at the site, allowing much enhanced access to the new and improved facilities.
- 6.7. Exceptional circumstances exist to support the College's proposals for release of land from the MOL and the redevelopment of the pavilion.
- 6.8. The College urges the Council to accept and support its proposals and to make appropriate modifications to the draft Local Plan accordingly.

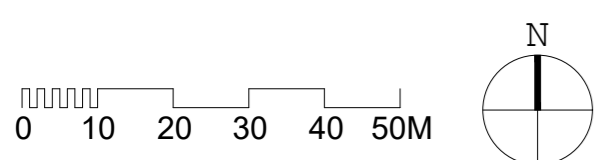




Existing Site Ownership Boundary

New MOL boundary as defined by Lewisham Council

Proposed new location for MOL boundary taking into consideration the sports field layouts



# Hollaway

London | 10a Acton Street | London | NCLX 9HG  
 T +44 (0) 20 7096 5425 | E london@hollawaystudio.co.uk | www.hollawaystudio.co.uk  
 Dept | The Tramway Studios | Bessett Road | Ryde | Isle of Wight | PO33 3SD  
 T +44 (0)1303 260 515 | E hants@hollawaystudio.co.uk | www.hollawaystudio.co.uk

Project | ST DUNSTONS COLLEGE JUBILEE GROUND  
 ST DUNSTONS COLLEGE STANSTEAD RD

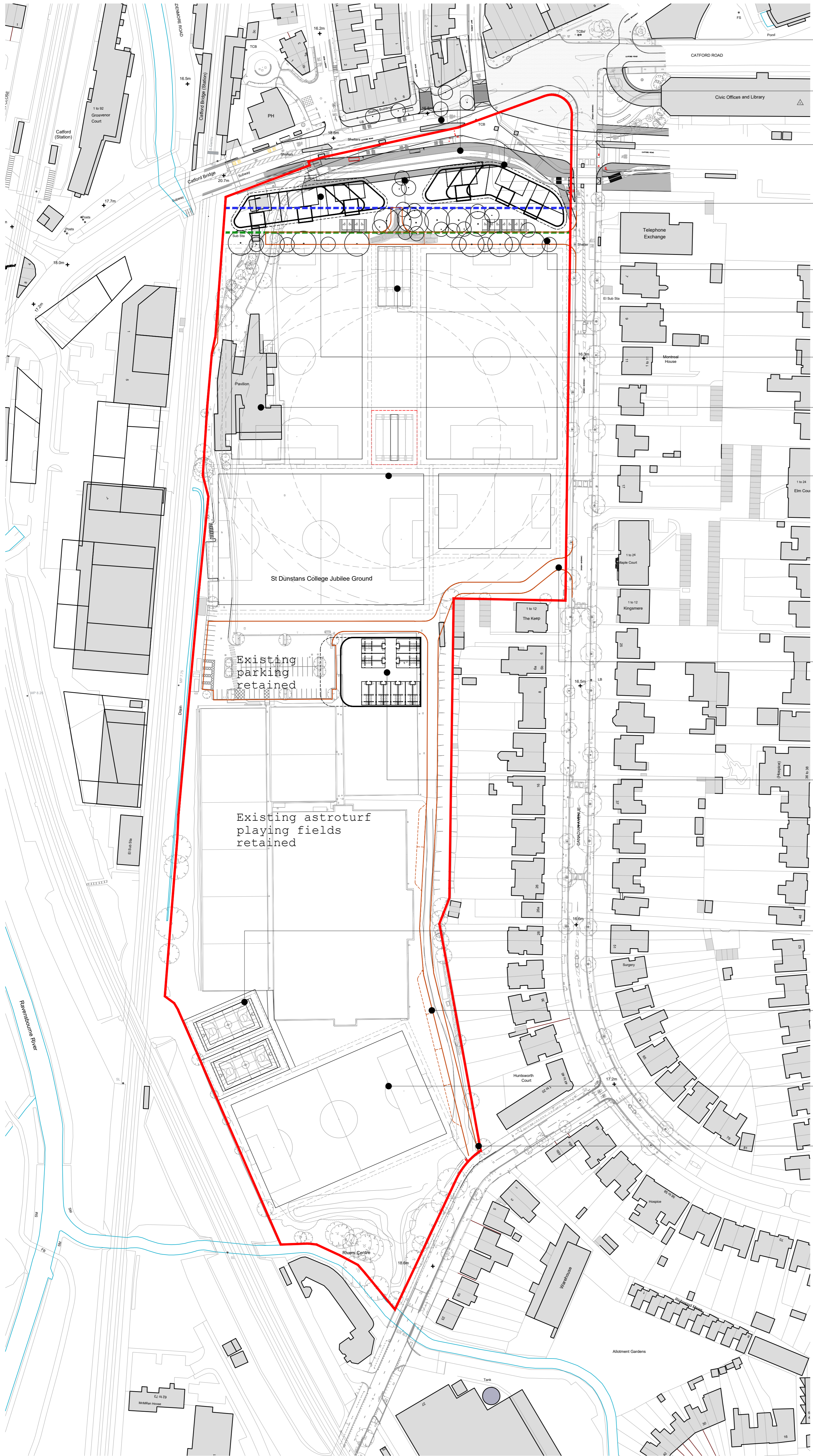
Client | ST DUNSTONS COLLEGE

Title | PROPOSED MOL BOUNDARY

Status | PRELIMINARY

Scale@A1 | 1:1000 Date | APRIL 2023 Drawn | AA Chk'd | AR

Project Number | 23.007  
 Drawing Number | SK004  
 Revision | P2  
 Bim Number | 23.007-GHA-XX-XX-DR-A-SK004-S0-P2



- Proposed new route of the A205
- Proposed Footpath & cycle path
- Proposed residential block with public space / commercial at ground floor
- Proposed open space and addition to the public realm providing pupils access to the sports ground
- Proposed new maintenance / refuse access
- Proposed 4 x cricket nets
- Proposed Residential Block with nursery / offices at ground level
- Existing pavilion to be consolidated and relocated to provide a more centralised pavillion and viewing area
- 3 x 11 a side full sized football pitches and 1 x 7 a side pitch proposed. Additional smaller pitches to be marked across full size pitch as required.
- New vehicular access from Canadian Avenue taking into account the protected trees along the roadside
- Potential location of new sports pavilion providing circa 16 changing rooms. Existing 2 x pitches in this location relocated further south.
- Proposed two replacement MUGA pitches providing tennis, basketball and netball courts
- Circa 6no. 60 person coach parking proposed
- under 14s 11 a side astroturf pitch at the southern field
- Maintenance / emergency access and potential coach access - Existing access from Fordmill Rd

- Existing Site Ownership Boundary
- Proposed new location for MOL boundary taking into consideration the sports field layouts
- New MOL boundary as defined by Lewisham Council
- Proposed new roads

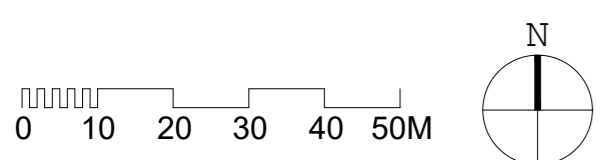
# Hollaway

London | 10a Acton Street | London | NCLX 9ND  
 T +44 (0) 20 7096 5425 | E london@hollawaystudio.co.uk | W www.hollawaystudio.co.uk  
 North | One Framley Studio | Bessing Road | Ryde | Isle of Wight | PO21 3SD  
 T +44 (0)1303 260 515 | E hants@hollawaystudio.co.uk | W www.hollawaystudio.co.uk

Project | ST DUNSTONS COLLEGE JUBILEE GROUND  
 ST DUNSTONS COLLEGE STANSTEAD RD  
 Client | ST DUNSTONS COLLEGE  
 Title | PROPOSED MASTERPLAN  
 Status | PRELIMINARY

Scale@A1 | 1:1000 Date | APRIL 2023 Drawn | AA Chk'd | AR

Project Number | Drawing Number | Revision  
**23.007** | **SK003** | **P2**  
 Bim Number 23.007-GHA-XX-XX-DR-A-SK003-S0-P2



# St. Dunstan's College Jubilee Grounds

# Site Location

The site is located Catford. The South East London District is part of the London Borough of Lewisham.

The Jubilee Grounds are located a short distance away from the main St Dunstan's College and houses most of the colleges sports playing fields.

The site lies within the Culverley Green conservation area and is adjacent to Metropolitan Open Land.



 EXISTING SITE BOUNDARY

 ST DUNSTAN'S COLLEGE

# Existing Site



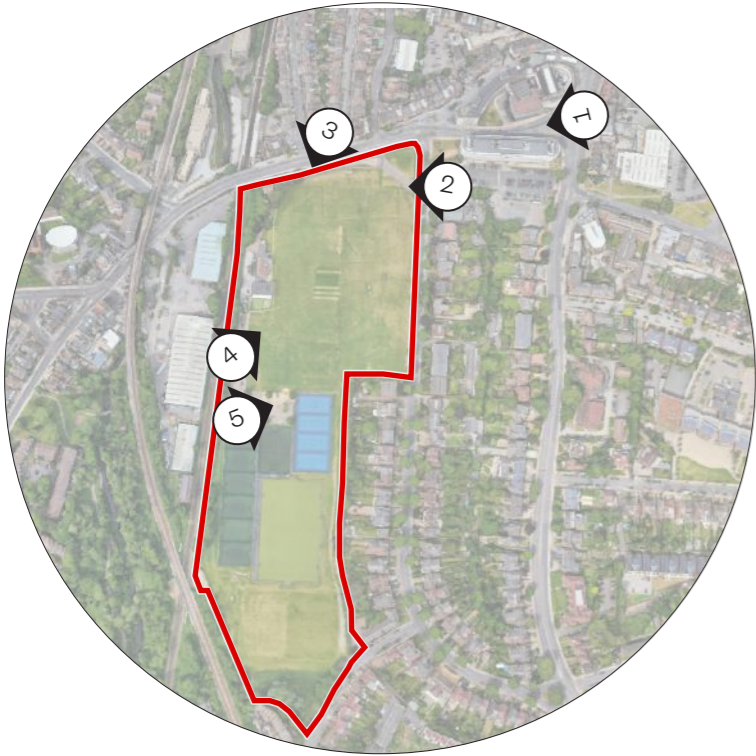
VIEW FROM THE CATFORD ROAD LOOKING WEST TOWARDS THE SITE



VIEW OF EXISTING VEHICULAR ACCESS FROM CANADIAN AVENUE



VIEW LOOKING SOUTH WEST FROM THE A205



N  
SITE BOUNDARY



VIEW OF THE EXISTING PAVILION



VIEW OF JUBILEE GROUNDS FROM THE EXISTING CAR PARK

# Existing Site

1

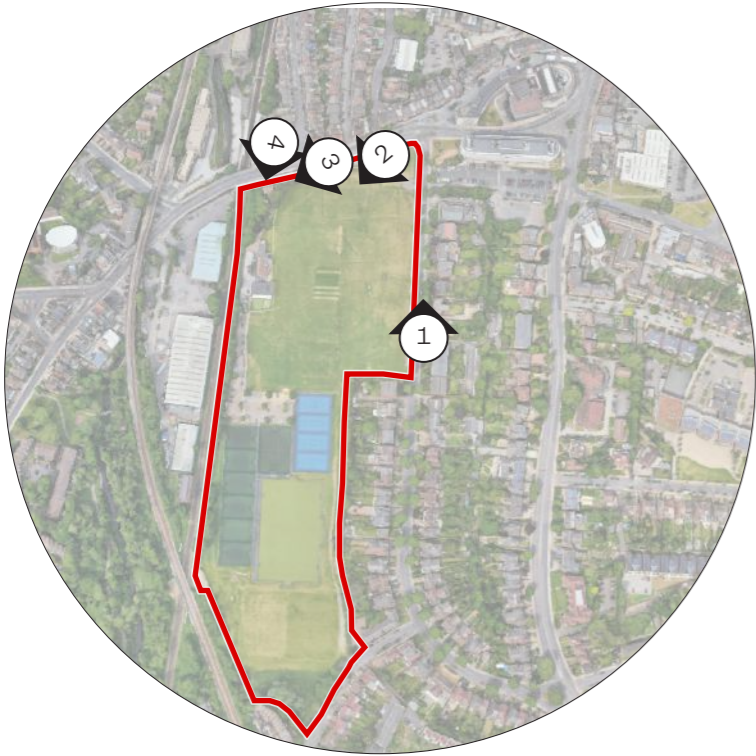


VIEW LOOKING NORTH FROM CANADIAN AVENUE

2



VIEW LOOKING SOUTH WEST FROM THE A205



SITE BOUNDARY

3

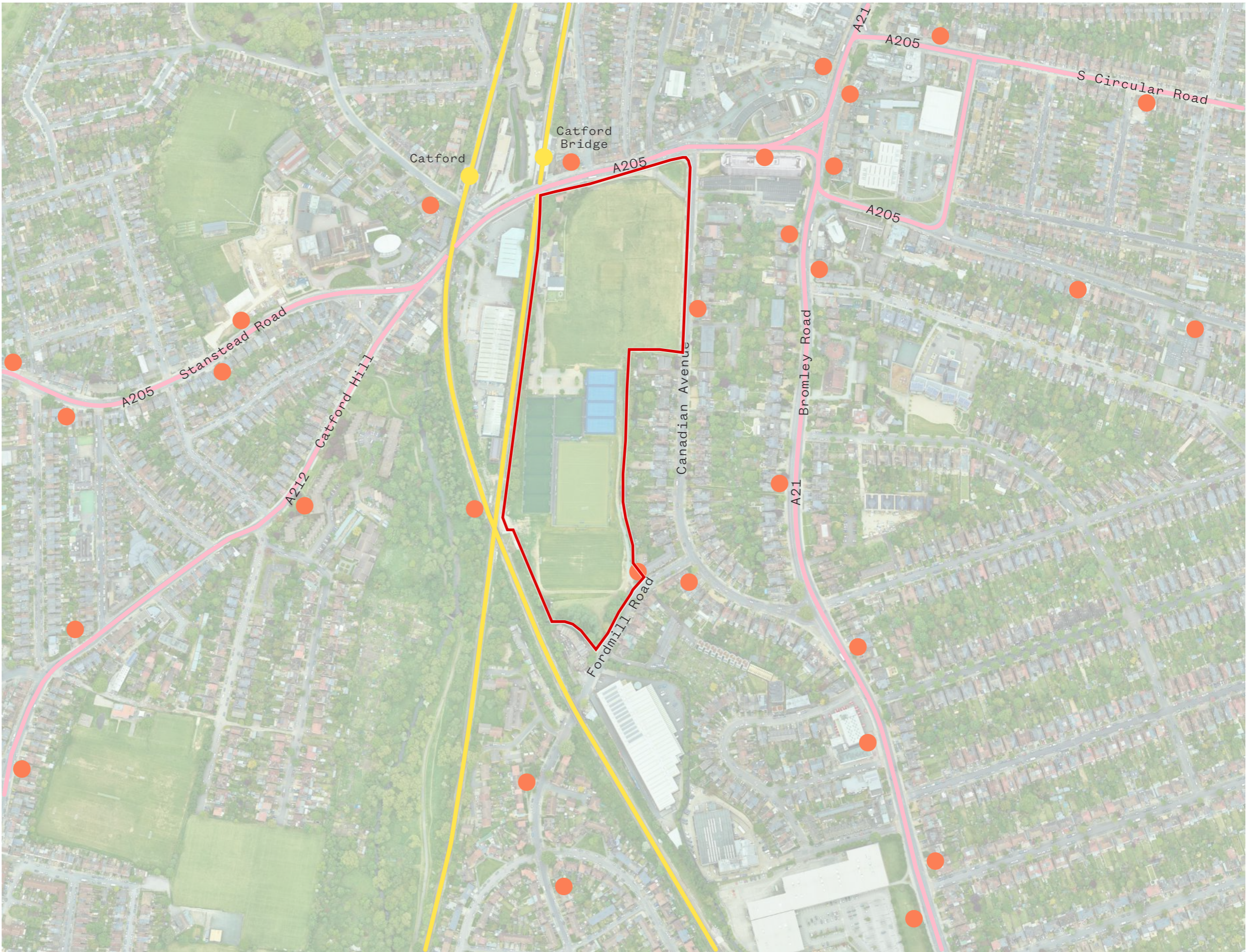


VIEW LOOKING WEST ALONG THE A205 TOWARDS THE BRIDGE

4



VIEW FROM A205 BRIDGE LOOKING SOUTH

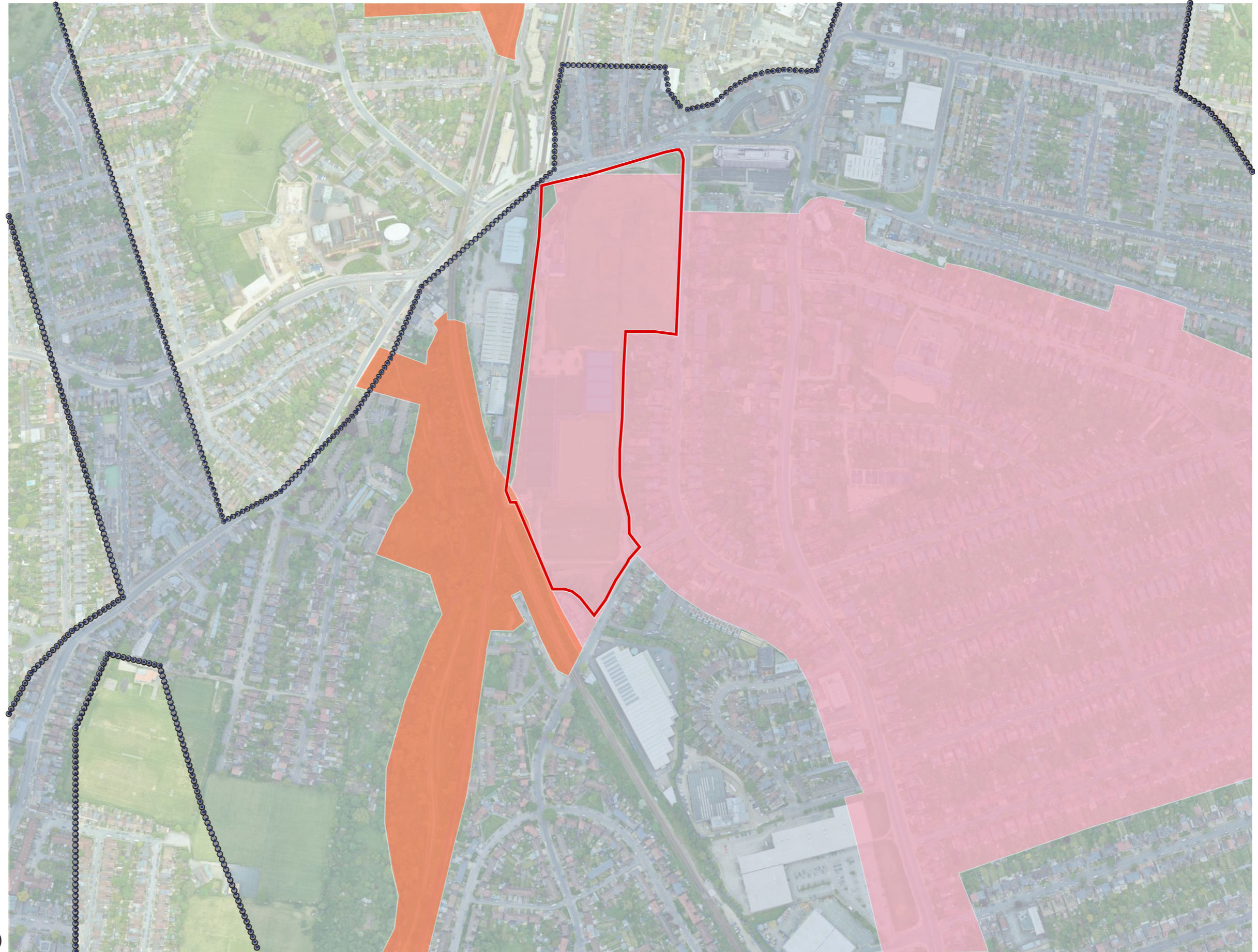


- PRIMARY ROADS
- RAIL CONNECTION
- BUS STOP
- SITE BOUNDARY

# Site Analysis

The site sits within a conservation area and area of archaeological priority.

The site sits adjacent to an area of importance for nature conservation.



- CONSERVATION AREA
- SITE OF IMPORTANCE FOR NATURE CONSERVATION
- AREA OF ARCHAEOLOGICAL PRIORITY
- SITE BOUNDARY



# Analysis of the TFL Proposal for A205

NEW RAMP TO EXISTING SUBWAY

POSSIBLE NEW ACCESS STEPS TO SPORTS GROUND

PROPOSED BUS STOPS

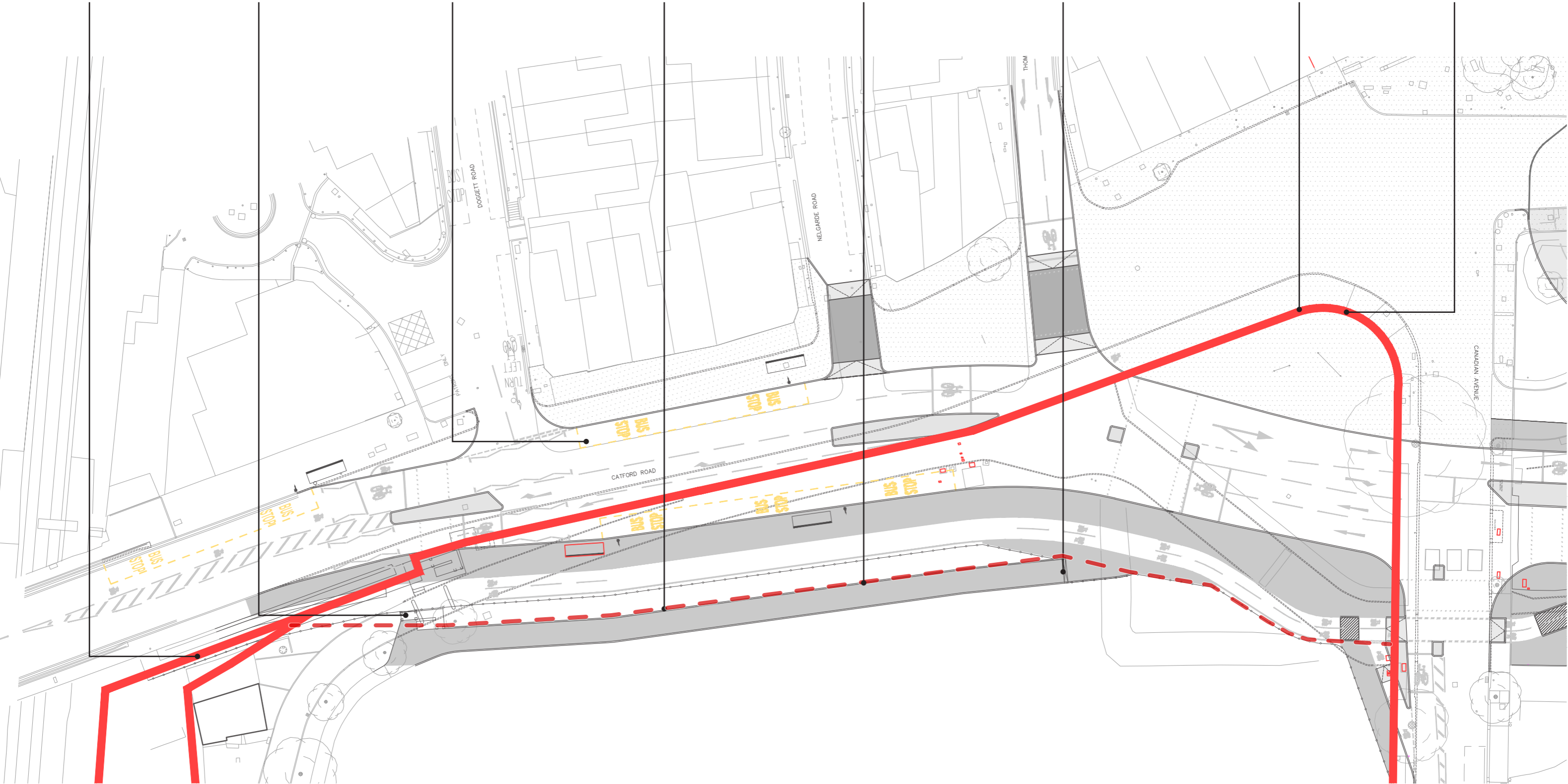
REPLACED NEW PEDESTRIAN / CYCLE PATH ASSUMED TO BE WITHIN THE SITE

POTENTIAL NEW SITE BOUNDARY

NEW GATED PEDESTRIAN / CYCLE ACCESS

DASHED LINE INDICATES EXISTING A205 ROUTE

EXISTING SITE BOUNDARY





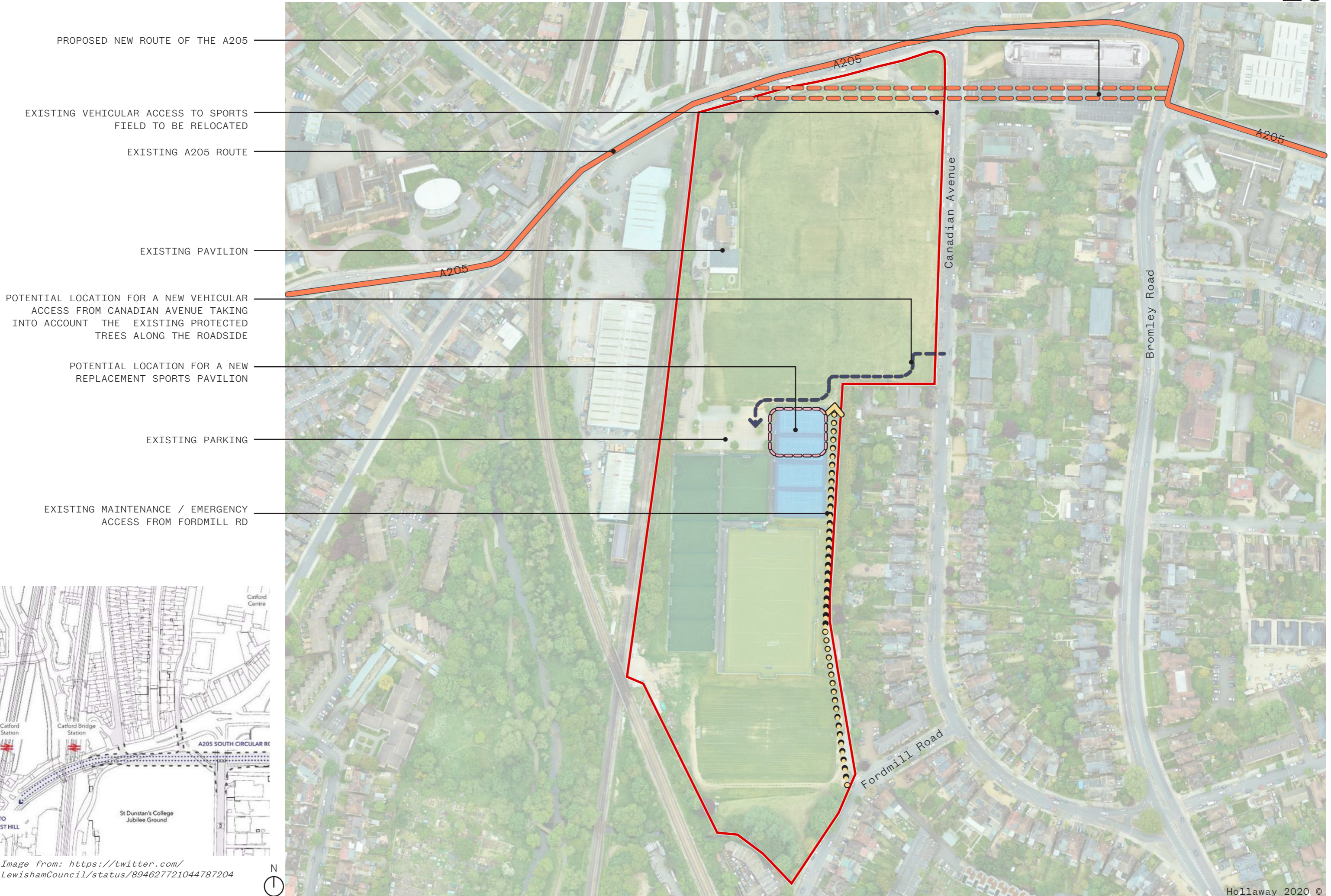
- PARK
- SCHOOL
- CHURCH
- LIBRARY
- COMMERCIAL
- URBAN GREEN SPACE
- PUBLIC OPEN SPACE
- SITE BOUNDARY

Flood map for planning shows that the site sits in flood zones 2 & 3.

An initial high level conversation with specialist consultants has established that the flooding is less drastic than shown in the flood map.

Detailed flood modelling and analysis will need to be carried out in the future.





PROPOSED NEW JUNCTION BETWEEN THE A205 AND CANADIAN AVENUE PROVIDES AN OPPORTUNITY TO CREATE A WELCOMING LANDMARK ARCHITECTURE THAT ENGAGES PEDESTRIANS WITH AN ACTIVE FRONTAGE AND PROVIDES A VISUAL SENSE OF ARRIVAL

THE NORTH WEST CORNER OF THE SITE CURRENTLY HOUSES THE GROUNDSMAN'S ACCOMMODATION AND WOULD LEND ITSELF TO AN IDEAL LOCATION FOR A LANDMARK ARCHITECTURE THAT CAN BE SEEN AS VEHICLES AND PEDESTRIANS CROSS OVER THE BRIDGE

THE SPORTS FIELD IS ONE OF THE FIRST VIEWS OF CATFORD FROM CATFORD BRIDGE STATION AND PROVIDES AN OPPORTUNITY TO CREATE A LANDSCAPED PUBLIC OPEN SPACE THAT PROVIDES A SENSE OF ARRIVAL AND CONNECTS THE VARIOUS OTHER PUBLIC OPEN SPACES PROPOSES WITHIN THE CATFORD TOWN CENTRE FRAMEWORK

POTENTIAL NEW LOCATION FOR A REPLACEMENT SPORTS PAVILION PROVIDING A MORE CENTRALISED LOCATION CLOSE TO THE EXISTING CAR PARK AND IN PROXIMITY TO THE PREFERRED NEW ACCESS LOCATION



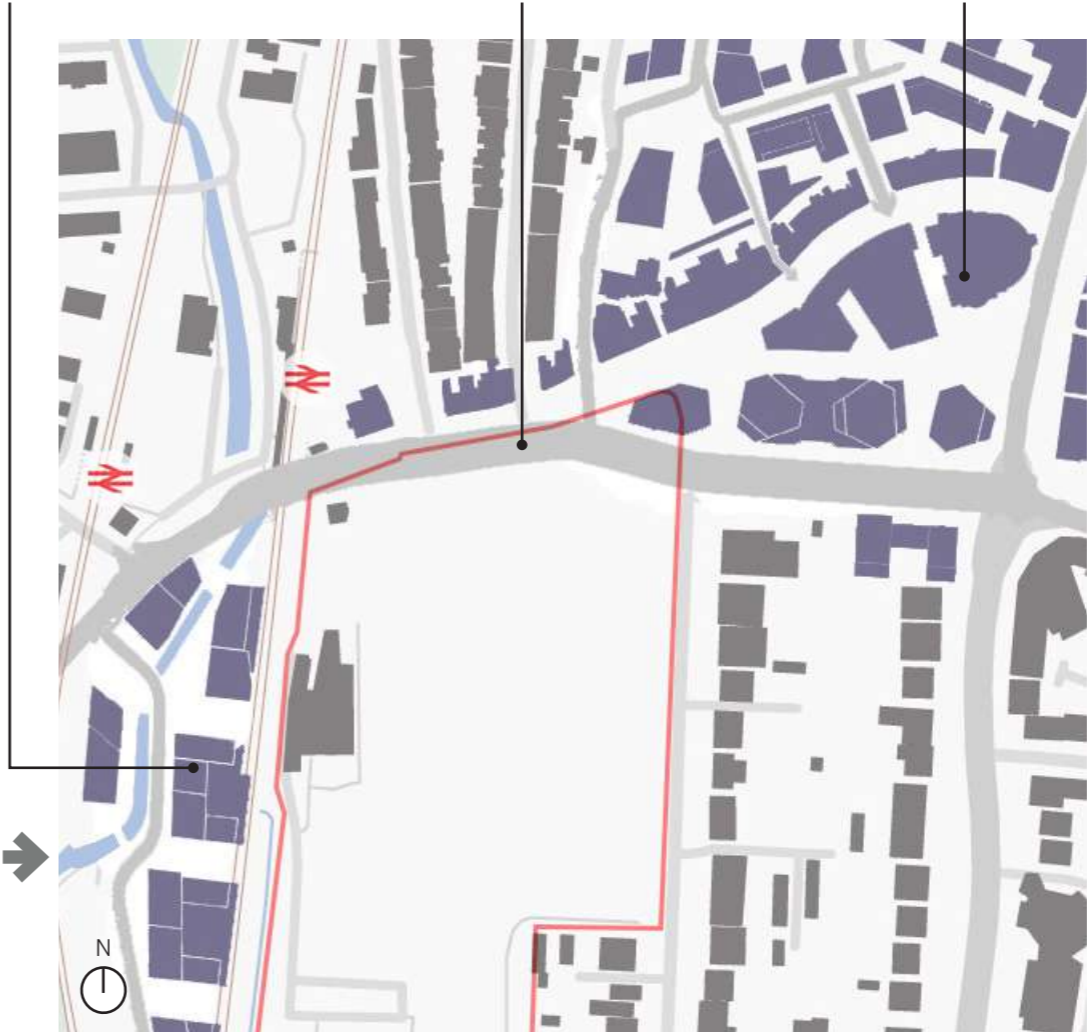
NEW RAVENSBOURNE QUARTER:  
RESIDENTIAL BLOCKS UP TO 20  
STOREYS AND PUBLIC REALM RE-  
ALIGNING AND UNCOVERING THE  
RIVER

A205 REDIRECTED TO  
CREATE A MORE EFFICIENT  
ROAD LAYOUT AND CREATE  
MORE PEDESTRIANISED  
PUBLIC REALM

THE CIVIC CENTRE:  
PUBLIC REALM AT GROUND  
LEVEL WITH ACTIVE FRONTAGES,  
COUNCIL OFFICES, CINEMAS  
ETC. WITH RESI AT TOP FLOORS



EXISTING ROADWAYS AND BUILDINGS



FUTURE VISION FOR CATFORD TOWN CENTRE

○ EXISTING SITE BOUNDARY

### PUBLIC OPEN SPACES

PROPOSED AREA OF PUBLIC REALM / OPEN SPACE BECOMES ONE OF THE FIRST VISIBLE PUBLIC AREAS VIEWABLE FROM THE ENTRANCE OF CATFORD BRIDGE STATION



- PUBLIC OPEN SPACES AS DEFINED BY CATFORD TOWN CENTRE FRAMEWORK
- POTENTIAL TO CREATE A CONNECTING PUBLIC OPEN SPACE

### ACTIVE FRONTAGE

PROPOSED AREA OF ACTIVE FRONTAGE BECOMES ONE OF THE FIRST VISIBLE PUBLIC AREAS VIEWABLE FROM THE ENTRANCE OF CATFORD BRIDGE STATION



PROPOSED AREA OF ACTIVE FRONTAGE ADDRESSES THE PROPOSED NEW JUNCTION BETWEEN THE 1205 AND CANADIAN AVENUE

- ACTIVE FRONTAGE AS PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- POTENTIAL TO CREATE CONNECTED ACTIVE FRONTAGE

EXITING SITE BOUNDARY

AFFECTS OF THE PROPOSED A205 ON THE SPORTS FIELD



- EXTENT OF PROPOSED SPORTS FIELDS
- PROPOSED ROUTE OF THE A205
- EXISTING POSITION OF THE A205
- NOISE AND POLLUTION FROM THE A205 AFFECTING THE SPORTS FIELDS GETTING WORSE AS THE PROPOSED A205 ROUTE SHIFTS FURTHER SOUTH
- OPPORTUNITY FOR A PROTECTIVE BARRIER BETWEEN A205 AND THE SPORTS GROUND

○ EXISTING SITE BOUNDARY

BUILDING HEIGHTS



POTENTIAL FOR DEVELOPMENT WITH ACTIVE FRONTAGE AT GROUND FLOOR AND INCORPORATING PUBLIC REALM AND OPEN SPACE.

- 17-20 STOREYS BUILDING PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- 13-16 STOREYS BUILDING PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- 9-12 STOREYS BUILDING PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- 6-8 STOREYS BUILDING PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- 3-5 STOREYS BUILDING PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- 1-2 STOREYS BUILDING PROPOSED BY CATFORD TOWN CENTRE FRAMEWORK
- PROPOSED 7-12 STOREYS BUILDING
- PROPOSED 4-6 STOREYS BUILDING
- PROPOSED 1-3 STOREYS BUILDING

Reference - <https://lewisham.gov.uk/inmyarea/regeneration/catford-regeneration/catford-town-centre-framework>



# Proposed strategic masterplan

NEW ROUTE OF THE A205 AND FUTURE VISION OF CATFORD CIVIC CENTRE SHOWN FOR CONTEXTUAL INFORMATION

PROPOSED RESIDENTIAL BLOCKS WITH ACTIVE STREET FRONTAGES AND COMMERCIAL / NURSERY / OFFICES AT GROUND LEVEL. THE BUILT FORM AND LANDSCAPING WILL HELP FORM A BUFFER BETWEEN THE A205 AND JUBILEE GROUND

PROPOSED LANDSCAPED PUBLIC REALM

PROPOSED NEW EMERGENCY/MAINTENANCE ENTRANCE

PROPOSED NEW VEHICULAR ENTRANCE

PROPOSED NEW RELOCATED SPORTS PAVILION

EXISTING PARKING AREA RETAINED

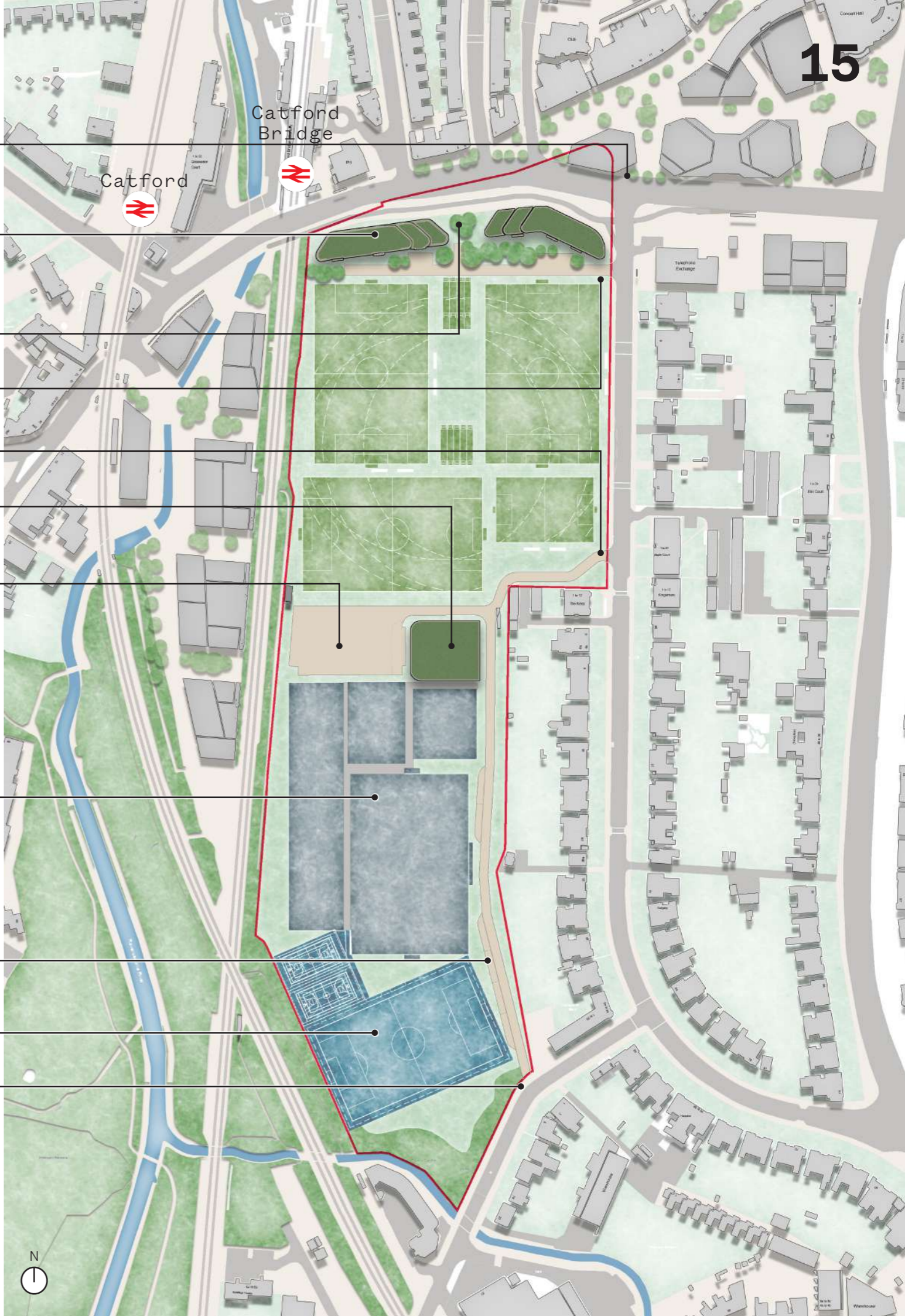
EXISTING ASTROTURF PLAYING FIELDS

PROPOSED COACH PARKING

PROPOSED NEW ASTROTURF PLAYING FIELDS

VEHICULAR ENTRANCE FROM FORDMILL RD RETAINED FOR EMERGENCY, MAINTENANCE AND COACH ACCESS

● EXISTING SITE BOUNDARY





2020 RICS South East Awards Commercial Category Winner (Curious Brewery)  
2019 FX Awards (Curious Brewery) Shortlisted  
2019 Blueprint (Process Gallery) Shortlisted  
2019 AJ Architectural Award (Process Gallery) Shortlisted  
2019 AJ Architectural Award (Curious Brewery) Shortlisted  
2019 Dezeen Award (Process Gallery) Longlisted  
2019 AJ Retrofit Award (Gin Works Chapel Down) Shortlisted  
2019 RIBA South-East Regional Award (Process Gallery)  
2019 BD Awards shortlisted for Small Project of the Year Category  
2019 BD Awards shortlisted for Retail & Leisure Architect of the Year  
2018 George Clarke Medal Winner (The Cottage)  
2018 Property Week Student Accommodation Awards Highly Commended (Palamon Court)  
2018 What Awards 'Best Luxury House' Silver Winner (Manor Barn)  
2018 The Sunday Times British Home Awards Winner (The Cottage)  
2018 AJ Retrofit Awards Finalist (The Cottage)  
2018 BD Architect of the Year Award shortlisted for Individual House  
2015 RIBA South-East Regional Award (Pobble House)  
2014 Kent Design Award (Best Small Project)  
2013 WAN World Architecture News Facade of the Year (Crit Building)  
2012 Kent Design Awards Overall Winner (Rocksalt Restaurant)  
2012 RIBA Downland Award (Rocksalt Restaurant)  
2012 RIBA Downland Award (The Marquis)  
2012 Restaurant & Bar Design Award Shortlisted  
2011 FX International Interior Design Shortlisted  
2011 WAN Commercial Shortlisted  
2011 RIBA Downland Prize (Commended)  
2010 RIBA National Award Shortlisted  
2010 Kent Design Awards (Best Education Category)  
2010 Building Design & Construction Award (Best Educational Building)  
2010 Building Design & Construction Award (Public/ Community Building)  
2009 Evening Standard New Homes Award Shortlisted  
2008 RIBA Downland Prize (Residential Leisure)  
2008 'Britain's Best Home' (Final Six)  
2007 Kent Design Award (Best Small Project)  
2007 RIBA Downland Prize (Best Conversion)  
2007 Kent Design Award (Education Shortlisted)  
2006 'What House' Award (Best House)  
2005 RIBA National Award  
2004 Kent Design Award (Overall Winner)  
2004 Kent Design Award (Education Category)  
2000 National Built In Quality Award

**London**

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# Ravensbourne Retail Park

## Local Plan Representation

April 2023



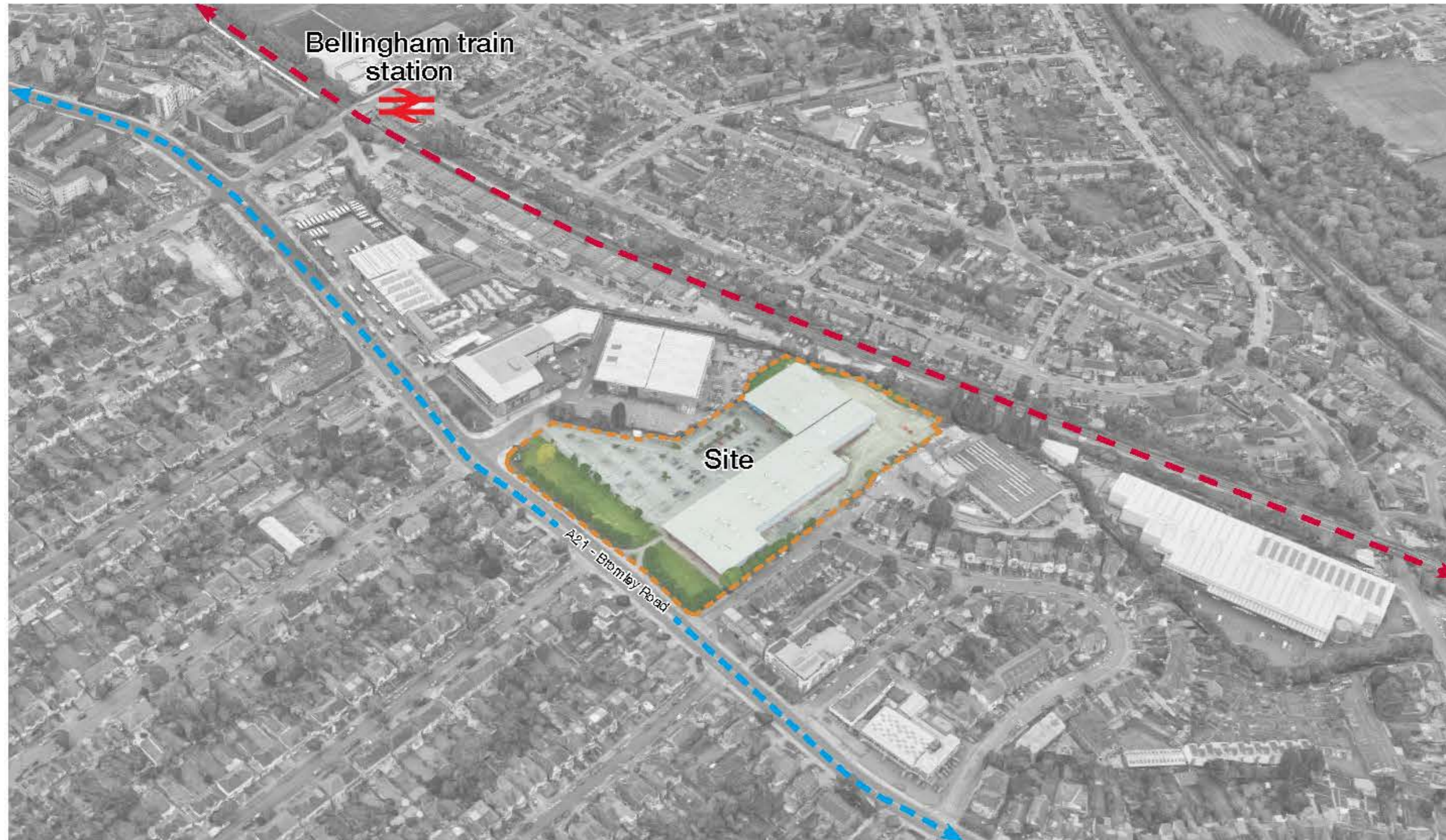
Patel Taylor



Patel Taylor have prepared this Design Brochure on behalf of our client, Royal London Mutual Insurance Society Limited ("RLMIS" / "Client"), to support representations in response to the consultation on the "Lewisham Local Plan: Proposed Submission Document" (Regulation 19) in relation to Ravensbourne Retail Park (the "Site"). The Site is subject to a draft allocation for residential-led redevelopment within the draft Local Plan, identified as 'Site 22 Ravensbourne Retail Park'. These representations support the draft Site Allocation 22 the site's inclusion in the final Local Plan once adopted. These representations however propose refinements to the draft allocation to ensure the site reflects market context and optimises the development potential of the Site.

# Site overview

## Site overview



Ravensbourne Retail Park is located in south east London within the Borough of Lewisham.

The site is currently occupied by a large retail park spanning over 72,000 sq ft and is occupied by The Gym, B&M, Wren Kitchens & Dunelm. Adjacent to the park is a Selco Builders Warehouse. Ravensbourne Retail Park fronts the A21 corridor being just south of Catford Town Centre. The frontage facing Bromley road partially sits inside the Culverley Green Conservation Area. Just south of the site is the Thameslink Bellingham Train Station.

The area is characterised by low-rise housing with the tallest building being the Delamare court housing at 6 storeys in height.

Site Context



- 1. Selco and retail units
- 2. Barmeston Road facing towards retail units
- 3. South entrance
- 4. Pedestrian entrance through conservation area
- 5. Stagecoach Catford Garage
- 6. Low rise housing



Existing industrial uses



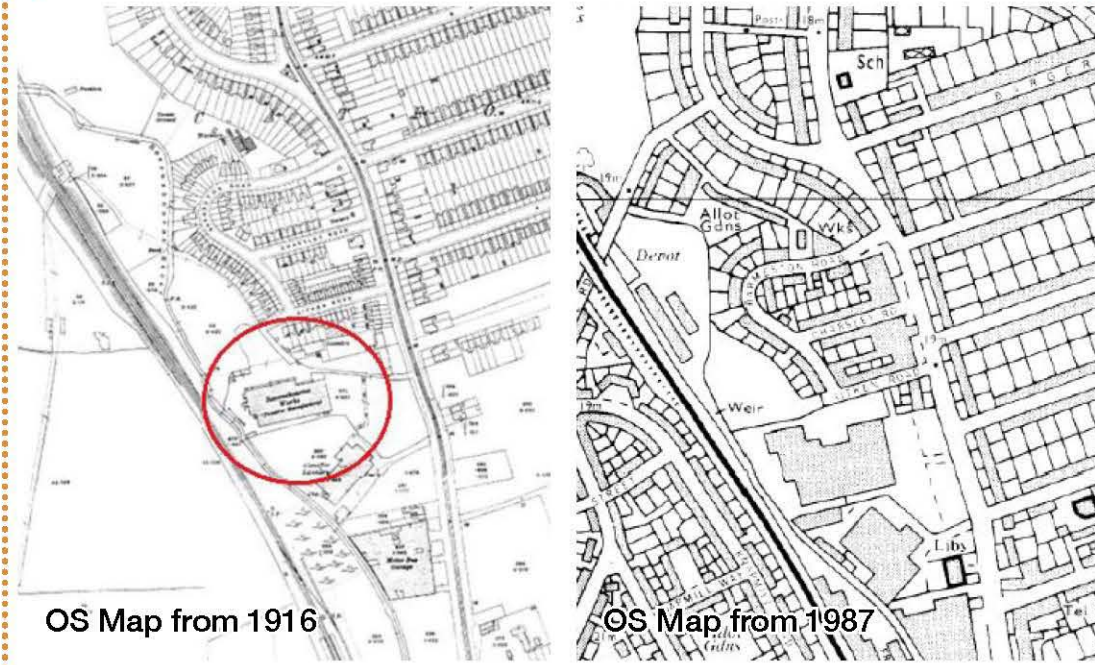
Units	Approximate GIA
1	c.1,393 sqm
2	c.1,624 sqm
3	c.923 sqm
4	c.1,859 sqm
5	c.930 sqm
<b>Total</b>	<b>c.6,729 sqm</b>

# Site history

In the 19th Century the site was agricultural land

Robertson's Jam Factory opened in the early 20th Century

The site was converted into a retail park at the end of the 20th Century

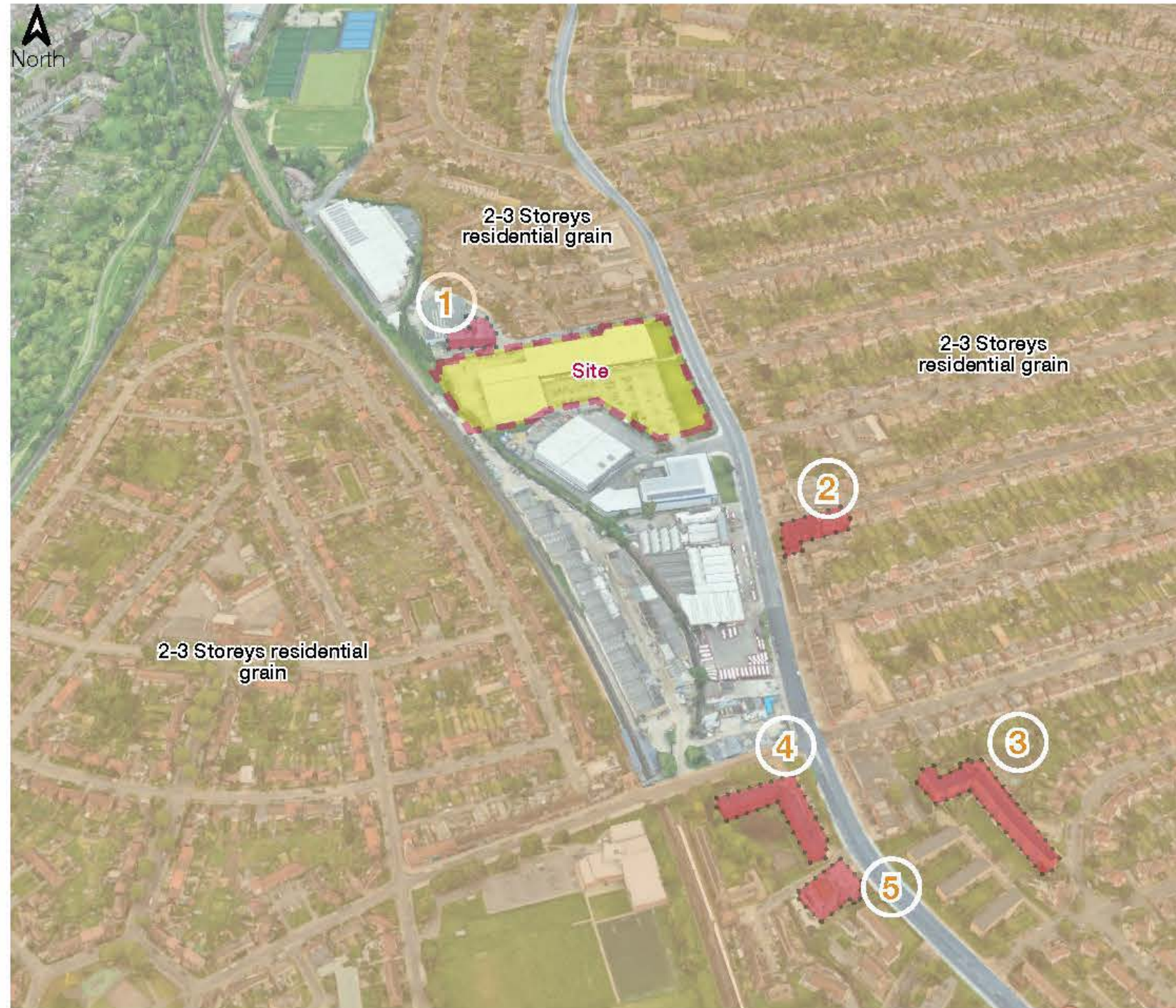


## Urban grain and land uses



Site surrounded with industrial, residential, public parks and schools.

# Context heights



**Catford Police Depot**  
4 storey



**Residential**  
3 storey



**1-65, 66-77, 78-89, 90-101 Bromley Road**  
5 storey



**Randisbourne Gardens**  
5 storey



**Delamare Court**  
6 storey

# Land designations & heritage



## Listed buildings

- 1 The Fellowship Inn Public House and attached hall
- 2 1-65, 66-77, 78-89, 90-101 Bromley Road
- 3 K2 Telephone Kiosk Corner

## Further planning designations and site considerations:

Archaeological Priority Area, Air Quality Management Area, Flood Zone 2, Critical Drainage Area.



-  Strategic Industrial Location
-  Grade II Listed Buildings
-  Conservation Areas
-  Site



# Planning policy context

# LEWISHAM LOCAL PLAN

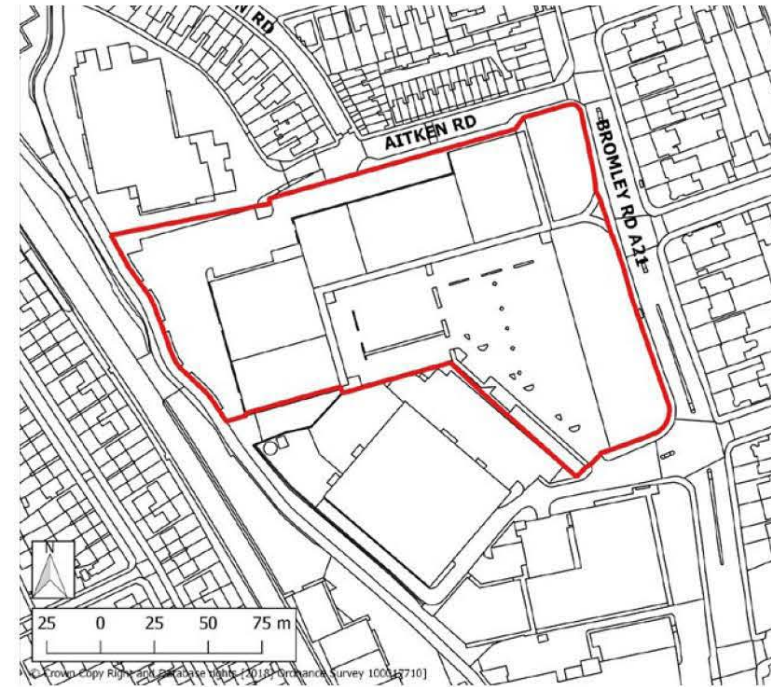
An Open Lewisham as part of an Open London

Proposed submission document – Regulation 19 stage

January 2023



## 22 Ravensbourne Retail Park



### Site allocation

Comprehensive mixed-use redevelopment of existing out-of-centre retail park comprising compatible residential, main town centre and commercial uses. Public realm and environmental enhancements including new public open space and river restoration.

### Opportunities

The site is located on Bromley Road which forms part of the A21 corridor. It is currently occupied by an out-of-centre retail park consisting of large format retail buildings and car parking. The River Ravensbourne runs along the site's western boundary. Comprehensive redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal use of land. Rationalising of the retail offer will support the long-term vitality and viability of Catford major town centre, which is located nearby. Re-development will also enable public realm enhancements, including river restoration works and improved access to the River Ravensbourne.

### 14.121 Development requirements

1. Development proposals must be delivered in accordance with the A21 Development Framework.
2. The site must be re-integrated with the surrounding street network to improve access and permeability into and through the site. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors, with direct walking and cycle access to a riverside amenity space.
3. Positive frontages along Bromley Road and Aitken Road.

4. Development must be designed to improve the ecological quality, carbon storage, flood storage and public amenity value of the River Ravensbourne, and seek to re-naturalise the river where feasible, taking into account the River Corridor Improvement Plan SPD.
5. Delivery of new and improved public realm in accordance with a site-wide public realm strategy, including:
  - a. Provision of new public open and/or green space, linking to Aitken Road.
  - b. Public open space along the river.
  - c. Public realm enhancements along Bromley Road with the retention of the current green space and an improved walking and cycle environment.
5. Taller buildings that help with way finding along the A21 corridor may be acceptable, with development stepping up from Bromley Road. Taller elements should be positioned towards the centre of the site to manage and mitigate impacts on amenity, including overshadowing, on the surrounding residential areas.
6. Part of the site falls within the Culverley Green Conservation Area, which development must respond to positively.
7. Buffers between the adjoining employment sites will need to be introduced, and where they are existing, enhanced. These should include elements of green infrastructure wherever feasible.
8. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.
9. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.
10. Commercial uses that are compatible with existing and new residential properties will be supported in principle. All such provision should complement existing uses at the Bromley Road SIL to reinforce the local node of employment generating activity.
11. Where main town centre uses are incorporated these should not adversely impact on the town centre network. Development will be expected to achieve a significant reduction in the current amount of retail floorspace, with replacement retail provision focussed on servicing the site and its immediate surrounds.

### 14.122 Development guidelines

1. Development should clearly define the edge of the A21 corridor with a well-integrated building line, including by extending the established building line to the north.
2. Development should improve opportunities for walking, cycling and other active travel modes, contributing to the A21 Healthy Streets Corridor. Development should not result in a reduction in existing footway or carriageway space.
3. A positive frontage should be established along the south side of Aitken Road to create a 'two-sided' street which relates sympathetically to the properties to the north.
4. Development should be designed so that primary vehicular access is from the A21 and Aitken Road. Opportunities should be explored to align the street network with Barmeston Road to create a contiguous layout, where this would help to improve circulation and not adversely impact on local amenity.

<b>SITE ADDRESS</b>	134 Bromley Rd, Bromley, London, SE6 2QU				
<b>SITE DETAILS</b>	<b>Site size (ha)</b> 2.46	<b>Setting</b> Central	<b>PTAL</b> 2015: 4 2021: 4 2031: 4	<b>Ownership</b> Private	<b>Current use</b> Out of centre retail
<b>HOW SITE WAS IDENTIFIED</b>	Call for Site (2015), London SHLAA (2017) and Strategic Planning Team (2019)				
<b>PLANNING DESIGNATIONS AND SITE CONSIDERATIONS</b>	Regeneration Node, Appropriate Location for Tall Buildings, Conservation Area, Archaeological Priority Area, adjacent to Strategic Industrial Land, Air Quality Management Area, Flood Zones 1,2,3, Groundwater Source Protection Zone 1, Critical Drainage Area, adjacent to Strategic Open Space, South East London Green Chain Walk				
<b>PLANNING STATUS</b>	Pre-application				
<b>TIMEFRAME FOR DELIVERY</b>	<b>Years 1-5</b> Yes	<b>Years 6-10</b> Yes	<b>Years 11-15</b>	<b>Beyond 15 years</b>	
<b>INDICATIVE DEVELOPMENT CAPACITY</b>	<b>Net residential units</b> 367		<b>Gross non-residential floorspace</b> Employment 7,749 Main town centre 1,937		



# A21 Development Framework

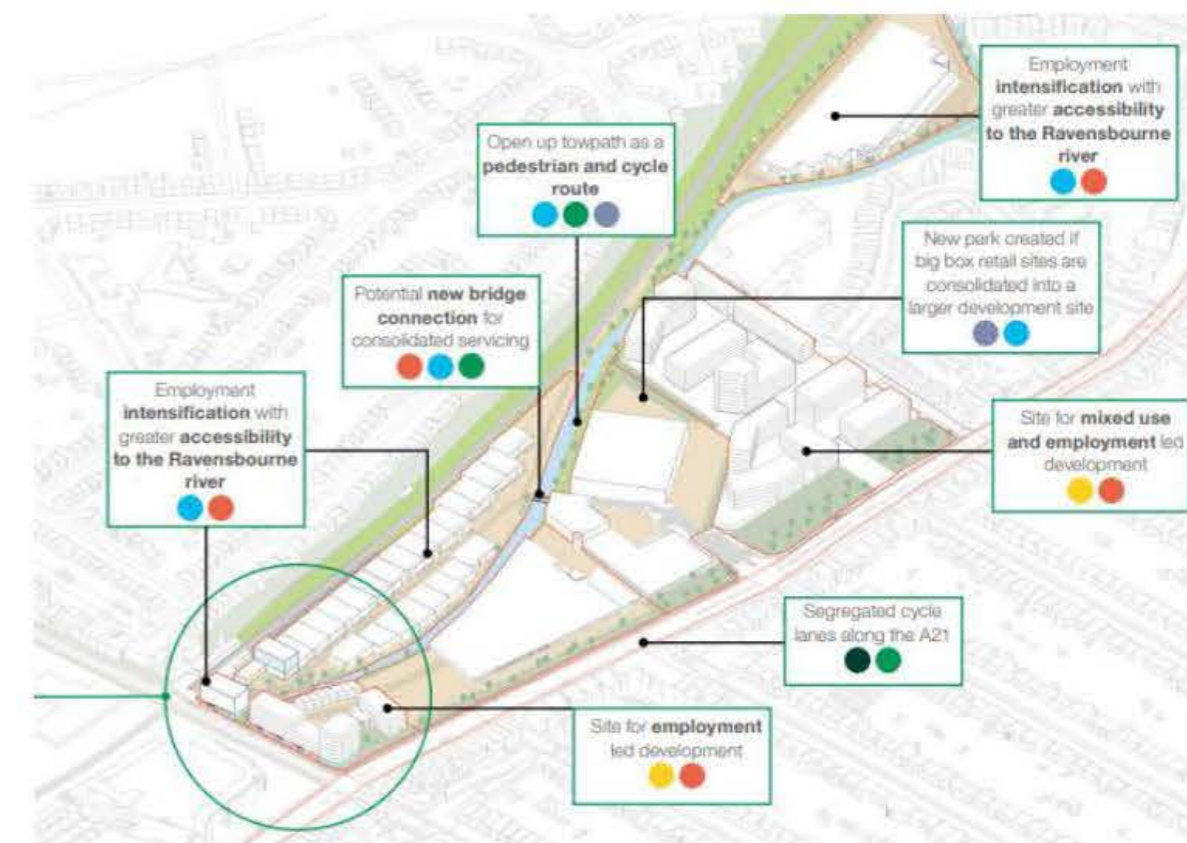


The A21 Development Framework Study Area

- Study area boundary
- Potential development sites



## Character Area Framework: Bellingham



# A21 Development Framework

## Site 9- Ravensbourne Retail Park



Fig. 1 Aerial site diagram

Site information (from Local Plan)	
Draft Local Plan site allocation	Lewisham Central Area Site allocation 18
Ownership	Private
Site area	2.46ha
PTAL	4
Indicative capacity	343 residential units 12,786m <sup>2</sup> non-residential floorspace
Planning designations and site considerations	Partially within Conservation Area; adjacent to SIL; Flood Zones 2, 3a, 3b
Current use	Out of centre retail
Character Area Framework	Bellingham Character Area Framework (from p. 47)

## Option A

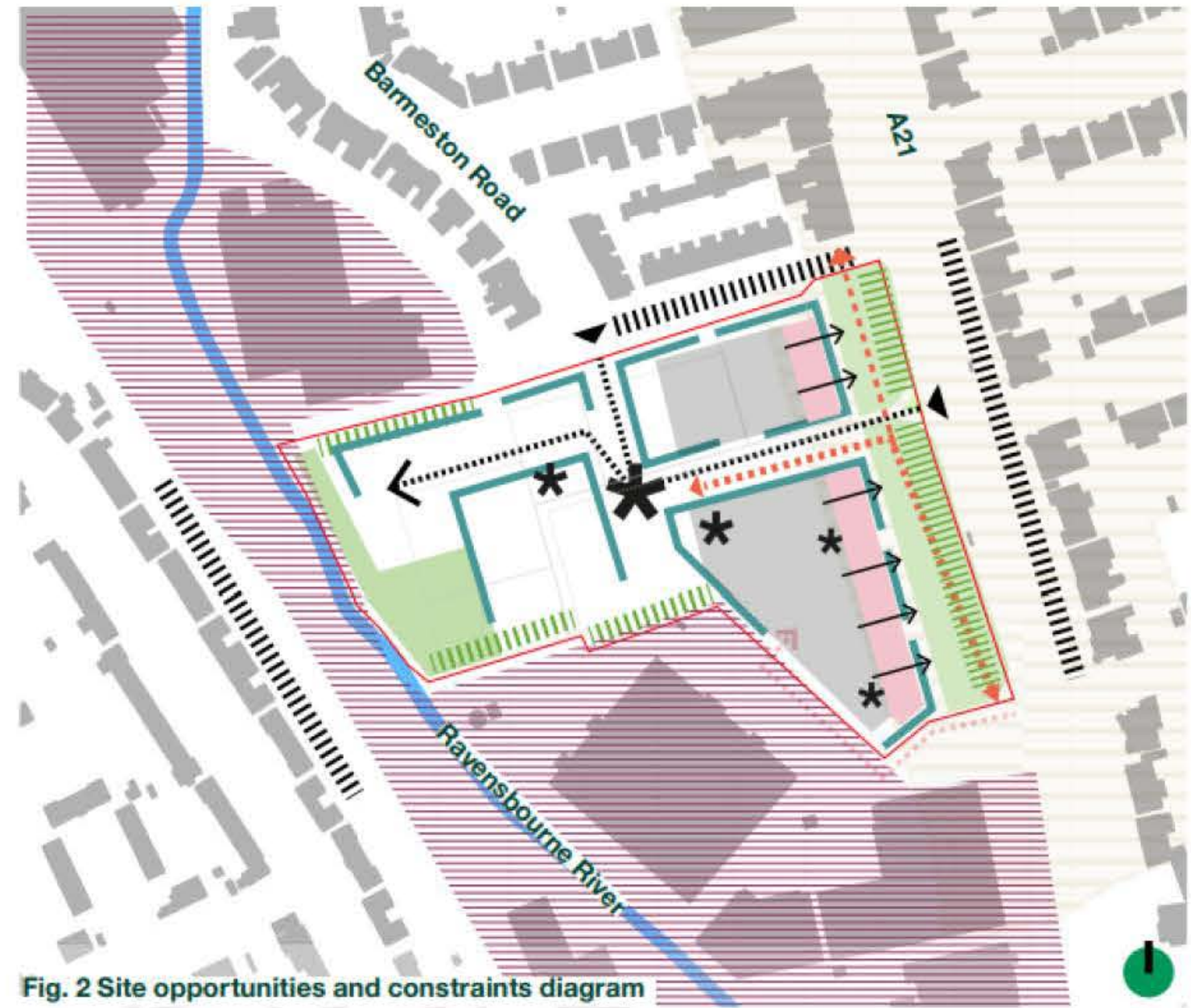


Fig. 2 Site opportunities and constraints diagram

### KEY PRINCIPLES:

- Exploring co-location opportunities to provide employment space while maximising residential capacity of the area
- Opening up a new link to the river
- Improve open space as amenity space for residents and new mixed use frontage
- Test bringing the A21 building line frontage closer to the A21 to increase activation of the street and the visibility of any commercial units within the frontage from the street. A wide green verge with trees should be retained within the site given the amenity and environmental value of the soft landscaping. Any loss of greenspace in this location could be replaced by new greenspace adjacent to the River Ravensbourne as part of a new pocket park.

KEY		Development Context	
Links	<ul style="list-style-type: none"> <li>- - - Potential to share existing retail park access to service micro-units</li> <li>--- New walking and cycle connection</li> </ul>	<ul style="list-style-type: none"> <li>■ New B1 uses with micro-units fronting onto open space</li> <li>■ Curvedley Green</li> <li>■ Conservation Area</li> <li>■ SIL area</li> <li>★ Taller building where impact on neighbouring properties is minimised</li> <li>□ Site boundary</li> </ul>	
Frontage	<ul style="list-style-type: none"> <li>--- New frontage</li> <li>--- Need for green buffer to adjacent noise/pollution source</li> <li>--- Sensitive edge</li> </ul>		

# A21 Development Framework

## Site 9- Ravensbourne Retail Park Option A

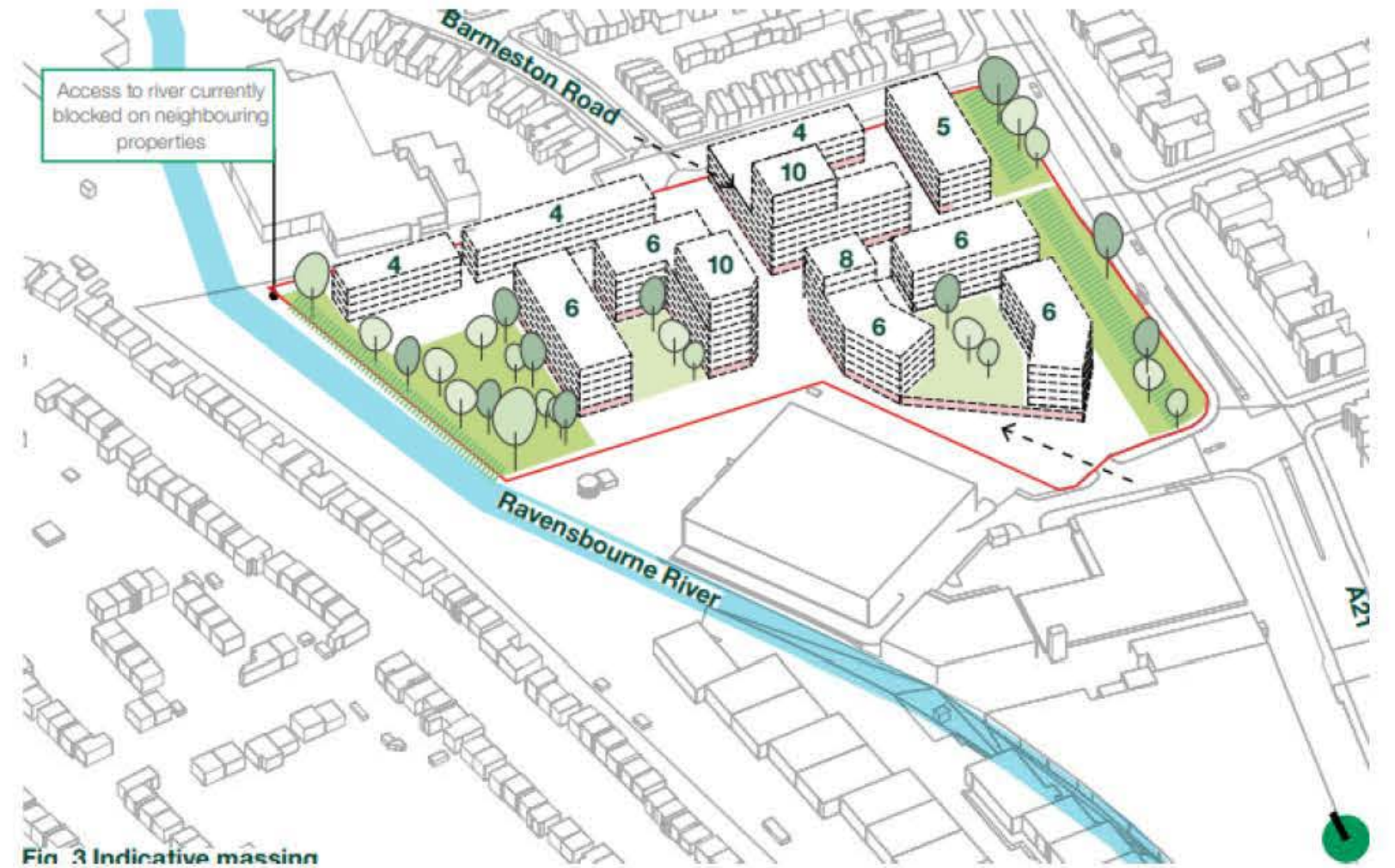


Fig. 3 Indicative massing

**Key:**

	1Bed 1Person		2Bed 4 Persons		Class E & F uses		Amenity space
	1Bed 2 Persons		3Bed 4 Persons		Forecourt		Disabled parking
	2Bed 3 Persons		3Bed 5 Persons		Public green space		Service access

Site capacity table

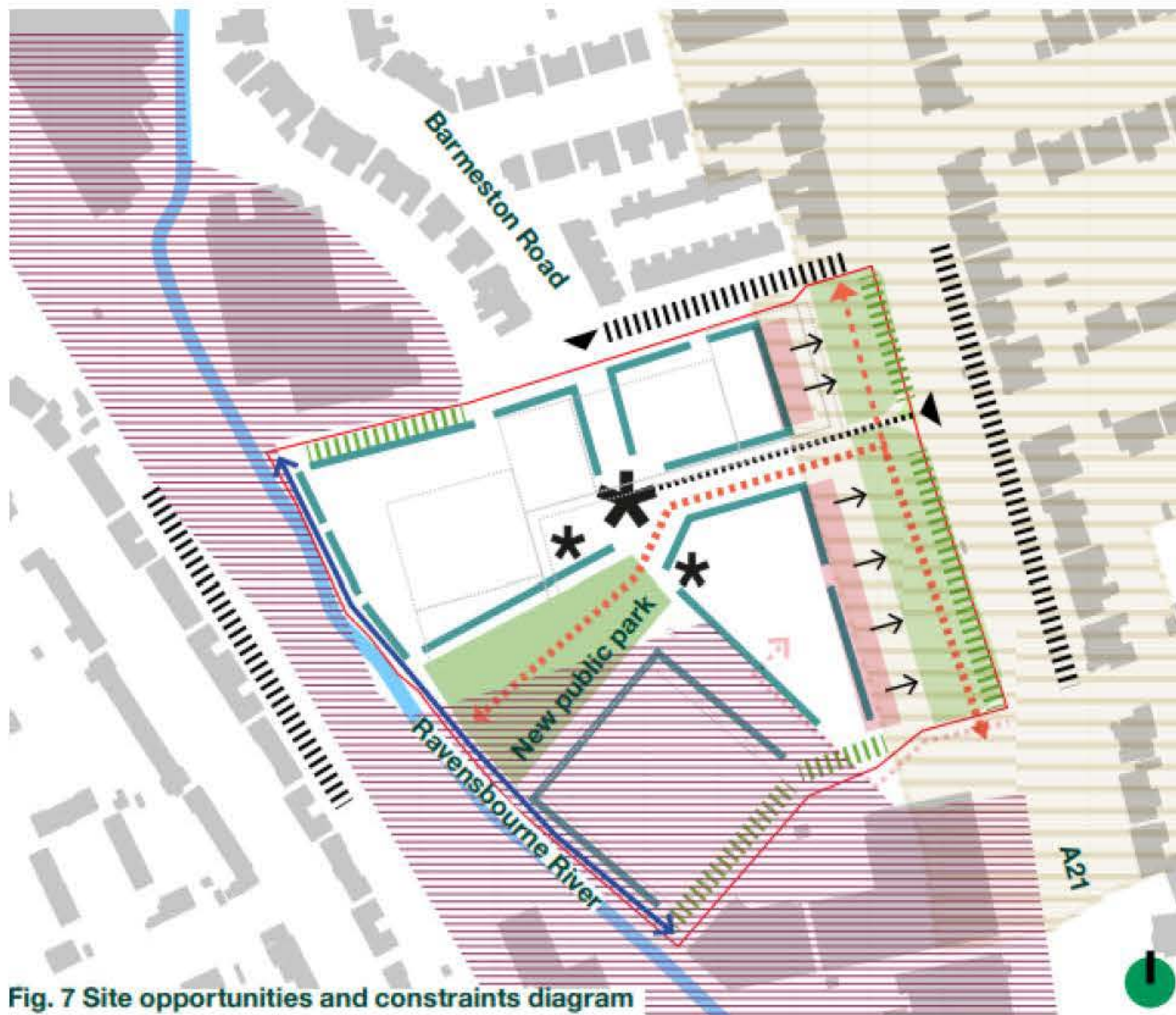
Unit Type	Number of units	% of total
1B2P	147	40%
2B3P	3	1%
2B4P	124	35%4
3B5P	95	26%
<b>Total</b>	<b>367</b>	
<b>Housing density</b>		<b>160 u/ha</b>
<b>Non-resi uses - floor area</b>		<b>1,500m2</b>

Assumptions:

- Maisonettes at ground and first level

# A21 Development Framework

## Site 9- Ravensbourne Retail Park Option B



### KEY PRINCIPLES:

- Opening up a new link to the river while providing new large green space for the neighbourhood
- Use network of green and blue space as a buffer from road and industrial estates
- Improve open space as amenity space for residents and new mixed use frontage
- Contrasting character; providing active frontages and employment space along the A21, building upon the river and green spaces and integrating with existing residential neighbourhood and industrial estates
- Test bringing the A21 building line frontage closer to the A21 to increase activation of the street and the visibility of any commercial units within the frontage from the street. A wide green verge with trees should be retained within the site given the amenity and environmental value of the soft landscaping. Any loss of greenspace in this location could be replaced by new greenspace adjacent to the River Ravensbourne as part of a new pocket park.

### Site capacity table

Unit Type	Number of units	% of total
1B2P	217	36%
2B3P	9	1%
2B4P	221	36%
3B5P	132	27%
<b>Total</b>	<b>607</b>	
<b>Housing density</b>		<b>193 u/ha</b>
<b>Non-resi uses - floor area</b>		<b>1,500m<sup>2</sup></b>

Fig. 7 Site opportunities and constraints diagram

KEY	
<b>Links</b>	<ul style="list-style-type: none"> <li>Potential to share existing retail park access to service micro-units</li> <li>New walking and cycle connection</li> <li>River path</li> </ul>
<b>Frontage</b>	<ul style="list-style-type: none"> <li>New frontage</li> <li>Need for green buffer to adjacent noise/pollution source</li> <li>Sensitive edge</li> </ul>
<b>Development Context</b>	<ul style="list-style-type: none"> <li>New B1 uses with micro-units fronting onto open space</li> <li>Culverley Green Conservation Area</li> <li>SI. area</li> <li>Taller building where impact on neighbouring properties is minimised</li> <li>Site boundary</li> </ul>



Fig. 8 Indicative massing

# Design and placemaking

Placemaking opportunities for the site

Public realm



Introduce new areas of open space

Pedestrian connectivity



Improve pedestrian movement through the site

Safety



Create active frontages

Housing



Deliver outstanding new homes

Employment



Create new job opportunities

River front



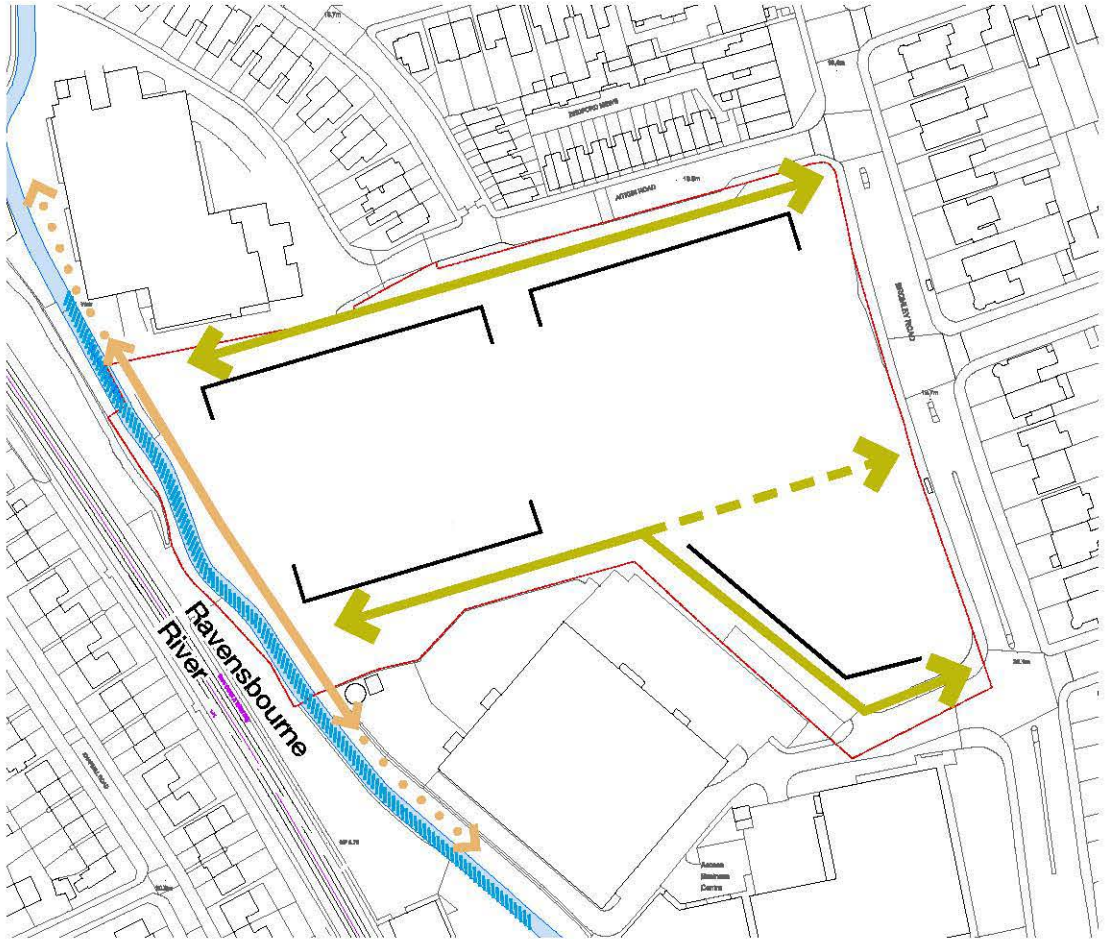
Open up the site to Ravensbourne river

# Design principles



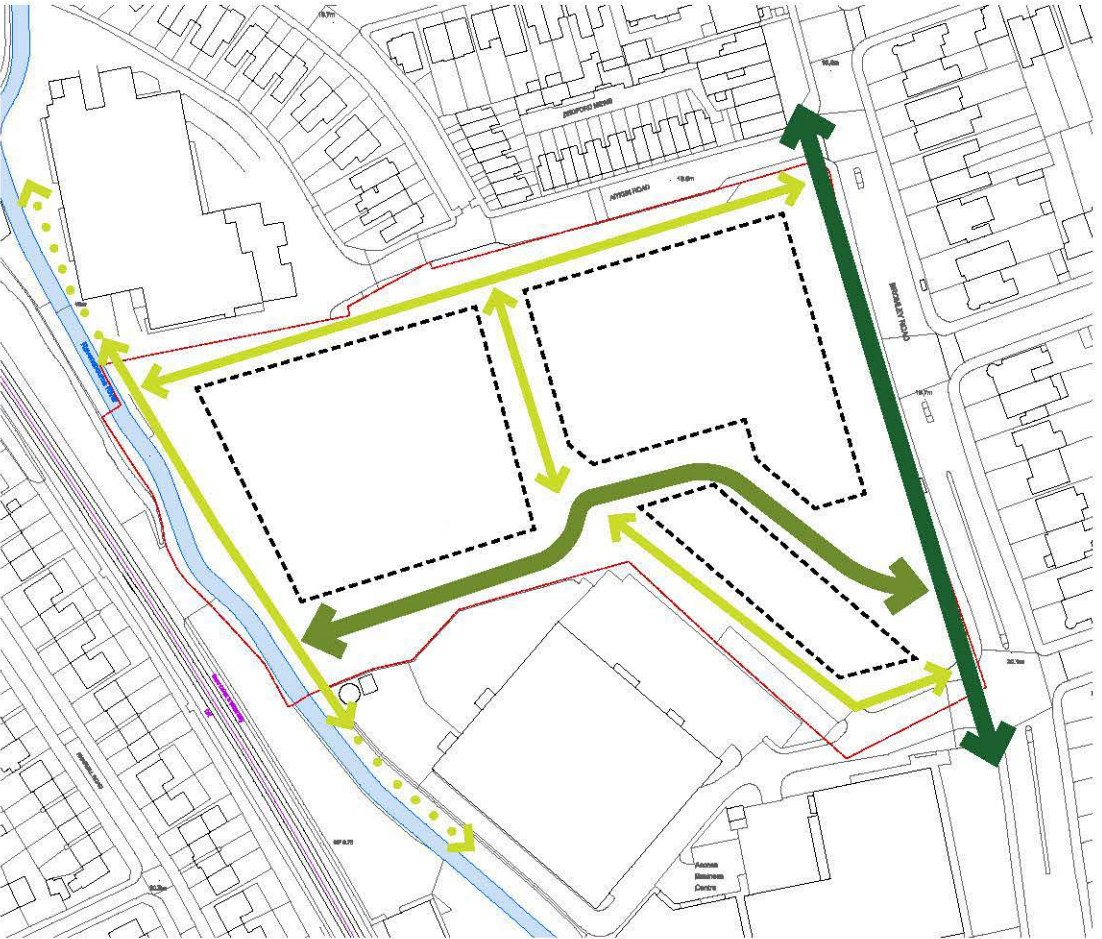
Response to Culverley Green Conservation Area : maximising the retention of existing green space and trees

- Retention of Culverley Green CA green space
- Pedestrian routes through retained green space
- Building frontage to define space and activate public realm



Creating an ecological corridor and allowing for a future connection along the Ravensbourne River

- Connections from Bromley Road to new river corridor
- Building frontage to define space and activate public realm



Improving existing pedestrian routes along Bromley Road and creating a hierarchy of legible routes through the site

- Primary pedestrian route along Bromley Road
- Secondary pedestrian route
- Tertiary pedestrian route
- Building frontage to define space and activate public realm

# Design principles



Creating a hierarchy of spaces of different characters to deliver a unique public realm offer



Masterplan framework of routes and open spaces to define three new building plots

- Trees
- Green open space
- Variety of surfacing material depending on use
- Pedestrian routes

■ Building plots on ground level



# Proposed masterplan: a variety of landscape spaces of different characters together with a range of building typologies

General arrangement - Roof plan



### Landscape settings

- ① New usable open space along Bromley Road - Maximising the retention of trees and open space
- ② New open space along the Ravensbourne River - Introducing new ecology and allowing for future connectivity
- ③ New green yard - An intimate public space
- ④ New east-west pedestrian route to the river corridor
- ⑤ New residential frontages along Aitken Road
- ⑥ Podium Gardens - Providing communal amenity for residents
- ⑦ Spine Road Northern Section - Providing access to the residential buildings and creating a new mixed use setting

### Building Typologies

- Ⓐ Mansion building
- Ⓑ Corner building
- Ⓒ Linear building

# Improving pedestrian connectivity and creating an urban frontage to Bromley Road



## Pedestrian movement across the site

- North-South routes
- East-West routes
- Key frontage

Ground floor design allowance for:

- 435sqm of town centre uses
- Up to 200 car parking spaces

# A variety of residential typologies to deliver high quality homes

Typical residential floor layout



**Residential capacity**

**Residential NIA**  
43,000 sqm

**No. of homes**  
680 homes

Proposed massing and heights



**Conclusion**

## River front



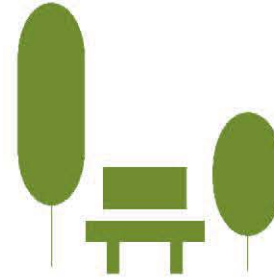
Opening up the site to Ravensbourne river

## Trees



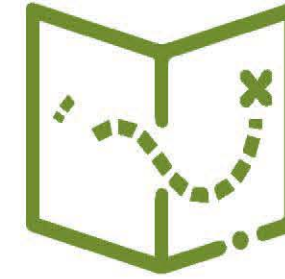
Maximising tree retention and new trees to be planted

## Public realm



A series of landscape character areas delivering amenity, play space, ecology and biodiversity

## Improving existing routes



Creating an animated and safer route along Bromley Road

## Creating new routes



Improve pedestrian movement through the site and creating new routes, including public realm along the river

## Conservation area



A contextual approach to scale and character to contribute to Culverley Green Conservation Area

## Employment



Contributing to the local economy and creating new job opportunities

## Housing



Creating much needed homes of outstanding quality, including affordable tenures

## Safety



Create a safe place, day and night, for the local community

## Sustainability



Creating a sustainable place

25 April 2023

Planning Service  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
London  
SE6 4RUSubmitted via email only to: [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

Dear Sir/Madam,

**LEWISHAM LOCAL PLAN  
CONSULTATION ON PROPOSED SUBMISSION DOCUMENT JANUARY 2023 (REGULATION 19)  
RAVENSBOURNE RETAIL PARK**

On behalf of our client, Royal London Mutual Insurance Society Limited ("RLMIS" / "Client"), we write to submit representations to the consultation on the Lewisham Local Plan Proposed Submission Document (Regulation 19) in relation to Ravensbourne Retail Park (the "Site"). These representations include a Proposed Site Capacity Document prepared by Patel Taylor Architects.

These representations are in support of Site Allocation 22: Ravensbourne Retail Park and we support the Site's inclusion in the final Local Plan once adopted for the reasons set out in this letter. Notwithstanding this, we consider that there are necessary amendments to the draft site allocation in order to ensure the soundness of the Local Plan.

**Background**

On behalf of RLMIS, Montagu Evans has been proactively engaged in the ongoing Local Plan making process. Detailed representations were submitted on 9 April 2021 in response to the Lewisham Local Plan 'Main Issues and Preferred Approaches document' (Regulation 18), within which the Site was subject to a draft allocation, "*Emerging Allocation - Lewisham Central Area 18: Ravensbourne Retail Park*" which proposed the residential-led, mixed-use redevelopment of the Site.

Representations were also submitted on 9 June 2022 by Montagu Evans in response to the consultation on the Lewisham Tall Buildings Study Addendum dated May 2022 with reference to this site.

This is a genuine development site that RLMIS is committed to bringing forward in the long-term to deliver a successful residential-led redevelopment. RLMIS have also been engaged in pre-application discussions with the Lewisham Planning and Regeneration Teams since 2021 to discuss options for the redevelopment of this Site. These representations are informed by the feedback that we have received during these pre-application discussions.

**The Site**

The Site is located circa 290m north of Bellingham Train Station. It falls outside the Bromley Road Strategic Industrial Land ("SIL") which is located adjacent to the north-western and southern boundaries. The Site also abuts residential development to the north-east, east and west. The Site itself covers an area of 2.71 hectares comprising units one to five of Ravensbourne Retail Park, along with the associated hardstanding car park. These units are currently in use for Retail and Leisure (Gym) purposes totalling 6,729 sqm (GIA), with the split outlined in Figure 1 below.

**Figure 1 – Split of Uses and Areas**

Unit		GIA (Sqft)	GIA (Sqm)
1	Wren Kitchens	14,994	1393
2	B&M Retail Ltd	17,481	1624
3	Tapi	9,937	923
4	Dunelm	20,010	1859
5	The Gym	10,012	930
<b>Total</b>		<b>72,434</b>	<b>6,729</b>

The Site is well connected, with good access to public transport, which is reflected by its PTAL rating of 4.

The buildings on Site are not listed nor is the Site located in close proximity to any listed buildings. A small section of the eastern part of the Site falls within the Culverley Green Conservation Area.

**Relevant Planning Policy Guidance**

The Lewisham A21 Development Framework is planning guidance document that was approved by Lewisham on 9 March 2022. Within the framework, the Site is identified as a potential development site within Bellingham Character Area “*Site 11 – Ravensbourne Retail Park*”. The framework contains two indicative capacity studies for the site, which are summarised below.

Option A

This includes the entirety of the Site and proposed:

- Buildings ranging from 4-10 storeys;
- 393 residential units;
- 1,500 sqm of non-residential floorspace; and
- 220 car parking space in total including 160 off-street spaces and 60 on-street spaces.

Option B

This includes the entirety of the Site and the builders merchants to the immediate south. This option proposed:

- Buildings ranging from 4-12 storeys;
- 619 residential units;
- 1,500 sqm of non-residential floorspace; and
- 290 car parking space in total including 200 off-street spaces and 90 on-street spaces.

The draft Local Plan Site 22 states that development proposals must be delivered in accordance with the A21 Development Framework. This is discussed in more detail below.

The A21 Development Framework indicative capacity studies for the Site are included at **Appendix 1**.

**Emerging Allocation - Lewisham Central Area Site Allocation 22: Ravensbourne Retail Park**

Principle of the Allocation

As explained above, the Site is subject to a draft allocation which these representations broadly support.

The allocation promotes the comprehensive, mixed-use development of the retail park comprising residential, main town centre and commercial uses. To support these uses, the allocation includes public realm and environmental enhancements, such as new public open space, landscaping and river restoration. RLMIS is supportive of the draft uses in principle, along with the aforementioned enhancements.

RLMIS is keen to ensure that its vision for the redevelopment of the Site is consistent with the objectives of the emerging allocation, as well as the wider borough and the GLA’s London Plan. Likewise, RLMIS supports the identification of the potential of the Site to deliver a significant quantum of new jobs and homes whilst having a positive impact on the surrounding area.

The allocation currently shows an indicative development capacity as follows:

- 367 net residential units;
- 7,749 sqm of employment floorspace; and
- 1,937 sqm of main town centre uses floorspace.



Whilst we are supportive of the emerging allocation and the principle of the uses proposed, the draft allocation proposes a significant quantum of employment floorspace (7,749 sqm). We are of the view that this draft quantum of employment floorspace does not align with national, regional and local objectives. In addition, such provision could undermine the capability of the Site to deliver a residential-led redevelopment and would compete directly with the adjacent Strategic Industrial Land which should be the priority location for new employment uses.

We are of the view that the Site should be optimised to provide a greater quantum of both market and affordable residential units. We explain this in greater detail below.

RLMIS has commissioned the architects, Patel Taylor, to undertake a massing and capacity study to establish the Site's residential redevelopment potential. This study demonstrates that the Site can comfortably deliver circa 680 residential units (circa 251 Dwellings Per Hectare), alongside up to approx. 500 sqm of town centre uses at the lower levels. The massing of this scheme has been informed by initial Sunlight/Daylight testing, along with analysis of the surrounding townscape and heritage constraints, neighbouring buildings and an assessment of the public realm and amenity space. Although we have not submitted these detailed studies as part of these representations, the Site Capacity Study prepared by Patel Taylor is included as part of these representations.

However, we will submit the detailed supporting information to Lewisham Planning Department shortly in or to arrange a pre-application meeting to continue our discussions on the proposals.

#### Town Centre Uses / Floorspace

We are supportive of the inclusion of town centres uses Within the draft allocation however as the Site is not located in a Town Centre, the indicative quantum of retail floorspace of 1,937 sqm should be reduced. The objective of the draft Local Plan, consistent with the NPPF and the London Plan, should be to maintain the vitality and viability of town centres by concentrating new town centres uses/floorspace to these locations to ensure out-of-centre development is not detrimental to the growth and function of town centres.

As such, rationalising the retail offer on the Site from the existing situation will support the long-term vitality and viability of Catford as a major town centre. An assessment of the local demand for retail floorspace has been undertaken by a specialist retail agency consultant and this supports a conclusion that up to 500 sqm of town centre uses would be the viable quantum of floorspace in this location.

In summary, we are supportive of the inclusion of town centre uses within the draft allocation however this should be reduced to 500 sqm as we feel this is more appropriate and would not undermine the viability of Catford Town Centre and would complement and support the wider residential-led redevelopment of the Site.

#### Employment Uses / Floorspace

As stated above, Site Allocation 22 identifies the Site as having an indicative development capacity to provide 7,749 sqm of employment floorspace / uses. We are not supportive of this draft allocation requirement for the reasons explained in more detail below.

Firstly, the economic market conditions have shifted significantly over the past 12 months in relation to delivering industrial and employment industrial uses on the Site. As a result of this, a residential-led redevelopment is the most viable and deliverable scheme that can come forward. We have also listened to the pre-application feedback received from the Council and the massing and capacity study prepared by Patel Taylor and submitted as part of these representations responds to the feedback received and current market conditions. In addition, draft Local Plan Policy EC2 (Protecting employment land and delivering new workspace) states that there is a forecast need for 21,800 sqm of net additional employment floorspace in the Borough up to 2038. Draft Policy EC2 states that new employment floorspace in the Borough should be delivered in accordance with the Lewisham Employment Land hierarchy, therefore industrial uses should be intensified within Strategic Industrial Land ('SIL') and Locally Significant Industrial Sites ('LSIS') and new commercial workspace maximised within Mixed-use Employment Locations ('MEL'). Successful delivery of the spatial strategy for the Borough is dependent on new employment development being directed to these locations, along with town centres.

Draft Local Plan EC7 (Mixed-use Employment Locations) states that comprehensive redevelopment of Mixed-use Employment Locations will be supported to facilitate their renewal and regeneration for commercial uses, prioritising new offices and light industrial space. There are eight designated MELs in the draft Local Plan:

- Arklow Road;
- Childers St Estate;
- Convoys Wharf;
- Grinstead Road;

- Oxestalls Road;
- Plough Way;
- Sun and Kent Wharf; and
- Surrey Canal Triangle.

While the Site is not located within a SIL, an LSIS, a MEL or a Town Centre, the draft Site Allocation has an indicative employment capacity of 7,749 sqm, which effectively equates to a third of the identified 21,800 sqm of net additional employment floorspace required. To successfully support the delivery of the spatial strategy and good growth within the Borough, we consider that the Site should not be required to provide any employment floorspace to ensure that new employment and industrial floorspace is concentrated toward designated employment locations. The provision of such a significant quantum of employment floorspace on the Site as part of any redevelopment would only serve to undermine the delivery and concentration of such uses within Borough employment areas, contrary to the strategic economic objectives of the NPPF, London Plan and the draft Local Plan employment policies.

In summary, as there is no evidence within the draft Local Plan evidence base to demonstrate a need for 7,749 sqm of employment floorspace from the Site and it is unjustified, we consider that this should be removed from the draft allocation to ensure the soundness of the Local Plan.

### Residential Development

As outlined above, we support the principle of residential development which has been included in the draft allocation for the Site. However, the Site should be further optimised to boost the supply of new homes consistent with the National Planning Policy Framework ('NPPF'), specifically the requirement for "...strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land" set out at Paragraph 119.

The Site is an exceptional residential location. It has excellent transport connectivity, local amenities and lack of competing development. Bellingham station is just a 6-minute walk from the site, with direct services to Central London in less than 30 minutes making it ideal for local working families.

Numerous public parks, schools and facilities are located nearby and the site already boasts an attractive green area separating the site from Bromley Road. The Ravensbourne River flows directly west of the site and residential redevelopment offers the opportunity to enhance the site's relationship to the river creating a valuable amenity for local residents. The surroundings are primarily residential and would make an ideal neighbourhood for a flourishing new community. New residents would also benefit from their proximity to the amenities of Catford town centre.

The scale of the site presents a compelling opportunity to deliver the first major scheme in Catford since the redevelopment of the former Greyhound Stadium.

Looking explicitly at housing delivery in the Borough, the most recently published Annual Monitoring Report ('AMR') 2021-2022 (December 2022) states that whilst Lewisham is currently able to demonstrate a Five Year Housing Land Supply (for the period 2022-23 to 2026-27) of 5.03 years (with a 5%) buffer, Lewisham acknowledge within the AMR that they will need to start planning for a 20% buffer in the near future due to the increasing challenge of meeting the identified housing delivery need. When a 20% buffer is applied, Lewisham can demonstrate 4.52 deliverable years.

Lewisham also acknowledge within the AMR that the sites anticipated to come forward for development in years 11-15 will not meet the housing requirement towards the latter end of the Local Plan period and that this situation will worsen if Lewisham does not start planning for a 20% buffer.

It is therefore evident that there is increasing pressure on Lewisham to deliver additional housing over the draft Local Plan period, especially in the context of the likelihood of applying a 20% buffer to the housing land supply.

Therefore, sustainable, previously developed sites should be maximised in order to meet the increased housing pressures in the borough and across London, consistent with the NPPF. This is outlined in London Plan Policy GG2 (Making the Best Use of Land) which promotes higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. This site meets all of these criteria.

Overall, we consider that there is a clear need for the draft allocation to further optimise the Site to maximise the quantum of market and affordable residential units that can be delivered, which in turn would help meet growing housing pressures. The massing and capacity study prepared by Patel Taylor and submitted as part of these representations demonstrates that circa 680 units can be comfortably delivered on the Site within an acceptable layout and massing.

Therefore, draft Site Allocation 22 should be amended to increase the indicative net residential capacity to 680 units.

### Car Parking

Consistent with the A21 Development Framework, any redevelopment of the Site should include on-site car parking provision for both the residential and non-residential uses. As such, we consider that the draft Site Allocation should be amended to include provision for up to 200 car parking spaces, which is broadly reflective of the quantum included within the A21 Framework development options.

### Building Heights

We support the inclusion of the Site within a 'Tall Building Suitability Zone' within the draft Local Plan and support building heights of 10-12 storeys on the Site as appropriate.

### **Summary**

These representations are submitted on behalf of RLMIS in respect of Ravensbourne Retail Park.

RLMIS believe this site has the potential to deliver a high-quality, residential-led redevelopment and are committed to delivering this in collaboration with the Council. As such, we are writing to support the draft Lewisham Central Area Allocation 20 in principle.

However as explained within this letter, we consider that the following amendments are required to the draft site allocation in order to ensure that it is justified, evidence-based and sound:

- The indicative town centre use capacity within the draft allocation should be revised to state 'up to 500 sqm of town centre uses';
- The indicative net residential capacity should be increased from 367 units to 680 units;
- The indicative employment capacity of 7,749 sqm should be removed from the draft allocation; and
- The draft Site Allocation should be amended to include provision for 200 car parking spaces.

By way of this letter, we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our Client. In the meantime, should you wish to discuss any of the above please do not hesitate to contact either Guy Bransbury ([guy.bransby@montagu-evans.co.uk](mailto:guy.bransby@montagu-evans.co.uk) / 07709 331 014) or James Huish ([james.huish@montagu-evans.co.uk](mailto:james.huish@montagu-evans.co.uk) / 07818 012 484) in the first instance.

Yours faithfully,



**Montagu Evans LLP**

Enclosure – A21 Development Framework Capacity Studies.

# APPENDIX 1.0

## A21 DEVELOPMENT FRAMEWORK CAPACITY STUDIES

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park

### Capacity study



Fig. 1 Aerial site diagram

Site information	
Draft Local Plan site allocation	Lewisham Central Area Site allocation 18
Ownership	Private
Site area	2.46ha
PTAL	4
Indicative capacity	343 residential units 12,786 non-residential floorspace
Planning designations and site considerations	Partially within Conservation Area; adjacent to SIL; Flood Zones 2, 3a, 3b
Current use	Out of centre retail
Character Area Framework	Bellingham Character Area Framework (from p. 47)

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option A Capacity study

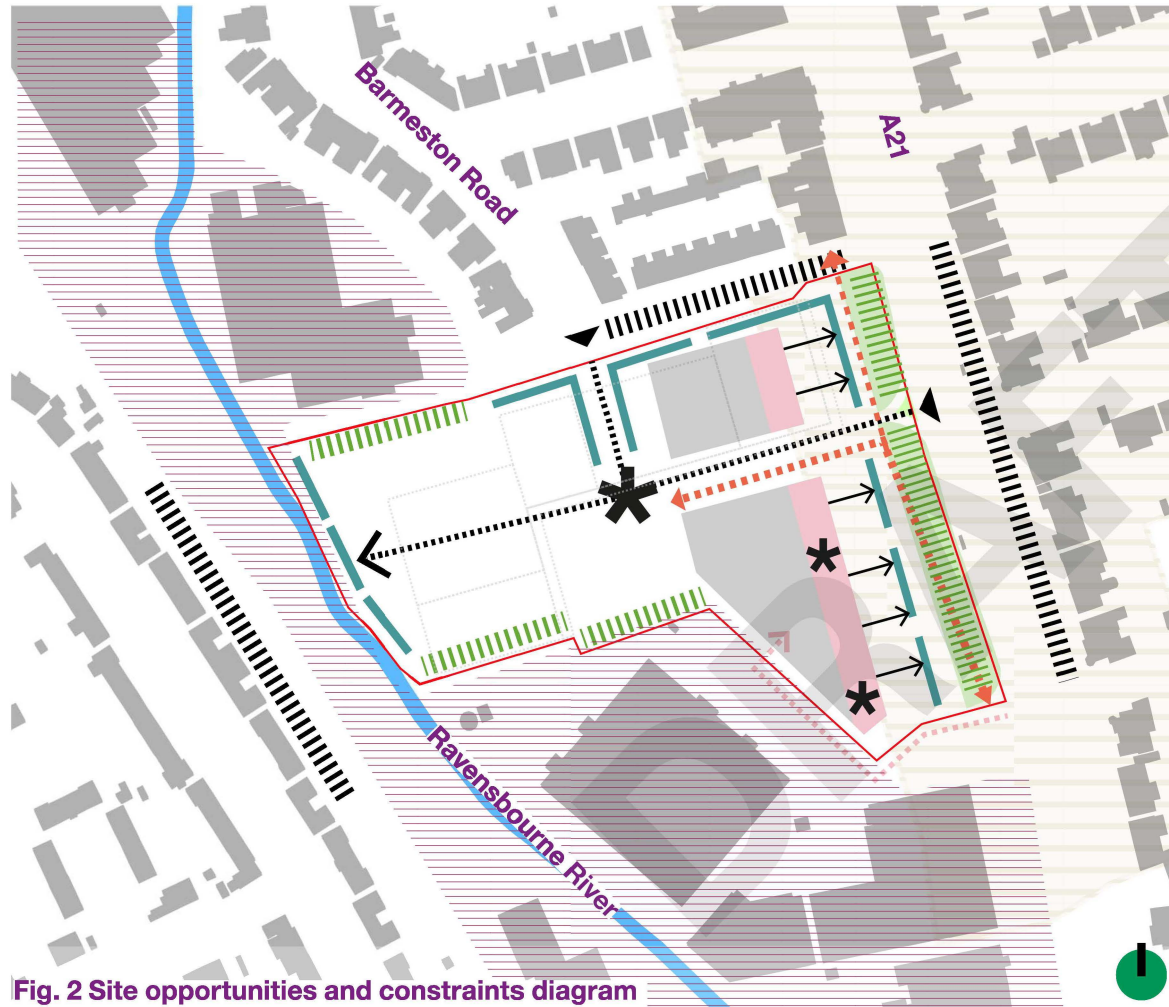


Fig. 2 Site opportunities and constraints diagram

- **Maximise the delivery of new homes to meet borough shortfall needs**
- **Promote sustainable modes of transport**  
Support better air quality and create an exemplary healthy street at scale
- **Increase tree planting and make the River Ravensbourne and other natural assets more accessible**  
Celebrate a rhythm of pause and intensity
- **Strengthen the distinctiveness of local centres, enhance the historic environment, and meet local employment and infrastructure needs**

### OVERALL PRINCIPLES:

- Exploring co-location opportunities to provide employment space while maximising residential capacity of the area
- Opening up a new link to the river
- Improve open space as amenity space for residents and new mixed use frontage

\*Above overall principles are for guidance purposes and it is a non-exhaustive list

### KEY

#### Links

- > Potential to share existing retail park access to service micro-units
- <--> New walking and cycle connection

#### Frontage

- New frontage
- ||| Need for green buffer to adjacent noise/ pollution source
- |||| Sensitive edge

#### Development Context

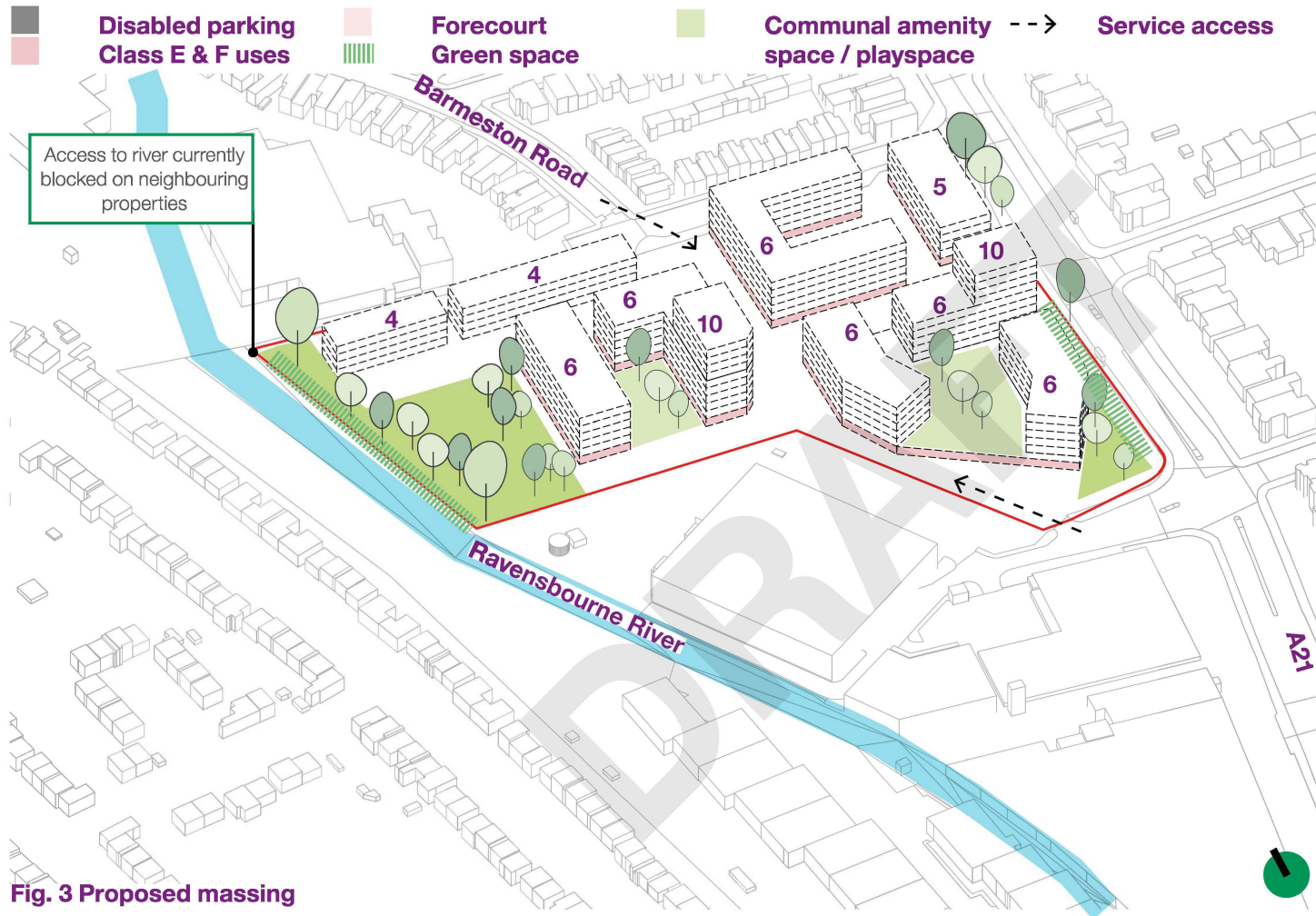
- New B1 uses with micro-units fronting onto open space
- Culverley Green Conservation Area
- SIL area
- \* Taller building where impact on neighbouring properties is minimised
- Site boundary

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option A

### Capacity study

**Key:**



**Relevant precedent**



**Fig. 4 Large scale site development at New South Quarter Development in Croydon**

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option A

### Capacity study



Fig. 5 Ground floor plan

### Site capacity table

Unit Type	Number of units	% of total
1B2P	159	40%
2B3P	3	1%
2B4P	136	35%
3B5P	95	24%
<b>Total</b>	<b>393</b>	
<b>Housing density</b>		<b>160 u/ha</b>
<b>Non-resi uses - floor area</b>		<b>1,500m<sup>2</sup></b>

### Assumptions:

- Maisonettes at ground and first level
- Parking on-street @ 0.15-0.2 = 60
- Parking in podiums approx. 160 spaces total
- Total approx. 220 = 0.4



# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option A

### Capacity study


- Key:**
-  1Bed 1Person
  -  2Bed 4 Persons
  -  Class E & F uses
  -  Amenity space
  -  1Bed 2 Persons
  -  3Bed 4 Persons
  -  Forecourt
  -  Disabled parking
  -  2Bed 3 Persons
  -  3Bed 5 Persons
  -  Public green space
  -  Service access



Fig. 6 Typical upper floor plan

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option B

### Capacity study

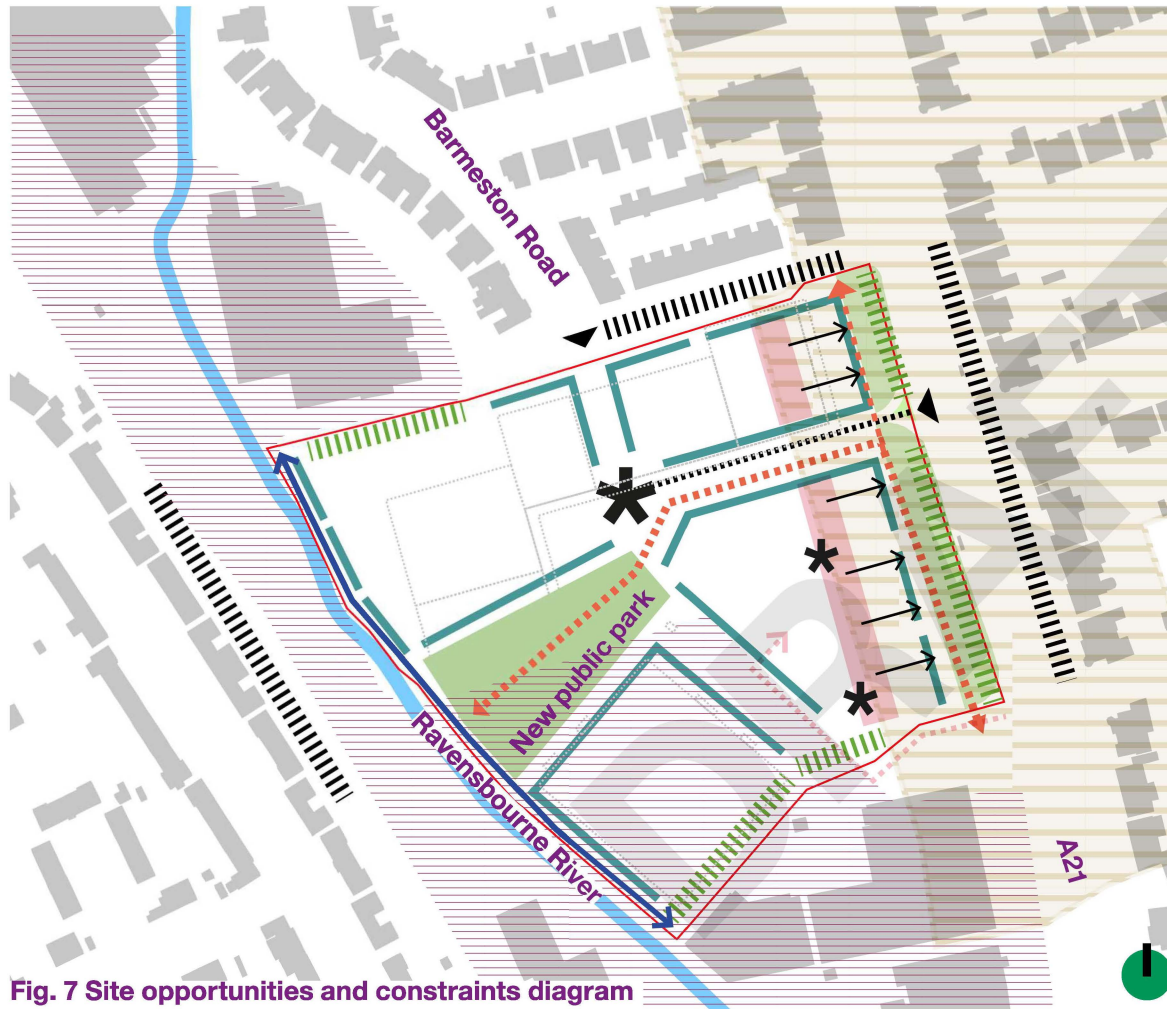


Fig. 7 Site opportunities and constraints diagram

- **Maximise the delivery of new homes to meet borough shortfall needs**
- **Strengthen the distinctiveness of local centres, enhance the historic environment, and meet local employment and infrastructure needs**

- **Promote sustainable modes of transport**
- **Support better air quality and create an exemplary healthy street at scale**

- **Increase tree planting and make the River Ravensbourne and other natural assets more accessible**
- **Celebrate a rhythm of pause and intensity**

#### OVERALL PRINCIPLES:

- **Opening up a new link to the river while providing new large green space for the neighbourhood**
- **Use network of green and blue space as a buffer from road and industrial estates**
- **Improve open space as amenity space for residents and new mixed use frontage**
- **Contrasting character: providing active frontages and employment space along the A21, building upon the river and green spaces and integrating with existing residential neighbourhood and industrial estates**

\*Above overall principles are for guidance purposes and it is a non-exhaustive list

#### KEY

##### Links

- > Potential to share existing retail park access to service micro-units
- > New walking and cycle connection
- > River path

##### Frontage

- New frontage
- Need for green buffer to adjacent noise/pollution source
- ||| Sensitive edge

##### Development Context

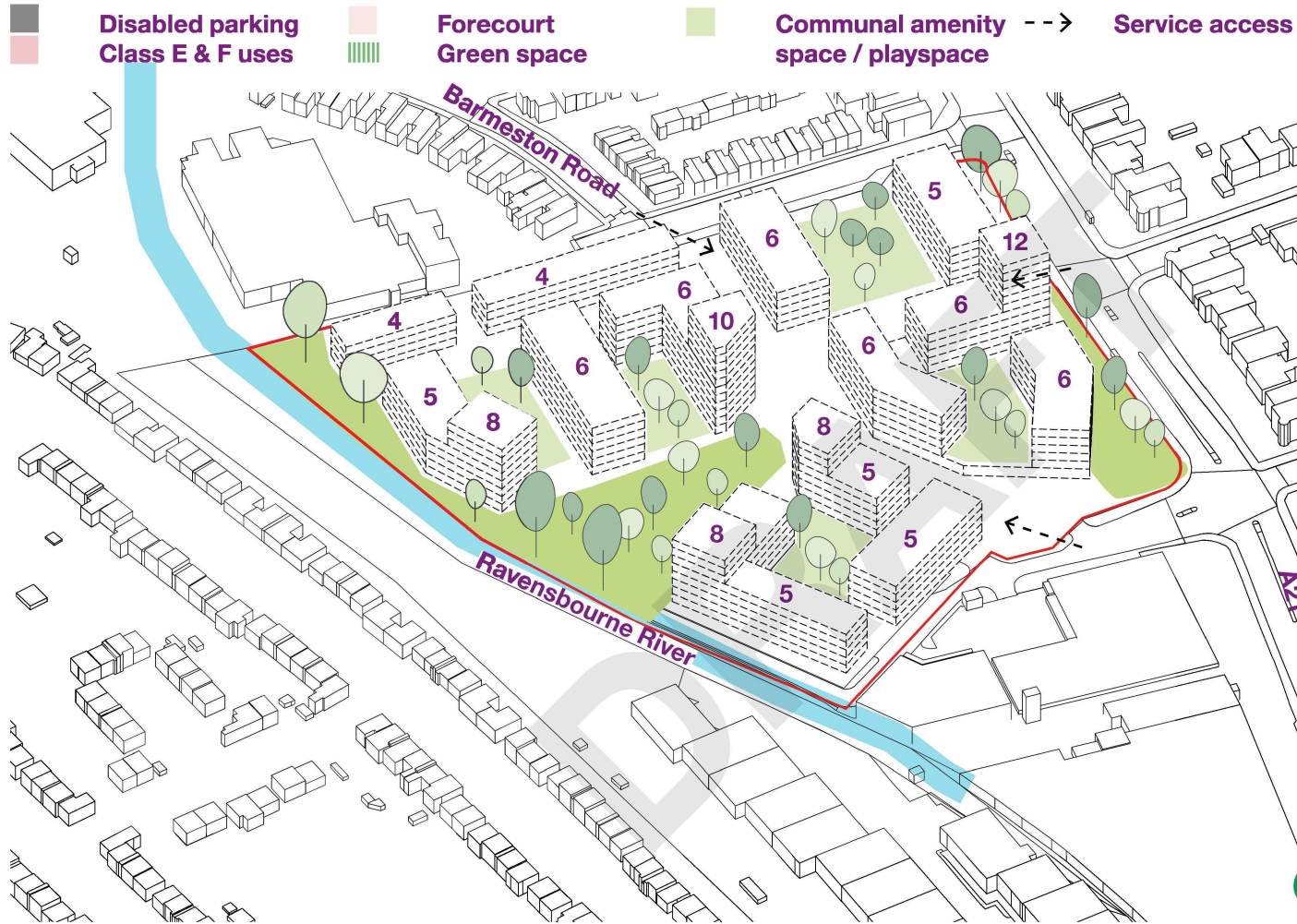
- New B1 uses with micro-units fronting onto open space
- Culverley Green Conservation Area
- SIL area
- \* Potential for height along A21 corridor
- \* Taller building where impact on neighbouring properties is minimised
- Site boundary

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option B

### Capacity study

**Key:**



**Fig. 8 Proposed massing**

**Relevant precedent**



**Fig. 9 Residential led development where by tall block facing the main road encloses lower density terrace at Prowse Court and Lord Graham Mews, London N18 2FF**

# Potential Development Sites: Bellingham Character Area

## Site 11 - Ravensbourne Retail Park - Option B

### Capacity study



Fig. 10 Ground floor plan

### Site capacity table

Unit Type	Number of units	% of total
1B2P	223	36%
2B3P	9	1%
2B4P	221	36%
3B5P	138	27%
<b>Total</b>	<b>619</b>	
<b>Housing density</b>		<b>193 u/ha</b>
<b>Non-resi uses - floor area</b>		<b>1,500m2</b>

### Assumptions:

- Maisonettes at ground and first level
- Parking on-street @ 0.15-0.2 = 90
- Parking in podiums approx. 200 spaces total
- Total approx. 290 = 0.48

Planning Service  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
London  
SE6 4RU

Date: 25<sup>th</sup> April 2023

Dear Sir or Madam,

## Representations to Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review.

On behalf of GHL (Leegate) Limited ('GHL'), Knight Frank hereby submit representations in respect of the Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review, which runs from 1<sup>st</sup> March 2023 to 25<sup>th</sup> April 2023.

The London Borough of Lewisham ('LBL') commenced the Local Plan Review in late 2015, with a consultation on the main issues for the Plan. LBL subsequently undertook a Regulation 18 Consultation in respect of the Main Issues and Preferred Approaches document (the Draft Local Plan), which ran from January to April 2021. It is understood that representations made to the Regulation 18 Consultation have informed the content of the Regulation 19 Local Plan Proposed Submission Document.

Formal representations were submitted on behalf of GHL to the Regulation 18 Consultation and they should be read in conjunction with this further representation. GHL also submitted representations to the Lewisham Tall Building Study Addendum Consultation that took place between May and June 2022, given the relevance this evidence-based document has in the context of GHL's land interest.

GHL maintain their strong support for the preparation of the Lewisham Local Plan Review and the identification of Leegate Shopping Centre, Lee Green, London, SE12 8SS (hereinafter 'the Site') as a site allocation for comprehensive redevelopment and this letter provides GHL's responses to the Regulation 19 Proposed Submission Document Consultation.

### GHL (Leegate) Limited

GHL has a major land interest within the borough through its ownership of the Site, which will be influenced by those policies and allocations contained within the Lewisham Local Plan Review.

The Site is currently allocated in the LBL Site Allocations Local Plan (2013) under ref. SA23 (Leegate Centre) for "*mixed use retail-led with housing, offices and hotel*". The timescales for delivery of development on Site is 2021 – 2026 and an indicative housing capacity of 130 dwellings is stated. However, the principle of a greater quantum of residential has been established through a 2015 resolution to grant planning permission (Ref. DC/14/090032) and a subsequent planning application for a higher-density residential-led scheme (Ref. DC/18/107468). Furthermore, the draft site allocation within the Regulation 19 Local Plan document recognises that the current allocation is now out of date and insufficient to optimise the Site's development potential.

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Your partners in property

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Regulated by RICS

Since acquiring the Site, GHL has reviewed the planning applications submitted by the previous site owner against the current and emerging development plan and undertaken a fresh Site appraisal to identify opportunities to optimise the Site's potential for a higher-density mixed-use scheme which can deliver an increased affordable housing offer alongside other public benefits, thereby making effective<sup>1</sup> and optimal<sup>2</sup> use of the brownfield and accessible site, in the Lee Green District Centre location, which is a key part of the overarching national, London and local strategy for delivery much needed additional homes in London.

GHL carried out extensive pre-application consultation with a number of stakeholders including LBL, GLA, RBG, TfL, Historic England, and the local community, from January 2021 to April 2022. The Proposed Development was also presented to LBL Design Review Panel ('DRP') on two separate occasions. Following the first DRP meeting, the Panel provided in principle support for the densification of the redevelopment proposals to deliver 35% affordable housing, subject to satisfactory resolution of massing, public realm, townscape, and other issues. Design changes were made following the first DRP and these were acknowledged to be positive at the second DRP meeting.

In May 2022, GHL submitted a full planning application to the LBL for the residential-led mixed-use redevelopment of Leegate Shopping Centre (Ref. DC/22/126997). The application was validated with the following description of development:

*"Demolition of existing buildings, and the construction of buildings up to 15-storeys (including basement level) to provide a comprehensive mixed use development including residential (Use Class C3), flexible commercial floorspace (Use Class E), a community centre (Use Class F2) and a public house (Sui Generis), together with associated public realm, landscaping and highways improvements, vehicular access, car parking and servicing arrangements, cycle parking and stores, and all other ancillary works."*

The planning application has been subject to the statutory consultation process and is now pending imminent determination, accordingly GHL continue to engage with Officers at LBL and the Greater London Authority ('GLA'). The GLA in its Stage 1 decision (dated 1st August 2022) "*strongly supported*" the proposed development residential density to include 563 homes. The GLA went on to note that the proposed residential-led redevelopment would include "*reprovision and optimisation of land uses that would contribute to the vitality and viability of the town centre*".

It is in this context that GHL submits this representation. GHL wishes to ensure that the Lewisham Local Plan Review, which will shape the future of the borough and more specifically the regeneration of the Leegate Shopping Centre and Lee Green District Centre, is robust, flexible, and capable of responding to future economic and demographic changes.

### Regulation 19 Proposed Submission Document

Paragraph 35 of the National Planning Policy Framework ('NPPF') (which the Local Plan will be considered against) requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:

- Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
- Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

If the Lewisham Local Plan Review fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Act 2004, is a legal requirement.

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<sup>1</sup> Paragraph 119 NPPF.

<sup>2</sup> Policy D3 and Good Growth Objective GG2 of the London Plan 2021

## **Part 1 – Planning for an Open Lewisham**

The Council sets out an overarching strategic objective for “*An Open Lewisham as Part of an Open London*” over the Plan period, which is then supported by nine themed topic areas. Within these nine themed areas, numerous objectives have been set out. For example, Strategic Objective B ‘Housing tailored to the community with genuinely affordable homes’ aims to: proactively respond to population growth and help to meet housing needs by positively managing the delivery of new homes; ensure residents benefit from good access to a wide range and mix of high quality housing; and foster community cohesion through the provision of housing that enables people to settle in the local area and remain rooted to it. Further, Strategic Objective 14 seeks to facilitate regeneration of localities within the London Plan Opportunity Areas and at key growth locations elsewhere, and also seeks to make the optimal use of land.

As with the Regulation 18 Consultation, the Spatial Strategy at Policy OL1 (Delivering an open Lewisham (Spatial Strategy) and Figure 3.3 sets out those locations to which new development and investment will be directed.

GHL agree with and acknowledges the importance of the abovementioned objectives and is well placed to support Lewisham in their delivery, at the Leegate Shopping Centre and elsewhere across the borough. GHL’s development proposals of Leegate Shopping Centre aligns with these objectives through the provision of 562no. residential units (173no. of which are affordable), including a significant number of family sized units (3+ bed). It should be noted that GHL’s May 2022 submission proposed 563no. residential units, however amendments were made to the proposed development in response to the Department of Levelling Up, Housing & Communities consultation on Fire Safety regulations, which resulted in the loss of one residential unit. The development proposals effectively reuse and optimise a highly sustainable previously developed brownfield site and assists with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre. GHL’s commitment to the delivery of the comprehensive redevelopment of the Leegate Shopping Centre directly supports the Council’s strategic objectives.

In response to Policy OL1 (Delivering an Open Lewisham), the designation of Growth Nodes within the areas to which new development will be directed is supported. Located within the Lee Green District Centre Growth Node, the development proposals of Leegate Shopping Centre would assist in delivering the Council’s strategic objectives and support Lewisham’s Spatial Strategy.

Overall, GHL supports the Council’s strategic objectives and Spatial Strategy, including the continued focus on making optimal use of land, responding to housing needs by positively managing the delivery of new homes, and prioritising the redevelopment of brownfield land for new housing.

## **Part 2 – Managing Development**

### High Quality Design

The Council continues to promote the delivery of high-quality design in Lewisham through a design-led approach (Policy QD1 Delivering high quality design in Lewisham), stating that development proposals must utilise a design-led approach to contribute to delivering high-quality, inclusive, safe, liveable and sustainable neighbourhoods in Lewisham. It further states that development proposals must be designed to facilitate good physical and mental health and should provide a high-quality public realm, positive and active frontages, and dedicated space and equipment for relaxation, social interaction and physical activity, and space for play. GHL continues to support the premise of Policy QD1 and remarks that these design principles are embedded into the development proposals for the Leegate Shopping Centre.

Policy QD4 (Building heights) and Figure 5.1 (Tall buildings suitability plan) set out areas where tall buildings are considered acceptable in-principle, in accordance with London Plan Policy D9 (Tall buildings). Policy QD4 Part C states that in Lee Green, buildings should not normally be more than 32.8 meters (10 storeys) to 39.2 meters (12 storeys). Part F states that tall buildings must be delivered through a masterplan process.

The Tall Building Review Background Paper (January 2023) considers ‘LG3 Sainsbury’s Site’ and ‘LG4 Post-war Leegate shopping parade + adjacent car park’ to be the only two locations in Lee Green that may be suitable for tall buildings, and limits the height to 12 storeys on both sites. It is noted that following consultation on the Tall Building Addendum and in discussion with the GLA, LBL Officers have reviewed the approach to identifying tall building suitability zones with a view to add a more granular design analysis.

Nonetheless, GHl take issue with the proposed maximum height threshold of 10 to 12 storeys within Lee Green. GHl note that a previous iteration of this policy contained in the Regulation 18 Consultation Regulation identified Leegate Shopping Centre as an area that is suitable for tall buildings. This was supported within the Draft Tall Building's Survey (March 2021), an evidence document, where the Site was acknowledged as being of medium suitability for tall buildings.

As remarked in GHl representations to the Lewisham Tall Building Study Addendum Consultation in June 2022, the height and massing for the Leegate Shopping Centre proposals has been subject to significant discussion and scrutiny during the pre-application stage. Architectural analysis and testing has involved discussions with several key stakeholders including LBL Planning, Design and Conservation Officers, LBL Design Review Panel, the GLA and Historic England. These discussions subsequently informed the design development, culminating in the development proposals submitted under planning application Ref. DC/22/126997. Throughout the pre-application process, it was confirmed that the development option comprising 15 storeys was preferable to that of 12 storeys – for example, within the Design Review Panel response letter it was stated *“the Panel were clear that from the apex local view, the 15 storey height is superior and more elegant”*.

As also stated within GHl's Lewisham Tall Building Study Addendum Consultation representations, the 'technical information' submitted as part of the planning application must be considered. The technical information provided within the planning application represents evidence that heights above 12 storeys at Leegate Shopping Centre are appropriate and can be accommodated. Therefore, GHl consider that the maximum height threshold of 12 storeys has not been sufficiently explained or justified.

GHl request clarification as to why the 'normal maximum height' in Lee Green has been reduced from 15 storeys in the September 2022 version of the Regulation 19 Proposed Submission Document to 12 storeys in the current (January 2023) version of the Regulation 19 Local Plan Proposed Submission Document, and why the technical analysis submitted as part of planning application Ref. DC/22/126997 has not been considered by LBL's policy team when determining tall building location height thresholds, despite being appraised and generally supported by development management and design teams at LBL for the determination of the live application. On this basis, GHl therefore request that the maximum height threshold of 12 storeys within Lee Green is removed. If a maximum height is considered necessary for such allocation, it is GHl's submission that it should be no less than 15 storeys with appropriate wording to provide sufficient flexibility for the detailed determination to be made by LBL when considering the application before them, with all site-specific technical information and townscape (HTVIA) analysis to support the tall building proposed. This would be in line with the approach set out in Policy D9 of the London Plan which looks at the acceptability of tall buildings (whether located in an identified location in the Local Plan or not) by assessing that building's visual, functional, environmental, and cumulative impacts. This type of site specific and detailed appraisal is much more proportionate, and outcome based. This work has already been done in respect of the proposals for the Site and is contained within planning application DC/22/126997. It would be remiss of LBL to not duly consider this as part of the underpinning evidence base for the tall building thresholds for the Site and would, ultimately, create an allocation which has: (a) not been positively prepared; (b) is unjustified (being unduly restrictive on the evidence before LBL); (c) is ineffective (creating inconsistency on strategic matters with the GLA and the London Plan's approach to tall buildings); and (d) inconsistent with the national planning framework (as it fetters the ability to make effective use of the land).

In addition, GHl do not consider it reasonable nor justified that *“tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, designed to a high quality standard and effectively managed over the lifetime of the development”* as proposed at Policy QD4 Part F. The policy states that the requirements for such masterplans are set out in Policy DM3 (Masterplans and comprehensive development). DM3 Part A states that development proposals must be accompanied by a site masterplan where they form all or part of a site allocation. Policy DM3 Part B requires masterplans to comprise of: an assessment of the site and its context; a detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and a delivery strategy that identifies how the development will be implemented and managed over its lifetime.

GHl agrees that tall buildings require detailed design scrutiny, as set by the London Plan policy requirements (paragraph 3.9.4). However, it is contended that it is possible to do so without engaging in a masterplan process. GHl engaged in a 14-month pre-application process which informed the submitted proposals. This included design and architectural analysis and testing which informed the design solution for the Site. The criteria set out in Policy DM3 Part B have been satisfied through the application process and submission documents, without necessitating a formal masterplan.



Policy QD7 (Amenity and agent of change) requires proposals to demonstrate how noise and other nuisances will be mitigated and managed, and states that proposals must comply with the agent of change principle in accordance with the London Plan. Part C sets out that development proposals must use the design-led approach to protect and wherever possible enhance amenity, by ensuring:

- a) Appropriate provision of privacy is made, ensuring development does not result in unreasonable levels of overlooking;
- b) Adequate provision for outlook, and demonstrate how this has been optimised;
- c) Adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate;
- d) New noise sensitive development is sited away from existing noise generating uses and activities, or where this is not possible, providing adequate separation and acoustic design measures;
- e) Green and open spaces are maintained as tranquil and quiet areas; and
- f) Development does not prejudice the use of playing fields.

Whilst GHL acknowledges the importance of safeguarding residential amenity, it must be recognised that development may result in some impact on the amenity of neighbouring properties, particularly in urban contexts; not least within areas where higher density development is actively encouraged. Throughout the application process, GHL has undertaken numerous assessments which considered the impacts of the development proposals on the amenity of neighbours and nearby sensitive receptors, and the suitability for future occupants. This included, for example, an Air Quality Assessment and a Daylight, Sunlight, Overshadowing, and Solar Glare Impact Assessment. Such assessments concluded that overall, the development proposal would not give rise to any severe or unreasonable impact on amenity and the impacts are considered to be acceptable within the context of the Site.

As such, Policy QD7 should be revised to take into account whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies contained within the Regulation 19 Proposed Submission Document.

#### Housing

The Lewisham strategic housing target is set by the London Plan. The London Plan stipulates a ten-year target of 16,670 net housing completions over the period 2019/20 to 2028/29 (London Plan Policy H1 Increasing housing supply).

GHL strongly supports the Council's strategy to make the best use of land and optimise site capacity (as stated within Policy HO1 (Meeting Lewisham's housing needs) Part A and Policy QD6 (Optimising site capacity)). We note that Lewisham's Centres, such as Lee Green District Centre, include several locations (including the Leegate Shopping Centre) where a significant number of homes could be delivered. These homes are in sustainable locations close to shops, services, amenities and public transport and should be supported. GHL welcome the Council's approach to site optimisation through a design-led approach, which reflects the Government's objective of "*significantly boosting the supply of homes*" (Paragraph 60 of the NPPF). GHL do however contend that imposing a maximum height threshold of 12 storeys on the Site would be at odds with the requirement for density to be optimised through the design-led approach; demonstrated through the evidence accompanying planning application Ref. DC/22/126997 which proposes buildings of up to 15 storeys.

Policy HO1 states that the Council will work positively and proactively with stakeholders to facilitate a significant increase in the delivery of new homes to help meet Lewisham's housing needs. Part E(c) references the need to secure provision of a mix of unit sizes to meet local need and part d states that a reasonable proportion of family units are to be delivered on major developments. GHL supports the acknowledgement within Part E of Policy HO1 that the appropriate mix should be established on a case-by-case basis having regard to the site's location and character. GHL acknowledges the need for a mix of house types, sizes and tenures to meet identified needs. However, it is important that those policies of the Regulation 19 Proposed Submission Document provide sufficient flexibility and avoid stifling the delivery of new homes as the result of overly prescriptive and restrictive policies.

#### Economy and Culture

Policy EC12 (Town centre network and hierarchy) promotes a town centre first approach. Part A states that development proposals must support and reinforce Lewisham's town centre network and hierarchy and part B confirms that a 'town centres first' approach will be used to assess development proposals for main town centre uses, in line with the London Plan and the NPPF. GHl supports this approach and indeed have sought to develop a scheme that will reinforce Lee Green's role within Lewisham's town centre hierarchy.

Policy EC13 (Optimising the use of town centre land and floorspace) adds that development proposals should optimise the use of land and floorspace within town centres by delivering new mixed-use schemes. GHl support this policy and are seeking to achieve this policy objective through the delivery of a high-quality residential-led mixed use development at Leegate Shopping Centre, which would contribute to the revitalisation of the Lee Green District Centre.

Policy EC14 (Major and District Centres) requires development proposals within Primary Shopping Areas for Class E and main town centre uses which do not contribute to the retail function at ground floor to submit a 'Shopping Area Impact Assessment'. This Statement is required to demonstrate that the proposed development will support the retail function of the Primary Shopping Area. Schedule 5 confirms includes the 'Leegate Centre' as a Primary Shopping Area. Furthermore, Part G states that proposals for residential uses on ground floor level or below, both within the Primary Shopping Areas and the wider town centre area, are inappropriate and will be strongly resisted.

The requirement for a 'Shopping Area Impact Assessment' limits future opportunity for Primary Shopping Areas and challenges the flexibility afforded by Class E. GHl are concerned that the Regulation 19 Proposed Submission Document focuses heavily on the retention and provision of traditional retail, which is at odds with the aspirations of the Government through the introduction of Use Class E, which aims to ensure the vitality and viability of high streets. It is worth noting, as an example, that there are currently high vacancy rates across Leegate Shopping Centre and in turn, much of this space is underutilised, of poor quality, and/or occupied on a part time basis. Furthermore, where units are occupied, there is a mix of uses including community, leisure and office use; not just traditional retail. A flexible approach to the Site is therefore required. The non-residential floorspace proposed within the planning application has been informed by a Commercial Market Evidence Report which demonstrates that the proposals reflect local market demand and can contribute positively to a thriving, active, and inclusive District Centre.

The requirement for a Shopping Area Impact Assessment would undermine the delivery of sustainable development and should therefore be removed.

GHl does not agree that residential units should be resisted at ground floor in Primary Shopping Areas and wider town centre areas. GHl is keen to see more residential delivered within Lee Green District Centre. Residential development performs an important role in securing long-term viability and vitality, by increasing its permanent population. It is considered non-residential floorspace which will have the highest chance of creating a successful place than providing a prescribed amount of floorspace that is not based on local market requirements or site characteristics and therefore unsustainable and/or unviable. The designation of 'Primary Shopping Area' should not wholly prohibit the delivery of residential development in these locations, particularly where it has been demonstrated that the location is appropriate for residential-led mixed-use development and supported by commercial evidence. GHl welcomes the continued emphasis placed on Lewisham's town, district and local centres as the focus for future development within the borough. However, it is strongly contended that the Primary Shopping Area designation is not justified. It is understood from the Policy that 'retail' focusses on traditional retail, with a particular effort to provide Class E(a), however, the existing Leegate Shopping Centre includes non-retail, commercial and community uses which, in the context of the proposed policy, would not be resisted within a Primary Shopping Area.

Policy EC19 (Public houses) sets out a presumption in favour of the retention of public houses in Lewisham, consistent with London Plan Policy HC7 (Protecting public houses). Part C states that development proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of a high-quality design and responds positively to local character. It is further stated that the development proposal should not result in a net reduction of floorspace unless this can be sufficiently justified. Supporting paragraph 8.111 adds that where sites are proposed to be redeveloped, including through comprehensive redevelopment, proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in-situ.

GHl recognises the need to protect public houses in London. However, it should be recognised that there will be instances where replacement or re-provision of a pub is necessary, and as long as the replacement facility is provided to ensure continued social, economic, or cultural viability and vitality will be retained, there should be no requirement to demonstrate that options have been considered to retain the pub in-situ. Nonetheless, the requirement to justify a net reduction of

floorspace is unduly onerous and does not afford commercial public house operators the ability to provide facilities that cater to local demand, and that are sufficiently flexible and commercially sustainable. GHL consider that the stated presumption in favour of retaining public houses is sufficient to achieve the policy objective, and the additional restriction on net loss of floorspace is unnecessary. As stated within the comments submitted to the Regulation 18 Consultation, clarification is sought on this approach.

### **Part 3 – Lewisham’s Neighbourhoods and Places (Lewisham’s East Area)**

GHG welcomes the key spatial objectives for Lewisham’s East Area, in particular the objective to “*re-establish Lee Green District Centre as a welcoming and thriving hub or commercial, cultural and community activity. Deliver public realm improvements together with high quality, mixed use developments through the renewal of Leegate Shopping Centre and other town centre sites.*”

Policy LEA1 (East area place principles) Part E states that the redevelopment and intensification of sites within the Lee Green District Centre will be supported where development proposals respond positively to local character. In addition, Policy LEA2 (Lee Green District Centre and surrounds) Part A states that development proposals must demonstrate how they will contribute to securing the long-term vitality and viability of Lee Green District centre, and Part E states that development proposals should be designed with positive frontages and active ground floor frontages within the town centre and its edges. Special attention should be given to design at the ground floor and podium levels of buildings.

GHG strongly supports the Council’s intention to identify and allocate sites to meet the increased needs within the borough. It is noted that the comprehensive redevelopment of sites such as Leegate Shopping Centre will form a central focus for the renewal and revitalisation of the District Centre. GHG strongly address that the comprehensive redevelopment of the Leegate Shopping Centre will significantly enhance the place qualities of the Centre whilst delivering new housing, improved retail provision and community facilities.

#### Site Allocation 3 – Leegate Shopping Centre

GHG strongly supports the continued allocation of the Leegate Shopping Centre for comprehensive, mixed-use redevelopment of the existing shopping centre, comprising a significant amount of new housing together with modern retail and employment space, leisure, community and cultural facilities, to support the town centre in the long-term.

It is noted that the indicative development capacity for the Site is circa. 450 residential units, 805sqm employment floorspace, and 5,449sqm main town centre uses, which has not changed since the Regulation 18 Consultation.

The development requirements at paragraph 16.28 remain broadly unchanged, but with the additional requirement regarding community infrastructure, citing “*provision of community infrastructure to meet demand arising from the development, including a new health facility in partnership with the CCG, NHS and other health bodies*”.

Additional development guidelines have also been included at paragraph 16.29, requiring development to take into account the Grade II listed fire station and the Old Tigers Head Pub in order to reinstate connections to Lee Green’s historic past, and requiring the Applicant to work in partnership with the Environment Agency and Thames Water.

NPPF paragraph 119 promotes the effective and efficient use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. NPPF paragraph 120 identifies that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

GHG supports the Government’s aspiration for the effective and efficient use of highly sustainable previously developed sites and the role that increased densification of urban sites will perform in protecting settlements beyond the boundary. Indeed, as set out within the NPPF, the Council should seek to achieve higher densities that take account of a range of factors. GHG encourages the Council to allow for greater densities within urban areas where appropriate, including within the Lee Green District Centre ‘Growth Node’. It should also be noted that in the Government’s draft NPPF (consultation version December 2022), the commitment to secure effective use of the land remains embedded at the heart of such draft. This demonstrates

the Government's continued intention and aspiration to promote effective and efficient use of land, especially in urban settings like the Site.

The Site's District Centre location means it is appropriate for high density residential development that optimises the number of homes delivered in the urban area, in the most sustainable location. The Site and other site allocations in the area can play a key role in achieving ambitious housing growth during the Plan period.

Therefore, it is contended that the proposed indicative development capacity and Council's aspirations on unit numbers, significantly underestimates the role that the Site could perform in meeting a variety of needs. We therefore again seek clarification on the Council's justification as to how the proposed development capacity has been determined. It is GHL's understanding that no technical feasibility studies have yet been undertaken by the Council to determine these indicative capacity figures.

The quantum of uses proposed within planning application Ref. DC/22/126997 have been informed by a design-led process, and pre-application discussions with LBL and the GLA to make the most effective use of the Site which will assist with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre. During this process, significant technical evidence has been submitted and scrutinised in order to justify the decisions made and obtain consensus. This approach is consistent with the London Plan Policy D3 (Optimising site capacity through the design-led approach) that requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.

Notwithstanding the indicative residential development capacity stated in the draft allocation, GHL is proposing to deliver an increased quantum of residential units which would make a significant contribution to the Council's housing and affordable housing targets. The proposed quantum of residential units has been informed by significant analysis and testing and extensive pre-application discussions. The application is supported by a suite of technical evidence which demonstrates that the Site is capable of delivering the proposed quantum.

Regarding the quantum of employment and main town centre floorspace, consideration must be given to the amount required to continue to support the vitality and viability of Lee Green District Centre. GHL's aspiration for the Site is to ensure that the proposed commercial uses and floorspace encourage investment to improve vibrancy and vitality and support the boroughs strategy policies and objectives for Lee Green. The balance and quantum of non-residential uses within the proposed development has been fully informed by market intel and research taking into account existing and future demand, comparable District Centres and redevelopment schemes and engagement with key stakeholders. It should be noted that the GLA in its Stage 1 decision (dated 1st August 2022) "*strongly supported*" the proposed development residential density to include 563 homes. The GLA went on to note that the proposed residential-led redevelopment would include "*reprovision and optimisation of land uses that would contribute to the vitality and viability of the town centre*".

Similar to the request made by GHL within the representations submitted to the Regulation 18 Consultation, it is requested that the proposed Leegate Shopping Centre site allocation is reviewed in the context of the submitted development proposals and is structured in a way that seeks the optimisation of site capacity through a design-led approach, and also ensures the quantum of commercial floorspace is appropriate and informed by evidence of demonstrable need.

The site allocation sets out that the timeframe for delivery is between 1-5 and 6-10 years. GHL support an anticipated timeframe of 1 – 5 years, noting that a decision on the submitted planning application is forthcoming and GHL estimate a construction period of approximately 4 years.

GHL appreciates the importance of the requirements and guidelines contained within the proposed site allocation and have thus made considerable effort to integrate these into the development proposals – for example, through delivery of new and improved public realm and provision of community infrastructure.

The proposed development includes space for the delivery of a new medical facility which is intended to be secured by a mechanism in any S106 Agreement. GHL has and continues to consult with the CCG, NHS and other health bodies regarding the delivery of this space. Notwithstanding, the prescriptive requirement of the site allocation to deliver such a facility has not been evidenced or justified by the Council and needs to be balanced against the real life consenting and approval process which a site (not just this Site but all sites proposing such a use) needs to go through in order to secure an NHS or health facility; ultimately whether or not the NHS (acting through the relevant CCG) wish to enter into a lease and operate a facility will be a matter for them and their relevant assessed needs, financial budgets for the location and time period in question

and a whole host of other influencing factors. It is noted that the Draft Infrastructure Delivery Plan ('IDP') (2022) references provision of a 'new health facility to meet needs of expanding and changing population for primary and community services' that is intended to sit within the new development in Lee Green. It does not, however, provide evidence of need or justification for such provision. It is understood that an Infrastructure Delivery Schedule ('IDS') is forthcoming, based on the findings on the IDP, which has been prepared in conjunction with correspondence with infrastructure providers and other stakeholders. When published, the IDP should provide more certainty on the demand for medical facilities in this area.

Furthermore, the reference to partnership with the CCG, NHS, and other health bodies is unduly onerous and unreasonable. GHL are not in control of the ability to ensure such opportunities / demand exists and can only seek to include these bodies in efforts to find an end user. The allocation must therefore retain flexibility to deliver a medical or health user under the relevant Use Class and not seek to impose additional controls or make the provision specific to any type of medical user. Furthermore, it should be noted that the provision of a medical facility within the development shall be addressed through the Section 106, on the basis of reasonable endeavours to identify demand from a wide range of medical users, including the CCG, NHS and other health bodies.

In summary, GHL welcome the allocation of the Leegate Shopping Centre for comprehensive mixed-use development. However, it is imperative that the site allocation is consistent with the submitted development proposals and reflective of the pre-application discussions undertaken with Lewisham in order to determine the most successful design solution for the Site. The prescriptive requirements (e.g. the requirement to deliver a health facility), should either be robustly justified, or removed and in either case expressed in a way which reflects the commercial realities at play (i.e. that securing an operator is outside of the control of the GHL notwithstanding using reasonable endeavours to do so).

## Conclusion

GHK support the preparation of the Lewisham Local Plan Review and continue to broadly agree with the objectives and aspirations set out within the Regulation 19 Proposed Submission Document. In particular, GHK support the Council's vision for the comprehensive redevelopment of the Leegate Shopping Centre. GHK do however have concerns regarding the site allocation indicative development capacities and the proposed 'normal maximum building height' of 10 – 12 storeys at Lee Green. Planning application Ref. DC/22/126997 clearly demonstrates that the Site is capable of delivering a greater quantum of development in accordance with the London Plan design-led approach to density and indeed Policy QD6 (Optimising site capacity) of the draft Local Plan. It is therefore submitted by GHK that:

- Site Allocation 3 – Leegate Shopping Centre: the 'normal maximum height' in the draft allocation for Lee Green should be no less than 15 storeys with appropriate wording to provide sufficient flexibility for the detailed determination to be made by LBL when considering the application before them, with all site specific technical information and townscape (HTVIA) analysis to support the tall building proposed;
- Site Allocation 3 – Leegate Shopping Centre: the indicative development capacity for the Site in the draft allocation (circa. 450 residential units, 805sqm employment floorspace, and 5,449sqm main town centre uses) significantly underestimates the role that the Site could perform in meeting a variety of needs and is inconsistent with the proposed application for the Site, and accordingly, such indicative development capacity should be recast to align with the proposed application which has been robustly tested and broadly supported by LBL and statutory consultees including the GLA;
- Site Allocation 3 – Leegate Shopping Centre: the quantum of employment floorspace should consider the amount required to continue to support the vitality and viability of Lee Green District Centre and be informed by evidence of demonstrable need.
- Site Allocation 3 – Leegate Shopping Centre: the requirement to deliver a health facility should either be robustly justified or removed but in either case expressed in a way which reflects the commercial realities at play (i.e., that securing an operator is outside of the control of the GHK notwithstanding using reasonable endeavours to do so);
- Policy QD4 Part C - The technical information provided with GHK's planning application provides evidence that heights above 12 storeys at Leegate Shopping Centre are appropriate and can be accommodated. As stated with Site Allocation 3 above, Policy QD4 Part C should be amended to reflect that the 'normal maximum height' should be no less than 15 storeys.

- Policy QD4 Part F - It is not reasonable nor justified that tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, designed to a high-quality standard and effectively managed over the lifetime of the development. It is submitted that this should be removed from the draft policy but if the principle is retained, the language must be recast to provide sufficient flexibility for tall buildings to come forward outside of masterplanning provided they are otherwise acceptable in all other planning terms (which is adequately enshrined in the remaining components of the draft plan, and too at national and London Plan level);
- Policy QD7 - This should be revised to consider whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies contained within the Local Plan Review;
- Policy DM3 (Masterplans and comprehensive development) – The criteria set out within Policy DM3 Part B can be satisfied through the planning application process and submission documents, without necessitating a formal masterplan. The requirement for proposals that form all or part of a site allocation should be removed.
- Policy EC14 (Major and District Centres) - The requirement for a Shopping Area Impact Assessment would undermine the delivery of sustainable development and should be removed.
- Policy EC14 Part G - The designation of 'Primary Shopping Area' should not wholly prohibit the delivery of residential development in these locations, particularly where it has been demonstrated that the location is appropriate for residential-led mixed-use development and supported by commercial evidence; and
- Policy EC19 (Public houses) Part C - this is unduly restrictive and contrary to intended purpose (i.e., retaining viable use and attracting public house operators) and wording to the effect of 'the development proposal should not result in a net reduction of public house floorspace' should be removed.

Given the sustained and detailed nature of discussions on the specific merits of the proposed regeneration of the Site, as discussed throughout this Representation Letter, it is important that this evidence based and collaboratively developed proposal can be delivered without being bound by unduly onerous and retrospective policy references in the draft Local Plan.

Should you have any queries or require further information at this stage, please contact Emma Gill ([Emma.Gill@knightfrank.com](mailto:Emma.Gill@knightfrank.com)) or Ellen Bailey ([Ellen.Bailey@knightfrank.com](mailto:Ellen.Bailey@knightfrank.com)).

Yours faithfully,



**Knight Frank LLP**

BJC/OW/JP/DP4204  
24<sup>th</sup> April 2023

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Dear Sir/Madam,

## **LONDON BOROUGH OF LEWISHAM LOCAL PLAN REGULATION 19 CONSULTATION CONVOYS WHARF**

On behalf of our client, Hutchison ('HPG'), please see our below response to the Lewisham Local Plan Regulation 19 consultation document.

By way of background, HPG has long term ownership of Convoys Wharf (the 'Site') and intends to develop the land in the short to medium term. The Site benefits from existing outline planning permission (ref. DC/13/083358) approved in March 2015 for the following description of development "*Demolition of all non-listed structures at the site, and comprehensive redevelopment (to include retention and refurbishment of the Grade II Listed Olympia Building) to provide up to 419,100 m<sup>2</sup> of mixed use development comprising up to: 321,000 m<sup>2</sup> residential (Class C3) (up to 3,500 units); 15,500 m<sup>2</sup> business space (Class B1/live/work units) and to include up to 2,200 m<sup>2</sup> for up to three energy centres; 32,200 m<sup>2</sup> working wharf and vessel moorings (Class B2 and sui generis); 27,070 m<sup>2</sup> hotel (Class C1); 5,810 m<sup>2</sup> retail, financial and professional services (Classes A1 and A2); 4,520 m<sup>2</sup> restaurant/cafes and drinking establishments (Classes A3 and A4); and, 13,000 m<sup>2</sup> community/non-residential institutions (Class D1 and D2), 1,840 car parking spaces, together with vehicular access and a river bus facility.*" This is known as the 'Consented scheme'.

The Consented scheme has been implemented and a number of the plots have come forward through Reserved Matters submissions. Works have commenced on Site at Plot 08, with P22 coming forward in the short term.

The Site is of strategic importance, and of London-wide significance. The Site is located within existing Strategic Site Allocation 2, allocated for mixed use development. The consented scheme is considered to meet the objectives of the adopted site allocation.

### **Review of Policy Topics**

HPG support the aspirations of draft Policy OL1: Delivering an Open Lewisham (spatial strategy), which sets out that good growth will be delivered by directing new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham's Opportunity Areas and carefully managing growth



in these locations in response to local character. The policy also confirms that good growth will be delivered by making the best use of land and space by prioritising the redevelopment of brownfield land of low or negligible ecological value. Convoys Wharf is a brownfield site, located within the Deptford Creek/Greenwich Riverside Opportunity Area and within a Regeneration Node, and therefore will contribute to the Borough's aspirations of securing good growth.

### **Car Parking**

The Site allocation confirms that the Site has a low PTAL rating of between 0-2, where 0 is the worst and 6b is the best.

Draft Policy TR4 acknowledges that *“development proposals for car-free development will be supported where they are located in highly accessible and well-connected locations. Elsewhere, car-free development will be supported where it can be suitably demonstrated that:*

- a. The development is appropriately located at a well-connected location with good walking and cycling access to local amenities and services; or*
- b. The development is appropriately located within an Opportunity Area, Growth Node, Regeneration Node, Growth Corridor or town centre where the Local Plan makes provision for significant public realm enhancements that will bring about attractive conditions for walking and cycling and improve access to local amenities and services; and*
- c. There is an existing Controlled Parking Zone (CPZ), or a future CPZ can be established through planning contributions;*
- d. There is sufficient capacity on the public transport network or potential for active travel interventions or implementation of Low Traffic Neighbourhoods in the local area to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure;”*

The Site is not currently in a well-connected location, and the PTAL of the Site is not expected to improve significantly by 2031 which highlights the need for car parking. It is acknowledged that new proposed bus routes and the introduction of transportation from the Thames will go some way to improve the accessibility of the Site, however this will not resolve the ongoing demand in the area for car parking. Therefore the site allocation should recognise the need for some level of car parking within the development to avoid pressure on on-street parking, or 'car-lite' in line with London Plan Policy T6. The consented scheme allows for the provision of 1,840 car parking spaces which is equivalent to 0.44 bays per unit which is considered appropriate in line with the current PTAL. It is therefore considered that the need for 'car-lite' schemes should be acknowledged within Policy TR4.

### **Mixed Use Employment Locations**

Convoys Wharf is identified as a 'Mixed-use Employment Location' (MEL) which is governed by draft Policy EC7. Part C of the policy confirms that where the comprehensive redevelopment of an MEL has been delivered through the Masterplan process all future proposals involving the redevelopment or change of use of land should retain and whenever possible seek to increase the proportion of industrial capacity across the MEL, as originally approved in the masterplan and planning consent. The policy also sets out that





proposals should also ensure there is no net loss of industrial capacity. Whilst the need to retain capacity is understood, it is considered that exceptions should be made where there is no longer demand for continued industrial floorspace in mixed-use employment locations.

### **Site Allocation 1: Convoys Wharf Mixed-Use Employment Location**

HPG support the aspiration set out in the draft Local Plan that comprehensive redevelopment of the site is integral to supporting regeneration in the Deptford area.

The proposed Site Allocation identifies an indicative development capacity for 3,500 net residential units. This reflects the approved position under the consented scheme. However, it is considered and has been agreed in pre-application discussions with both the GLA and the London Borough of Lewisham, that the Site can accommodate additional units. A drop-in application to extend the consented Masterplan is planned in the short term which will seek to accommodate c.600 additional units above the approved 3,500 units. Therefore, in order for the policy to be positively prepared, where opportunities are identified, the ability for further residential units to come forward should additionally be identified.

It is suggested that explanatory paragraph 15.24 is amended as follows:

*‘Convoys Wharf is a large brownfield site covering an area of more than 16 hectares, which is strategically located along the River Thames. In the 16<sup>th</sup> Century it was the Site of the Royal Naval Dockyard. The Site has been vacant for many years having last been used for industrial activities. Comprehensive redevelopment of the Site is integral to supporting regeneration in the Deptford area, with the creation of a new high quality mixed-use quarter that responds positively to its historical context. With the site’s prominent riverside location, and proximity to Deptford High Street, there is significant scope for transformational public realm and environmental enhancements. These will support the delivery of a new residential area and visitor destination that is well-integrated with its surrounding neighbourhoods and communities. There are further opportunities to increase the provision of residential units within the Site and to re-activate the safeguarded wharf that comprises part of the site, including for river based passenger transport.’*

### **Conclusion**

Our client, HPG, have been long term owners of the site and are committed to delivering high-quality development on the site. To enable this, HPG are keen to engage fully in the stages of adopting the new local plan and are keen to continue liaising with LBL to bring forward the Masterplan scheme and future proposals for the Site.

We trust that the enclosed information clearly highlights both the history and the opportunities for development present on the site. If you require any further information or have any queries, please do not hesitate to contact Barnaby Collins, Olivia Willsher or Jack Playford of this office.

Yours faithfully

*DP9 Ltd*

**DP9 Ltd**

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24<sup>th</sup> April 2023

Dear Sir / Madam,

## **London Borough of Lewisham Local Plan Regulation 19: Representations**

On behalf of our clients, Vision Construct Ltd and Evelyn Court (Deptford) LLP, we are writing to make representations in respect of the Regulation 19 Version of the Lewisham Local Plan ('the Draft Plan').

Both of my clients have an interest in the site known as Evelyn Court, Grinstead Road, London, SE8 5AD ('the Site'). Evelyn Court (Deptford) LLP is the site owner and Vision Construct are looking to redevelop the Site.

This Site is subject to a wider draft Site Allocation (No. 3) within the Draft Plan. The draft Site Allocation area is made up of Evelyn Court and the former Parker House site. As outlined above, Vision Develop will be looking to redevelop Evelyn Court (shown in red outline in Figure 1), The former Parker House site (shown in yellow outline in Figure 1) is owned by Lewisham Council ('The Council').



**Figure 1: The Site**

My clients have been in pre-application discussions with the London Borough of Lewisham regarding the redevelopment potential of the Site. They have also been speaking to the Council's Estates Department about the opportunity for a comprehensive scheme being

delivered between the Evelyn Court portion of the Site and Parker House.

My clients are supportive of the Draft Plan in principle and believe that it is positive that the Council is progressing a new Local Development Framework to help to shape development within the Borough.

Our comments on the relevant parts of the Draft Plan are set out below. These comments are considered in the context of the NPPF's 'tests of soundness'.

- **Policy QD4 and Figures 5.1 and 5.3** – we are supportive of this draft policy and these images which confirm that the Site is an Appropriate Location for a Tall Building and that within the sub-area that the Site is located in, up to 35 storeys would be permitted;
- **Policy HO1 Criteria (F)** – we consider that an additional exception criteria should be added for co-location sites, where an increased provision of family accommodation may not be appropriate if industrial uses and servicing are proposed at lower levels, below residential. We consider that this amendment will ensure that the draft Plan is Justified;
- **Policy E6 Part (E)** – we consider that this part of the policy should be written so that if any of the individual criterion (a) to (d) of this part of the policy are met then a net loss in industrial capacity is considered reasonable. This is on the basis that the threshold for meeting all criteria ((a) to (d)) is considered high. If full reprovision of industrial capacity is difficult to achieve on a specific site, it may render the scheme proposal unviable for redevelopment unless greater flexibility is allowed, namely demonstrating compliance with one of criteria (a) to (d) rather than all of them. We therefore consider that the word 'or' should be included after each criteria. We consider that this amendment will ensure that the draft Plan is Positively Prepared.
- **Policy EC2 and paragraph 8.10** – this Policy requires at least reprovision of the existing industrial capacity. This refers to the requirement to also consider demolished floorspace on vacant sites. We consider that this requirement may result in many schemes being undeliverable or having a significant reduction in other planning benefits. The London Plan defines Industrial floorspace capacity as "*either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio, whichever is the greater.*". We consider that this amendment will ensure that the draft Plan is Effective and consistent with the London Plan.

In terms of **Draft Site Allocation 3 (Evelyn Court at Surrey Canal Road Strategic Industrial Area)**, we are supportive of this draft Allocation in principle and it will help to bring a currently underutilised and unattractive site to deliver better quality employment floorspace and new homes.

We have the following more detailed comments on the draft Site Allocation:

- In terms of the Indicative Development Capacity we note that this is only an estimated capacity (102 homes and 2,381 sqm of employment floorspace). However, having undertaken pre-application work on the wider draft Site Allocation, we consider that an indicative provision should be 170 new homes and 1,800 sqm new commercial floorspace. The provision of 1,800 sqm would ensure the reprovision of the existing commercial floorspace on site. We consider that this amendment will ensure that the draft Plan is Effective; and
- Under 'Development Requirements', the draft Site Allocation states that: "*New and improved public realm in accordance with a site-wide public realm strategy, including improved connections between The Deptford Landings development at Oxestalls*

*Road, Deptford Park and along the route of the former Surrey Canal and to facilitate the delivery of Cycleway 4.*" The land along the route of the former Surrey Canal is not within the ownership of neither Evelyn Court (Deptford) LLP nor the Council. We therefore consider the part of this requirement underlined above is not reasonable and is not necessarily deliverable and should be removed. We consider that this amendment will ensure that the draft Plan is Justified.

We trust that the information submitted is helpful in informing the progress of the draft Plan. Should you have any queries in the meantime, please do not hesitate to contact me.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'RQ' with a flourish.

**Richard Quelch**  
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DP6013

25 April 2023

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Dear Sir/ Madam

## **LONDON BOROUGH OF LEWISHAM DRAFT LOCAL PLAN (REGULATION 19) CONSULTATION RESPONSE**

### **1. INTRODUCTION AND BACKGROUND**

On behalf of our client, Fosfel Apollo Limited (hereafter referred to as 'Fosfel Apollo' or the 'Client'), we write in response to the London Borough of Lewisham Local Plan Regulation 19 Consultation, which is open for comment between 1 March 2023 and 25 April 2023. Hurlington welcomes the opportunity to engage in this consultation that shall feed into the next stage of the Draft Local Plan review.

This letter sets out Fosfel Apollo's comments to the Regulation 19 Consultation. Due consideration has also been given to recent discussions with Planning Officers at the London Borough of Lewisham ('LBL') during pre-application discussions for the proposed redevelopment of the Apollo Business Centre, Trundley's Road, New Cross, SE8 5JE (hereafter referred to as the 'Site' or the 'Apollo Business Centre'). In February 2023, on behalf of our Client, DP9 submitted a full planning application at the Apollo Business Centre, for the following development (ref. DC/23/130258):

*"Mixed-use redevelopment of the site for a new building comprising part 10, part 26 storeys, including purpose built student accommodation and associated amenity space (Sui Generis), affordable residential (use class C3), light industrial use at ground and first floor levels (use class E(g)), retail / community use (use class E(a) / F1 / F2) at ground floor level, hard and soft landscaping, together with ancillary plant and servicing; and associated enabling works".*

The following representations are made in light of the above live planning application at the Site, balancing both our Client's interests and LBL's aspirations for its redevelopment. Reference is made to the emerging proposals at the Site where relevant.



## 2. SITE ALLOCATION 6 - APOLLO BUSINESS CENTRE

The Site is allocated within the Draft Local Plan under Site Allocation 6 ('Apollo Business Centre Locally Significant Industrial Site'). The redline boundary for Site Allocation 6 captures land under different ownership, including parcels of land that are both privately and publicly owned. The Site is allocated for the following:

*"Comprehensive employment-led redevelopment on this re-designated Locally Significant Industrial Site (LSIS)".*

The allocation identifies an indicative development capacity of 98 residential units and 3,396 sqm gross employment floorspace. The timeframe for delivery is estimated between 2028 – 2032. A copy of the site allocation can be found at **Appendix A**.

As part of the Draft Local Plan, LBL recognise that *"redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed-use quarter, together with Trundley's Road SIL and Neptune Wharf MEL sites"*.

LBL's development requirements are provided at Paragraph 15.51, including (but not limited to):

- Development must be delivered in accordance with a masterplan to ensure coordination in the co-location phasing and balance of uses across the site; and
- Development must not result in the net loss of industrial capacity, or compromise the function of the LSIS.

The draft site allocation provides a clear indication of LBL's vision and aspirations for the Site. It is considered that this is fully aligned with the development proposals for the redevelopment of the Apollo Business Centre, which is currently pending determination. Our Client is therefore supportive of the proposed site allocation and LBL's aspirations for the redevelopment of the Site.

Whilst our Client welcomes the allocation of the Site and its release from Strategic Industrial Land (SIL) and redesignation as a LSIS, it is noted that the revised indicative development capacity for the Site is not based on evidence and matters of fact, nor does it reflect its constraints and the existing floorspace on-site.

The Regulation 18 Draft Local Plan provided an indicative capacity of 59 net new residential units and 2,037 sqm employment floorspace, compared to the Regulation 19 Draft Local Plan which suggests capacity for 98 units and 3,396 sqm employment floorspace. From review of the Evidence Base submitted with the Regulation 19 Local Plan, the Integrated Impact Assessment (dated November 2022) does not appear to have appropriately assessed the Site. Paragraph 5.4.25 of the report states *"three sites are now at the pre-application stage and supported for notably different densities than anticipated within the Draft Plan, which serves to illustrate the challenge of making accurate assumptions in respect of development density at the Local Plan Stage"*. The report also notes at Paragraph 9.9.8 that the latest proposal, compared to the Draft Plan, involves 66% more housing and 66% more employment. However, there is no methodology or evidence base for the



percentages being stated, which demonstrates that the capacity of the Site is not based on robust evidence.

In light of the increased floorspace areas proposed as part of the Regulation 19 Draft Local Plan, Fosfel Apollo would strongly recommend that the Evidence Base is rigorously reviewed to accurately assess and determine the Site's development potential and provide robust evidence and justification for the increase in capacity. A rigorous methodology should be applied to ensure that the indicative development capacity is accurate, to provide a strong foundation and basis for future development proposals. The assessment should take into account the ability to deliver increased residential and commercial floorspace on-site, particularly in the context of the Site's irregular shape and access constraints, as well as restrictions based on land ownership.

Separate to the above, Paragraph 15.51 at Part 3 notes that there is an existing waste use at the Site (Southwark Metals). Development proposals are therefore required to address this use in accordance with Local Plan Policy SD12 and London Plan Policy SI9. The Site is currently occupied by Southwark Metals on a temporary basis, following their relocation from the Ruby Triangle (Old Kent Road), whilst they await their new permanent site in Thamesmead. The waste site is not a permitted use in planning terms, which is corroborated by the Greater London Authority's ('GLA') London Waste Map. Furthermore, Southwark Metals do not have a waste permit from the Environment Agency, and instead, is operating under an exemption.

Following a pre-application meeting with the GLA, Officers confirmed that they were satisfied that the current waste processing use at the Site is temporary and is not required to meet the Borough's waste processing capacity requirements. On this basis, the Apollo Business Centre does not qualify as a waste site in London Plan terms, requiring protection or compensatory provision as part of the Site's redevelopment. In light of the above, our Client requests that reference to an existing waste use is removed from Site Allocation 6 at Paragraph 15.51, Part 3, as there is no requirement to assess the proposals against the Draft Local Plan Policy SD12 and London Plan Policy SI9. The Site's existing permitted use is industrial use.

### 3. POLICY QD4 BUILDING HEIGHTS

Fosfel Apollo supports the inclusion of a prescriptive policy which dictates a range of acceptable building heights and locations where tall buildings are deemed suitable.

Draft Local Plan Policy QD4 defines tall buildings as those which are substantially taller than their surroundings and cause a significant change to the skyline. Within Lewisham, tall buildings are 10 storeys (or 32.8 metres measured from ground to the top of the building) or greater. Within locations identified as appropriate for tall buildings, the maximum height of the buildings should not normally be more than 96.8 metres (30 storeys) to 144.8 metres (45 storeys) in Deptford/ North Deptford. As part of the Draft Local Plan, the Site is identified as an 'Appropriate Location for a Tall Building' and is located in the Deptford / North Deptford area, in which maximum building heights are identified. Our Client is supportive of the proposed tall building allocation and the prescribed maximum building heights. The emerging scheme on-site has been developed in



line with this emerging policy and it has been ensured the proposals on-site sit within the maximum heights stated.

Our Client also agrees with the inclusion of a Tall Building Suitability Zone (see **Appendix B**), where tall buildings will only be permitted in identified locations within the plan. This ensures a coordinated approach which is both plan-led and design-led, to ensure appropriate densities across the Borough and maximise development opportunities to ensure that LBL's aspirations are fully realised and appropriate sites are optimised in line with London Plan Policy D3 and Policy D4.

The surrounding area is undergoing significant regeneration. Currently, there is a prominence of heights around Deptford Park and Folkestone Gardens. The emerging policy will ensure that tall buildings are brought forward in suitable locations and will secure exemplary design quality and safeguard the surrounding environment. On this basis, Fosfel Apollo does not propose any amendments to the current wording of Policy QD4 and is fully supportive of the current drafting.

#### 4. POLICY HO7 PURPOSE BUILT STUDENT ACCOMMODATION

The Draft Local Plan supports proposals for purpose-built student accommodation (PBSA) where it can be demonstrated that there is an identified need and the delivery of conventional housing will not be compromised. Policy notes it will also take into account the amount of PBSA within the Borough and the proportion of PBSA provided in relation to the overall mix of housing within a development. Our Client welcomes this approach, particularly given the demonstrable future demand and need for PBSA within the Borough at present.

The supporting text, at Paragraph 7.57, states that *"some 1,686 units were delivered and consented from 2016 to 2021, or an average of 337 per year...The London Plan sets out an overall target for London of 3,500 PBSA units per annum across all boroughs. In this context, Lewisham is making a significant contribution to meeting London's needs for PBSA. A carefully managed approach to additional capacity is therefore required. Development proposals must clearly demonstrate that the provision will not lead to a harmful overconcentration of PBSA"*.

The figures referred to above are sourced from Lewisham Strategic Housing Market Assessment (SHMA) 2022. Whilst the SHMA refers to the amount of PBSA that has come forward in the Borough over the last 5 years, there is no assessment or consideration of existing or future PBSA need within the Borough. In terms of future student need requirements, the SHMA appears to rely on the London Plan annual PBSA target. It is important to recognise that the London Plan target is not set by Borough, as the location of PBSA should be based on student need requirements, whom are increasingly locating in inner London Boroughs and commuting to Institutions.

A PBSA Demand Study, prepared by Savills, was submitted as part of the live planning application at the Site. The report states that there are currently 2,846 operational student beds in Lewisham and over 7,500 students, resulting in a bedroom to student ratio of 2:7. This is higher than surrounding Boroughs and demonstrates a supply imbalance. In terms of future pipeline, an estimated 836 beds will be delivered in Lewisham, which is not sufficient to bridge the gap





between demand and supply. Overall, it is considered that there is considerable and growing need for private PBSA that is well-connected to serve multiple universities. It is therefore considered that that statements made in paragraph 7.57 need to be reviewed and carefully considered given that within the Boroughs evidence base there has been no assessment or consideration of existing and future PBSA need.

In respect of nomination agreements, draft policy requires that *“the accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education provider(s)”*. It is considered that the policy wording should be amended to allow for greater flexibility on the quantum of student bedrooms that should be secured via a nomination agreement for occupation by students, as the current draft wording implies this is applicable to all student units, which would not meet London Plan policy requirements.

The provision of a high percentage of rooms via a nomination agreement can have an impact on scheme viability, given the sub-market values these units would achieve. This is particularly relevant to the live planning application at Apollo Business Centre, where a blended approach is being provided towards affordable housing, through the provision of conventional affordable housing and affordable student units to meet the 35% policy requirement. If a high percentage of student beds are secured via a nomination agreement (which drives a lower value per room), in addition to the quantum of affordable housing being provided (including conventional affordable), this would impact the financial viability and deliverability of the scheme. In light of this, it is considered there should be an element of flexibility within this element of the policy to allow for sites to be considered on a site-by-site basis. It is therefore suggested that the policy wording is amended to the following:

*“A portion of the accommodation is secured for use by students, as demonstrated by a legal agreement with one or more specific higher education provider(s)”*.

Further to the above, the proposed wording implies that for a scheme to be secured for student use, an agreement with a higher education provider is required. This fails to recognise that student housing can be secured for student use only via the planning permission itself and through management by a Student Housing Management Company. It is therefore suggested that the supporting text of policy H07 recognises there are alternative methods to ensuring student accommodation is secured for only student use. On other student schemes within the Borough, such as 164 - 196 Trundley's Road, the S106 has ensured that student accommodation is secured for student use via the requirement for the applicant to enter into a legally binding contract with a Student Housing Management Company or a Higher Education Provider. A Student Management Company essentially undertakes the role of a student accommodation provider on behalf of Education Institutions. Recognition of alternative methods to secure student housing allows flexibility to ensure the student accommodation can be delivered. It is our intention to secure wording to this effect should the proposals at Apollo Business Centre be successful.



## 5. POLICY EC6 LOCALLY SIGNIFICANT INDUSTRIAL SITES (LSIS)

Draft Local Plan Policy EC6 states that development proposals should ensure there is no net loss of industrial capacity within LSIS and seek to deliver net gains where possible. The co-location of employment and other compatible uses will be permitted at selected LSIS.

Fosfel Apollo welcomes the Site's release from SIL and re-designation to a LSIS as part of the Draft Local Plan. This release has formed part of a plan-led process and demonstrates a clear direction of travel for the Site. LBL have designated land at Bermondsey Dive-Under, informed by the wider Evidence Base, to provide substitute industrial capacity for the release of SIL at the Site. Under the emerging LSIS designation, co-location of employment and other compatible uses will be supported.

Overall, our Client supports the release of the Site from LSIS and the flexible approach to the co-location of compatible uses at selected LSIS (including the Apollo Business Centre) to secure the long-term viability of LSIS and facilitate renewal and regeneration.

## 6. POLICY EC4 LOW-COST AFFORDABLE WORKSPACE

The Draft Local Plan outlines Lewisham's aspiration to secure affordable workspace in commercial schemes. Policy EC4 requires 10% of rentable floorspace (Net Internal Area) in future commercial development for office and industrial to be provided as affordable (at 50% of market rent).

Whilst the importance of an affordable offer as part of new commercial developments is recognised, it is crucial that an element of flexibility is applied so as to not impact the viability of schemes and prejudice the delivery of development. It is therefore recommended that the policy is amended to reflect the scale of development, commercial floorspace thresholds and other site-specific considerations. The draft policy is inconsistent with adopted London Plan Policy E3, which recommends the introduction of affordable workspace policies in light of local evidence of need and viability, including policies on site-specific locations, rather than a blanket approach.

## 7. SOUNDNESS OF THE DRAFT LOCAL PLAN

The London Borough of Lewisham, through the current consultation, has posed questions on the soundness of the Draft Local Plan.

Fosfel Apollo considers that the Draft Local Plan is positively prepared and contains a clear and objectively assessed need for homes and employment floorspace, which the plan intends to deliver in a sustainable way. However, as identified above, our Client has concerns that, as currently proposed, the Draft Local Plan is not fully effective in respect of Site Allocation 6, given that the indicative development capacity has not been robustly justified, directly informed by the Evidence Base. Secondly, the draft affordable workspace Policy EC4 is not fully aligned with London Plan Policy E3. This should be reviewed and amended to ensure consistency across the Development Plan. The Draft Local Plan is currently inconsistent with the adopted London Plan in



this respect and there are compelling reasons for revisions to Policy EC4 within the Draft Local Plan.

8. CONCLUSION AND NEXT STEPS

Fosfel Apollo welcomes the opportunity to comment on the London Borough of Lewisham's Draft Local Plan. We trust the points raised in this representation will be taken into account and if you require any further clarification on matters, please do not hesitate to contact Victoria Orbart and Emily Keenan of this office.

**Yours faithfully**

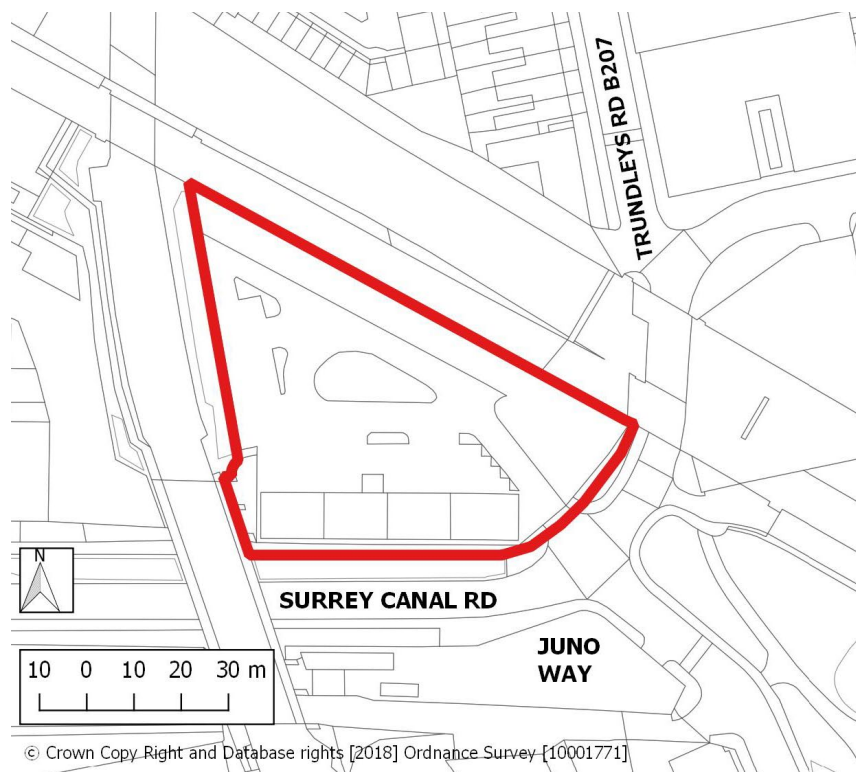
DP9 Ltd.

**DP9 Ltd.**



**APPENDIX A: LONDON BOROUGH OF LEWISHAM REGULATION 19 DRAFT LOCAL PLAN – SITE ALLOCATION**

## 6 Apollo Business Centre Locally Significant Industrial Site



<b>SITE ADDRESS</b>	Trundleys Road, London, SE8 5J				
<b>SITE DETAILS</b>	<b>Site size (ha)</b> 0.42	<b>Setting</b> Urban	<b>PTAL</b> 2015: 0-2 2021: 0-2 2031: 0-2	<b>Ownership</b> Mixed, public and private	<b>Current use</b> Industrial
<b>HOW SITE WAS IDENTIFIED</b>	London SHLAA (2017) and Strategic Planning Team (2019)				
<b>PLANNING DESIGNATIONS AND SITE CONSIDERATIONS</b>	Opportunity Area, Strategic Industrial Land (to be de-designated), Archaeological Priority Area, Creative Enterprise Zone, Air Quality Management Area, Flood Zone 3, within 30m of electricity cable.				
<b>PLANNING STATUS</b>	None				
<b>TIMEFRAME FOR DELIVERY</b>	<b>Years 1-5</b>	<b>Years 6-10</b> Yes	<b>Years 11-15</b>	<b>Beyond 15 years</b>	
<b>INDICATIVE DEVELOPMENT CAPACITY</b>	<b>Net residential units</b> 98		<b>Gross non-residential floorspace</b> Employment 3,396 Main town centre 0		

**Site allocation**

Comprehensive employment-led redevelopment on this re-designated Locally Significant Industrial Site.. Co-location of compatible commercial and residential uses.

**Opportunities**

The site is situated within the Surrey Canal Road Strategic Industrial Location, north of Surrey Canal Road and in proximity to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier along the north and western edges. It is currently occupied by a business centre. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed-use quarter, together with the Trundleys Road SIL and Neptune Wharf MEL sites. Replacement provision of employment land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment, along with the amenity of Folkestone Gardens and neighbouring residential areas

**15.46 Development requirements**

1. Development must be delivered in accordance with a masterplan to ensure coordination in the co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).
2. Development must not result in the net loss of industrial capacity, or compromise the function of the LSIS, in line with Policy EC6 (Locally Significant Industrial Sites).

3. There is an existing waste use at the site (Southwark Metals). Development proposals must address this use in accordance with Local Plan policy SD12 (Reducing and sustainably managing waste) and London Plan policy SI9 (Safeguarded waste sites).
4. Positive frontages along Surrey Canal Road and across from the railway arches.
5. New and improved public realm in accordance with a site-wide public realm strategy. This includes enhancements along Surrey Canal Road to improve the walking and cycle environment, along with access to Folkestone Gardens and to facilitate the delivery of Cycleway 10.

**15.47 Development guidelines**

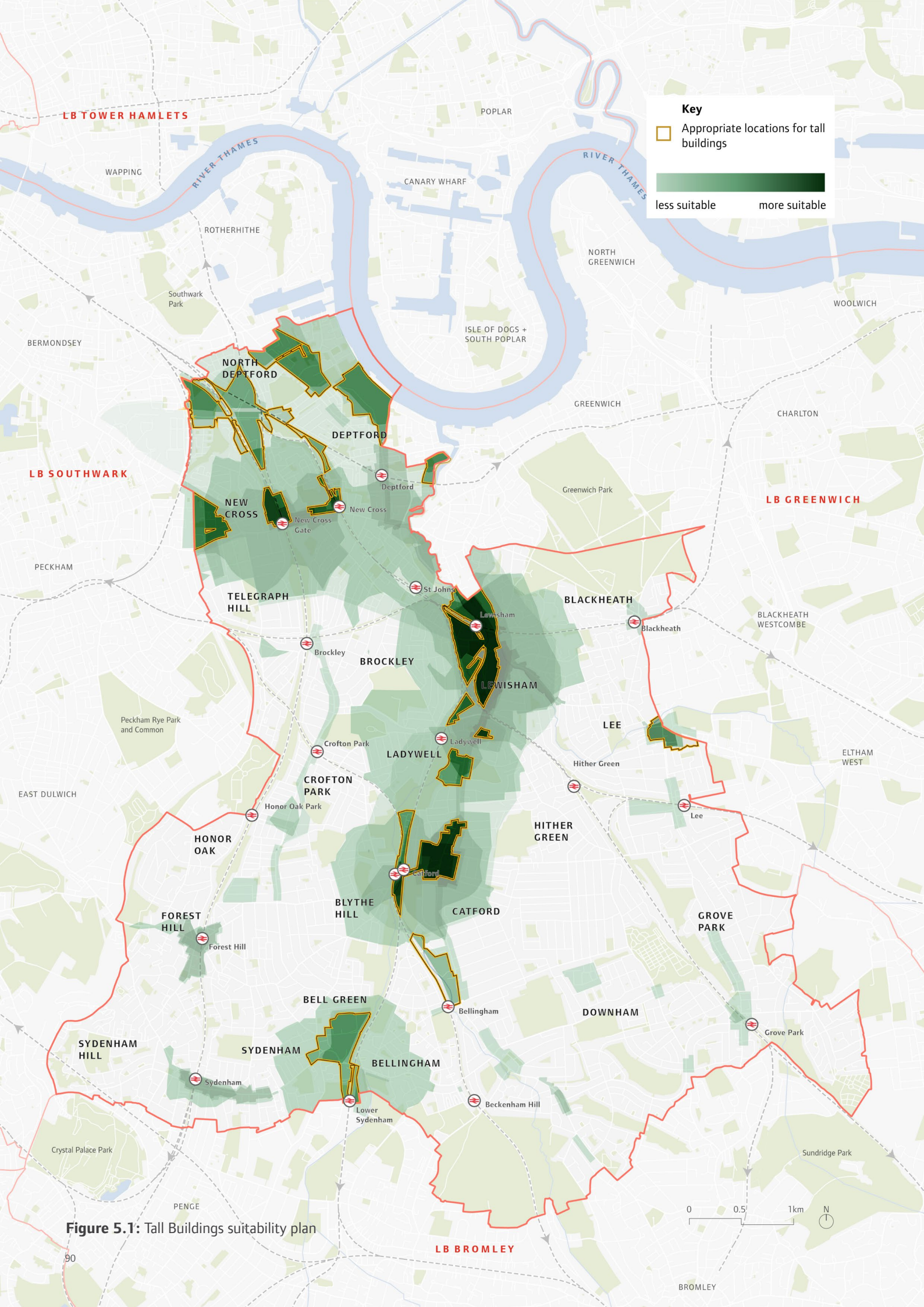
1. Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area.
2. Development will be expected to make provision for high quality and flexibly designed employment floorspace and units that are well-suited to the operational requirements of commercial and industrial occupiers. Particular consideration will need to be given to the development's functional and visual interface with the public realm and any non-commercial elements.
3. Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses

4. Applicants should consult and work in partnership with Network Rail, and landowners as appropriate, to optimise the use of the railway arches and create active frontages whilst retaining an appropriate clear zone. Proposals should investigate options for improved walking and cycle connections to Folkestone Gardens. This should include consideration of new or enhanced crossing facilities on Surrey Canal Road / Trundleys Road.
5. The design of development (including the scale, massing and height of buildings) should respond positively to Folkestone Gardens.
6. Proposals should investigate options to improve walking and cycle connections to Folkestone Gardens. This should include consideration of new or enhanced crossing facilities on Trundleys Road. Development should not result in a reduction in existing footway and carriageway space.
7. Development should be designed to enhance safety, including by sensitively integrated external lighting and layout to allow for natural surveillance of public realm, particularly around the railway bridges and walkways. Development should be designed with reference to, and seek to enhance, the industrial character of the site and its surrounds.
8. Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.
9. Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.
10. Applicants should work in partnership with Thames Water and engage with them early to manage surface water, survey the site for existing connections and divert existing sewers where applicable.



**APPENDIX B: LONDON BOROUGH OF LEWISHAM REGULATION 19 DRAFT LOCAL PLAN – TALL BUILDINGS SUITABILITY PLAN**





25 April 2023

**Delivered by email**

Planning Policy Team  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
Catford  
London  
SE6 4RU

Dear Sir/Madam

**THE LEWISHAM DRAFT LOCAL PLAN (REGULATION 19, JANUARY 2023) & PROPOSED CHANGES TO THE ADOPTED POLICIES MAP (DECEMBER 2022)  
WRITTEN REPRESENTATIONS ON BEHALF OF THE ARCH COMPANY PROPERTIES LP**

We write on behalf of The Arch Company Properties LP (“The Arch Company”) with respect to the Public Consultation on the emerging Lewisham ‘Proposed Submission Document’ Draft Local Plan (Regulation 19, January 2023) [hereafter: “Draft Local Plan”] and Proposed Changes to the adopted Policies Map (December 2022).

These written representations follow a previous set of representations made by our client in relation to the Public Consultation on the previous iteration of the Draft Local Plan (Regulation 18, January 2021) and Proposed Changes to the adopted Policies Map (December 2020). The principal subject of those – and these – written representations is the proposed addition of the Bermondsey Dive Under area to the Surrey Canal Road Strategic Industrial Location (“SIL”). Whilst our client is supportive of the emerging Local Plan in principle, for the reasons set out below, we consider that further revisions are still required to make the Plan ‘sound’ in respect of paragraph 35 of the National Planning Policy Framework.

***The Arch Company & LB Lewisham Portfolio***

It is considered that it will be helpful to provide some background information on The Arch Company’s activities nationally and their portfolio within the borough. The Arch Company acquired Network Rail’s former commercial estate business in 2019. It is the landlord for more than 4,000 businesses across England and Wales, making it the UK’s largest small business landlord, working with thousands of business owners, from car mechanics to bakeries and restaurants, who make a unique and vital contribution to the UK economy.

In regard to the potential implications of the emerging Draft Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in the Bermondsey Dive Under area and the land proposed to be designated as an addition to the Surrey Canal Road SIL in order to release other parts of this designation for redevelopment, namely sites at Evelyn Court, Trundleys Road and the Apollo Business Centre. Being the majority landowner in this area and taking account of the full scale of The Arch Company’s portfolio in the

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borough (totalling approx. 760,000 sq ft of business and employment space/land including, but not limited to, hundreds of railway arches), the potential implications of the Draft Local Plan are of significant importance (see **Annex 1** of our previous set of written representations for an overview of The Arch Company's landholdings in and around Bermondsey Dive Under and the wider borough). The Arch Company's portfolio includes a large number of railway arches and associated land located to the south of Silwood Street within the Bermondsey Dive Under area. The railway arches and the land in question have a lawful use of Class E(g) and B8, as confirmed via Certificates of Lawfulness issued in 2021 (refs. DC/21/121625 and DC/21/121626).

As such, our client has a strong interest in ensuring that the Draft Local Plan creates a strong, flexible and ambitious, but at the same time realistic, planning framework in order to facilitate the sustainable growth the borough requires.

***Draft Policy EC2 (Protecting employment sites and delivering new workspace), Table 8.1 & Proposed Changes to the adopted Policies Map (December 2022)***

Chapter 8 of the Draft Local Plan sets out the Council's ambition for a thriving economy and the protection and/or potential of employment and industrial land. To this extent, it is noted that the Council proposes the release of three individual sites (Evelyn Court, Trundleys Road and the Apollo Business Centre) from the overarching Surrey Canal Road SIL for redevelopment to provide a mix or *co-location* of uses including employment and/or residential. Given the protection of SIL and requirements contained in the London Plan (i.e. Policy E4) for its release and/or substitution, the emerging Local Plan and associated proposed changes to the adopted Policies Map seek to increase the boundary of the SIL to the north-west to include the Bermondsey Dive Under area, which includes one of our client's most significant land holdings (i.e. the land to the south of Silwood Street) in the borough.

As set out in detail in our previous set of written representations, our client considers that their land holding at Bermondsey Dive Under is well-suited to provide a continued (and lawful) range of employment uses (including 'softer' non-SIL uses within the outward-facing railway arches which can co-exist with surrounding and emerging residential uses); however, from a planning policy perspective, it is strongly considered that this site should continue to be treated as a Non-Designated Industrial Site or, if robustly justified, as LSIS, as its setting, constraints and surroundings are not deemed suitable to support and/or justify a SIL designation (when assessed against the London Plan which identifies other characteristics which are typical to SILs). This will be reflective of the current lawful uses on the site and adjacency to residential properties.

It is noted that further changes have been made within this consultation round with the railway arches being designated as LSIS and the wider curtilage/land being designated as SIL. It is considered that this approach is not sound, and it would result in likely operational conflicts with potential non-SIL uses operating in the railway arches not being able to use the adjacent yard space. It is therefore strongly recommended to amend the Draft Local Plan accordingly (i.e. Table 8.1 and the Proposed Changes to the adopted Policies Map) to a single consistent LSIS designation in order to ensure that it is robustly prepared, justified and sound in relation to this matter – and can therefore be fully supported by our client forming a strong framework for future development in the Bermondsey Dive Under area.

***Draft Policy EC9 (Railway Arches)***

As one of the majority landowners of railway arches in the borough, our client welcomes the Council's recognition that *"there are opportunities to maximise the use of the space of [railway] arches and the ancillary land adjacent to them"* (para. 8.52). As set out above, operating a vast number of railway arches across London, The Arch Company considers that these can cater for a wide range of uses and occupiers and be a significant contributor to the Council's ambition of building a strong economy. Our client therefore approves of the Council's amendments to Part A of EC9 to note that railway arches have the potential to positively contribute to the vitality and vibrancy of an area and to promote its resilience through the provision of a wide range of commercial, industrial, community, cultural or similar Sui Generis uses.

In relation to Part B of Policy EC9 – and as set out in our previous written representations – it is recognised that a number of railway arches may offer low-cost business space; however, these are market levels and reflective of their (often) lower specification and non-prime locations (as acknowledged in para. 6.2.4 of the London Plan and elsewhere in the Draft Local Plan, i.e. para. 8.23). Similarly, there is a significant difference between open arches accommodating a simple storage function and those that are (subsequently) refurbished to a higher specification attracting different types of uses and occupiers.

We would therefore reiterate the need to differentiate between existing low-cost (i.e. as described above) and affordable (i.e. as secured through a Section 106 Agreement) business space. Such a requirement is needed to be consistent with the London Plan (Policy E3 Affordable workspace). Where such an obligation exists for a site or where railway arches form part of a wider (comprehensive) redevelopment, it is considered acceptable to link it to the requirements of Draft Policy EC4 (Low-cost and affordable workspace); however, in all other cases the nature of a proposed development will need to be fully considered, as future investment in or upgrading existing railway arches to an enhanced specification may otherwise be constrained or undermined (i.e. if such future rent levels would not be reflective of their higher quality specification or a change of use). For this reasoning, it is deemed that the policy as drafted is not effective under the relevant tests.

Therefore, and to be deemed sound, whilst our client is therefore appreciative of the amendments that have been made to clarify this point, it is considered that there remains the potential for misconceptions in this area with regards to wider policies in the Draft Local Plan (i.e. Draft Policy EC4 referred to above). As set out in our previous set of written representations, we would therefore recommend **1**) removing the reference ‘lower-cost’ workspace from Part B of the draft policy wording and/or **2**) covering the provision of affordable workspace only in Draft Policy EC4 only which defines the relevant trigger points, with this not being duplicated in EC9.

Whilst our client is generally supportive of the Council’s aspirations to improve accessibility, it is considered that Part C of the draft policy wording does not fully reflect the commercial challenges associated with providing connections through arches (especially on more complicated sites where re-development projects already have to deal with significant pressures on viability). To ensure that the policy is robustly justified it is suggested that the policy wording should therefore be amended to state that:

*“Proposals must also investigate and maximise opportunities to improve accessibility by walking and cycling, including connections through existing arches where feasible, appropriate and viable.”*

In addition, it is considered that Part C should only be a material consideration for open and/or long-term vacant railway arches *rather than all* railway arches (including those completed and/or previously/currently occupied). Converted and occupied railway arches are no different from any other commercial and/or employment premises and, just as it would be unreasonable to propose cutting a route through, say, an existing warehouse, it is neither reasonable nor justifiable to expect applicants to consider doing so as part of all proposals relating to the use of railway arches. The wording as currently proposed is not therefore considered to be robustly justified.

Whilst we recognise the importance of consultation with key stakeholders prior to the submission or during the determination of a planning application, it is considered that the second sentence of Part E is in practice superfluous. Where they have interests in the railway lines above the relevant arches and/or adjoining highway land that would be affected by development proposals, Network Rail, Transport for London (“TfL”) and the Highway Authority will be consulted in their capacity as statutory consultees. In addition, and in regard to impacts on the railway network, this is considered to duplicate wider national regulations on safety on the railway network. This is therefore not considered to be effective and/or justified.

Our client is keen to avoid a situation in which the prior consultation of these authorities is required for even the most minor of works/change of use – as, it is anticipated, are they, given current resourcing constraints. We would

therefore request that this element is either **1)** amended to clarify that these authorities will be consulted where required in their capacity as statutory consultees or **2)** removed from Part E altogether.

## **Conclusion**

Overall, and as set out above, The Arch Company remains supportive of the general direction of the Draft Local Plan and relevant emerging policies contained within it, but – as set out in detail in the previous set of representations – strongly disagrees with the addition of their land holding at Bermondsey Dive Under to the Surrey Canal Road SIL, which is considered to be unjustified and likely to undermine future development opportunities within the area and/or negatively impact upon surrounding residential uses. Through the granting of planning permission ref. DC/20/116783 the LPA have confirmed that the character and context of Silwood Street has evolved to be that of a mix of uses and, therefore, a SIL designation is not deemed appropriate.

Our client is supportive of the Council's amendments to the proposed railway arches policy (Draft Policy EC9); however, and to be considered 'sound', they have proposed several further suggestions to ensure that the policy is sufficiently clear and effective, so as to enable the delivery and operation of these arches in an optimum manner which adequately reflects occupier demand, day-to-day operational/letting requirements and market conditions.

It is further considered that the vision and policies contained in the Draft Local Plan have the potential to meet the Council's ambitions of delivering good, sustainable growth in the borough during the plan period. Our client and we ourselves are more than happy to engage in positive and pro-active discussions with LB Lewisham if this is considered to assist the Council in preparing a sound and deliverable new Local Plan, and to bring forward new development across their portfolio over the coming years.

Please do not hesitate to contact my colleague Nick Edwards ([Nick.Edwards@turley.co.uk](mailto:Nick.Edwards@turley.co.uk)) or myself at this office should you require any further information or wish to discuss these representations.

Yours sincerely



Alex Christopher

**Director and Head of Planning, London**

[Alex.Christopher@turley.co.uk](mailto:Alex.Christopher@turley.co.uk)

9 April 2021

**Delivered by email**

Planning Policy Team  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
Catford  
London  
SE6 4RU

Dear Sir/Madam

**THE LEWISHAM DRAFT LOCAL PLAN (REGULATION 18, JANUARY 2021) & PROPOSED CHANGES TO THE ADOPTED POLICIES MAP (DECEMBER 2020)  
WRITTEN REPRESENTATIONS ON BEHALF OF THE ARCH COMPANY PROPERTIES LP**

We write on behalf of The Arch Company Properties LP (“The Arch Company”) with respect to the Public Consultation on the emerging Lewisham ‘Pre-Publication’ Draft Local Plan (Regulation 18, January 2021) [hereafter: “Draft Local Plan”] and Proposed Changes to the adopted Policies Map (December 2020), specifically with regard to the proposed addition of the Bermondsey Dive Under area to the Surrey Canal Road Strategic Industrial Location (“SIL”).

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In regard to the potential implications of the emerging Draft Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in the Bermondsey Dive Under area and the land proposed to be designated as an addition to the Surrey Canal Road SIL in order to release other parts of this designation for redevelopment, namely sites at Evelyn Court, Trundleys Road and the Apollo Business Centre. Being the majority land owner in this area and taking account of the full scale of The Arch Company’s portfolio in the borough (totalling approx. 760,000 sq ft of business and employment space/land including, but not limited to, hundreds of railway arches), the potential implications of the Draft Local Plan are of significant importance (see **Annex 1** for an overview of The Arch Company’s landholdings in and around Bermondsey Dive Under and the wider borough). The Arch Company’s portfolio includes a large number of railway arches and associated land located to the south of Silwood Street within the Bermondsey Dive Under area. The railways arches and land in question have a lawful use of Classes E(g), B2 and B8 and, for the avoidance of doubt, for the planned leasing of this land our client will shortly be confirming this position via a Certificate of Lawfulness submission.

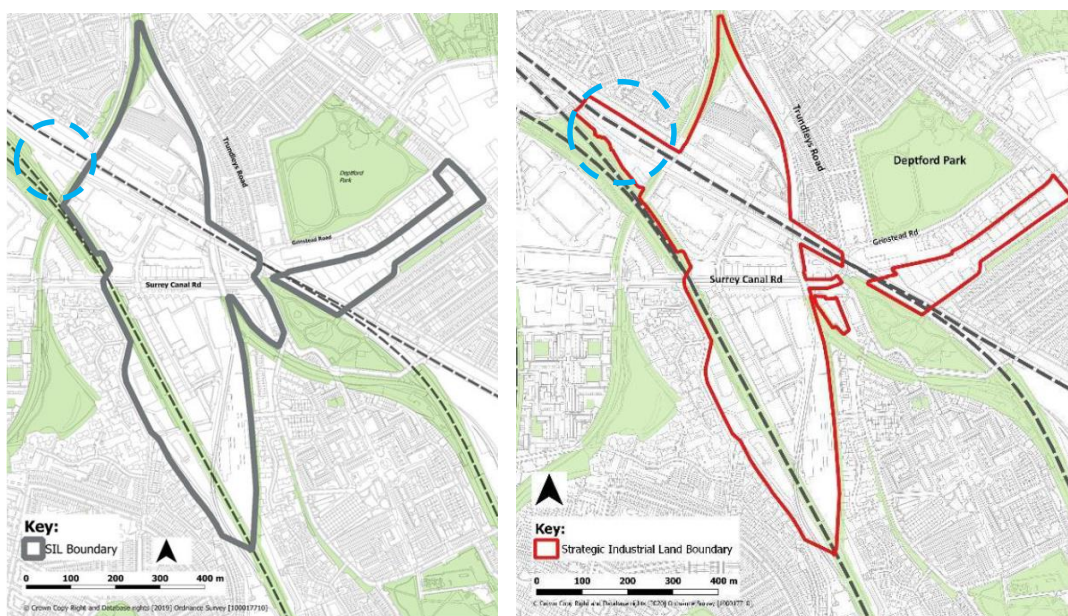
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As such, our client has a strong interest in ensuring that the Draft Local Plan creates a strong, flexible and ambitious, but at the same time realistic planning framework in order to facilitate the sustainable growth the borough requires.

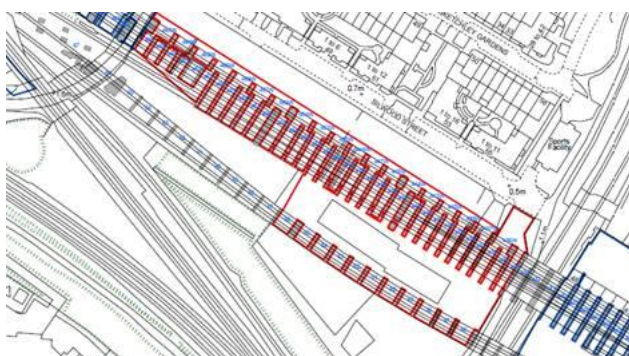
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Chapter 8 of the Draft Local Plan sets out the Council’s ambition for a thriving economy and the protection and/or potential of employment and industrial land. To this extent, it is noted that the Council proposes the release of three individual sites (Evelyn Court, Trundleys Road and the Apollo Business Centre) from the overarching Surrey Canal Road SIL for redevelopment to provide a mix or *co-location* of uses including employment and/or residential. Given the protection of SIL and requirements contained in the London Plan (i.e. Policy E4) for its release and/or substitution, the emerging Local Plan and associated proposed changes to the adopted Policies Map seek to increase the boundary of the SIL to the north-west to include the Bermondsey Dive Under area (see **Figure 1**) which includes one of our client’s most significant land holdings (i.e. the land to the south of Silwood Street) in the borough (as set out in **Figure 2** and **Annex 1**).

**Figure 1: Existing vs. Proposed SIL Boundary with the Bermondsey Dive Under area circled in blue**



**Figure 2: OS Map Extract of The Arch Company’s land holding to the south of Silwood Street**



It is important to note that The Arch Company is fully aware of **(1)** the South Bermondsey Dive Under Masterplan (2019) prepared by Lyndon Goode Architects on behalf of Network Rail, LB Southwark and LB Lewisham which represents one of many possible redevelopment scenarios for the area as well as **(2)** the recently approved mixed use redevelopment of the *Land at Silwood Street* comprising four blocks with building heights of five to nine storeys

providing flexible light industrial/office/retail/cafe/community floorspace (Use Classes B1a/B1c/A1/A3/D1) at ground/first floor levels and 61 residential units on the upper floors (LPA ref. DC/20/116783). This site sits directly adjacent to our client’s land holding and shares a boundary with the main access road to a number of railway arches and the proposed SIL designation (with access to land component running past the frontage of the site).

For the avoidance of doubt, our client wishes to clarify that it considers that its land holding at Bermondsey Dive Under, including the railway arches and all associated yard space, can continue to play an important role in providing employment-generating uses in this part of the borough. However, it is not considered that a simple extension of the SIL boundary is justified in this instance (or in accordance with Paragraph 35 of the NPPF) and will therefore not secure the optimum future use of the area.

In fact, neither the *Lewisham Local Economic Assessment (December 2018)* nor the subsequent *Lewisham Employment Land Study (March 2019)*, both prepared by CAG Consultants, (or the 2019 Masterplan referred to above) assessed the Bermondsey Dive Under area in relation to its suitability as a potential replacement SIL or considered alternative sites for this purpose. It is therefore neither clear nor justified on what basis this site has been selected to be designated as SIL with relevant changes to the Policies Map and/or as specified in Table 8.1 of the Draft Local Plan therefore considered unsound.

The Council’s intention to ‘substitute’ land released from the SIL for alternative uses by including other land within this designation (i.e. in order to ensure that area-wise there is no net loss) is acknowledged. However, it is not considered that the Bermondsey Dive Under area is a suitable SIL replacement site.

### **Purpose of London’s Strategic Industrial Locations and their typical requirements/attributes**

For the avoidance of doubt, there are approximately 7,000 hectares of industrial land in London, of which approx. 50 per cent are designated as SIL<sup>1</sup>. Paragraph 6.5.1 of the London Plan describes SILs as “*the capital’s main reservoir of land for industrial, logistics and related uses*” which are therefore given strategic protection because they are critical to the operation of the capital’s economy.

Policy E4(A) of the London Plan seeks to ensure “[a] sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution”. Policy E5 further sets out the purpose and preferred uses for SILs (as specified in Policies E4(A) and E5(C) and listed below) as well as its overall purpose which is “*to sustain [SILs] as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy*”.

The London Plan also identifies other characteristics which are typical to SILs, in terms of the types of uses and locations summarised in **Table 1** below.

**Table 1: Typical Characteristics and Requirements for SIL designations**

Characteristics of a SIL	Wording/Requirement as outlined in the London Plan
<b>Types of Uses</b>	<p>Para. 6.5.1: SILs can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.</p> <p>This includes the uses set out in Policy E4(A), namely:</p> <p style="text-align: center;">1) <i>light and general industry (Use Classes B1c and B2)</i></p>

<sup>1</sup> CAG et al. (2017), London Industrial Land Demand, Final Report



- 2) *storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points*
- 3) *secondary materials, waste management and aggregates*
- 4) *utilities infrastructure (such as energy and water)*
- 5) *land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure*
- 6) *wholesale markets*
- 7) *emerging industrial-related sectors*
- 8) *flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population*
- 9) *low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space)*
- 10) *research and development of industrial and related products or processes (falling within Use Class B1b)*

As set out in Policy E5(C), development proposals in SILs should be supported (by LPAs) where the uses proposed fall within the industrial-type activities set out above.

## Location

Para. 6.5.2: Typically, SILs are located close to the Strategic Road Network and many are also well-located with respect to rail, river, canals and safeguarded wharves which can support the sustainable movement of goods, construction materials and waste to, from and within London.

Proximity to the Strategic Road Network ("SRN") is an important consideration for occupiers in the industrial market, particularly those which frequently move large volume of goods such as manufacturing or logistics. The SRN for London's freight movements has been identified as including the M25, M4, M40/A40, A1, A2, A12, A13, A406 (North Circular), A205, and A3<sup>2</sup>. Immediate proximity to these roads forms part of the 'sweet spot' for warehouse/logistics occupiers and therefore a distance of up to 1 mile is considered most attractive for such uses. Almost half of SILs (54.5% or 30 SILs) are located in close proximity to rail access and over a third (34.5% or 19 SILs) are accessible by water. These SILs therefore have potential to use these modes in the future if they do not do so already.

Although surrounded by railway lines, it is not considered that moving freight by rail is a realistic option for the Bermondsey Dive Under area and will therefore remain reliant on road with the nearest SRN being approx. 1.2 miles from the centre of the site, therefore:

- a) Not in immediate proximity to the SRN;
- b) Heavily relying on the transfer of goods along Silwood Road which would limit the appropriate SIL uses as set out in Policy E4(A) above (being reflective of a lower order employment designation); and

<sup>2</sup> These roads have been identified as London's freight SRN in Keep London Working (SEGRO, 2017) with the exception of the A3 which has been included to cover the south west of London.

	c) Expecting difficulties to provide access to the wider area/railway arches for HGVs which may potentially limit land uses or occupier interest.
<b>Logistics function</b>	Para. 6.5.2: To ensure that London can retain an efficient logistics function it is particularly important to secure and enhance strategic provision in SILs in west London, especially at Park Royal and around Heathrow; in north London in the Upper Lee Valley; in east London, north and south of the Thames; and in the Wandle Valley in south London. This should be complemented by smaller-scale provision in Locally Significant Industrial Sites (“LSIS”) and Non-Designated Industrial Sites including sustainable ‘last mile’ distribution close to central London.

### Relevance for the Draft Local Plan & Recommendation/Suggested Amendments

As set out above, the primary purpose of SILs, according to the London Plan, is to ‘support the functioning of London’s economy’ and its role and function can be summarised in the following way:

- Make provision for “*industrial-type activities*” which includes Use Classes B1b/c (or Class E(g)(ii)/(iii)), B2, B8, waste management, utilities, transport, markets, low-cost industrial and related space for micro, small and medium-sized enterprises and R&D uses;
- Activities which “*can raise tensions with other land uses, particularly residential development*”; and
- Support sustainable movement of goods through being located “*close to the strategic road network and many are also well-located with respect to rail, river, canals and safeguarded wharves*”.

As such, the Council needs to be fully aware that any such designation means that it should make provision for the varied operational requirements of any of the above uses within the area including the railway arches adjacent to the approved mixed use residential development on Silwood Street (LPA ref. DC/20/116783) and its main access road running to the rear of the approved residential uses.

At this stage, the evidence base published by the LPA is not considered to be sufficient and/or sound in order to justify the designation of the area as ‘new’ SIL (also see London Plan Policy E5(B)). It is also seen as problematic to grant planning permission for a residential-led development prior to designating the adjacent land as SIL, as proposals “*adjacent to SIL should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis*” (Policy E5(d)).

Reiterating what has been set out above, our client considers that their land holding is well-suited to provide a continued (and lawful) range of employment uses (including ‘softer’ non-SIL uses within the outward facing railway arches which can co-exist with surrounding and emerging residential uses), however, from a planning policy perspective this site should continue to be treated as a Non-Designated Industrial Site or, if robustly justified, as LSIS, as its setting, constraints and surroundings are not deemed suitable to support and/or justify a SIL designation. This will be reflective of the current lawful uses on the site and adjacency to residential properties.

It is therefore strongly recommended to amend the Draft Local Plan accordingly (i.e. Table 8.1 and the Proposed Changes to the adopted Policies Map) in order to ensure that it is robustly prepared, justified and sound in relation to this matter – and can therefore be fully supported by our client forming a strong framework for future development in the Bermondsey Dive Under area.

### **Draft Policy EC8 (Railway Arches)**

As one of the majority land owners of railway arches in the borough, our client welcomes that the Council recognises that “*there are opportunities to maximise the use of the space of [railway] arches and the ancillary land adjacent to*

them” (para. 8.44). As set out above, operating a vast number of railway arches across London, The Arch Company considers that these can cater for a wide range of uses and occupiers and be a significant contributor to the Council’s ambition of building a strong economy. Railway arches further have the potential to positively contribute to the vitality and vibrancy of an area and to promote its resilience through a diversity of uses, particularly within or in close proximity to town centres.

Depending on their location and surrounding uses/occupiers, railway arches should therefore be able to cater for a wide range of uses including industrial, commercial, community (i.e. gyms), economic (i.e. workspace) and/or storage and distribution uses, but also wider town centre and leisure uses (where appropriate), in order to provide the flexibility that is required by (potential) occupiers when adapting to market needs/demand and to ensure that they actually meet their full potential.

At present, the draft policy wording is unfortunately considered to be somewhat unclear and potentially restrictive to future development, thereby limiting the use of railway arches where this may lack flexibility and in turn be detrimental from an economic (recovery) perspective. Similar to what is reflected in other (emerging) railway arch policies across London, it is recommended to refine the draft wording in order for it to:

1. Be fully effective;
2. Be responsive in respect of the impacts of the COVID-19 pandemic and our economic recovery;
3. Provide (small/local) businesses and future occupiers with the flexibility as well as clarity required to invest in an area; and
4. Ensure that railway arches can accommodate a wide range of (acceptable) uses.

As such, our client recommends the following amendments to the draft policy wording:

*“A. Development proposals involving railway arches will be supported where:*

*a1. The principal use is for an appropriate commercial (including town centre, community, leisure and/or business uses) or industrial use (Class E(g)(ii)/(iii), B2 and B8), certain sui generis uses in appropriate locations where these do not cause harm to the amenity of surrounding uses and occupiers, or otherwise for an operational use associated with the railway;*

*a2. In designated employment [or industrial] areas (i.e. LSIS, SIL) or Non-Designated Industrial Land, the principal use shall be limited to appropriate Class E(g), B2, B8 uses and/or related sui generis or other uses that relate to, and support, the industrial nature and operation of the area, or otherwise for an operational use associated with the railway, unless where they form part of a masterplanned redevelopment (see Part B);*

*[...]”*

Part a2 has been added to provide clarity on acceptable uses within railway arches in designated employment areas and/or industrial land (i.e. LSIS, SIL, MEL or Non-Designated Industrial Land). It is important to differentiate between designated industrial and other locations to provide businesses and occupiers with the clarity they need.

In relation to Part A(e), it is recognised that a number of railway arches may offer low-cost business space, however, these are market levels and reflective of their (often) lower specification and non-prime locations (as acknowledged in para. 6.2.4 of the London Plan and elsewhere in the Draft Local Plan, i.e. para. 8.21). Similarly, there is a significant

difference between open arches accommodating a simple storage function and those that are (subsequently) refurbished to a higher specification attracting different types of uses and occupiers.

As such, it is first of all important to differentiate between existing low-cost (i.e. as described above) and affordable (i.e. as secured through a Section 106 Agreement) business space. Where such a Section 106 Agreement exists for a site or where railway arches form part of a wider (comprehensive) redevelopment, it is considered acceptable to link it to the requirements of *Draft Policy EC4 (Providing suitable business space and affordable workspace)*, however, in all other cases the nature of a proposed development will need to be fully considered, as future investment in or upgrading existing railway arches may otherwise be constrained or undermined (i.e. if such future rent levels would not be reflective of their higher quality specification or a change of use).

It will therefore be important to avoid a misconception in this area with wider policies in the Draft Local Plan (i.e. Draft Policy EC4 referred to above) and it is recommended to **(1)** remove reference to 'lower-cost' workspace from Part A(e) of the draft policy wording and **(2)** to cover the provision of affordable workspace in Draft Policy EC4 only (see comments/suggestions below). However, the supporting text to Draft Policy EC8 may clarify that railway arches often provide low-cost business space (as set out above and in the London Plan) which may be re-provided if the nature of the proposals remain comparable and/or that Draft Policy EC4 applies where railway arches form part of a wider comprehensive redevelopment.

Whilst we recognise the importance of consultation with key stakeholders prior to the submission or during the determination of a planning application, it is considered that Part C of the draft policy wording may be onerous for future applicants. Network Rail and Transport for London ("TfL") may not both have an interest in the railway lines above respective arches and/or their asset(s) and/or TfL-managed roads may not be affected by the nature of the development proposals (i.e. a simple change of use). The policy wording should therefore be amended to state that: *"Network Rail and/or Transport for London should be consulted on development and design options where appropriate and required to ensure that development will not adversely impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure"*.

### ***Draft Policy EC4 Providing suitable business space and affordable workspace***

Whilst our client is generally supportive of the Council's objective to secure (suitable and) affordable workspace, it is important to:

- a) Highlight that the provision of such floorspace will have to be subject to viability testing (especially in designated industrial land within which redevelopment projects already have to deal with significant pressures on viability, particularly in co-location schemes, and therefore affordable workspace may result in a conflict with the provision of affordable housing or other infrastructure). To this extent, it is acknowledged that para. 8.23 of the Draft Local Plan refers to a viability tested route, however, to be clear and transparent this should be recognised in the main policy wording in order for the provision of affordable workspace (on/off-site) to be justified; and
- b) In relation to railway arches (Part D(d)), the same comments as set out in relation to Draft Policy EC8 above apply where it relates to railway arches.

### ***Conclusion***

Overall, and as set out above, The Arch Company is supportive of the general direction of the Draft Local Plan and relevant emerging policies contained within it, but strongly disagrees with the addition of their land holding at Bermondsey Dive Under to the Surrey Canal Road SIL and considers that this designation is unjustified and will undermine future development opportunities within the area and/or negatively impact upon surrounding residential uses. Through the granting of planning permission ref. DC/20/116783, the LPA have confirmed that the character and context of Silwood Street has evolved to be that of a mix of uses and therefore a SIL designation is not deemed appropriate.

Our client is supportive of establishing a new railway arches policy (Draft Policy EC8), but has proposed suggestions to ensure it is clear and effective in order to provide the flexibility required to operate these arches in the best possible way which adequately reflects occupier demand, day-to-day operational/letting requirements and market conditions.

It is further considered that the vision and policies contained in the Draft Local Plan have the potential to meet the Council's ambitions of delivering good, sustainable growth in the borough during the plan period. Our client and we are more than happy to engage in positive and pro-active discussions with LB Lewisham if this is considered to assist the Council in preparing a sound and deliverable new Local Plan, and to bring forward new development across their portfolio over the coming years.

Please do not hesitate to contact my colleague Christopher Schiele ([Christopher.Schiele@turley.co.uk](mailto:Christopher.Schiele@turley.co.uk)) or myself at this office should you require any further information or wish to discuss these representations.

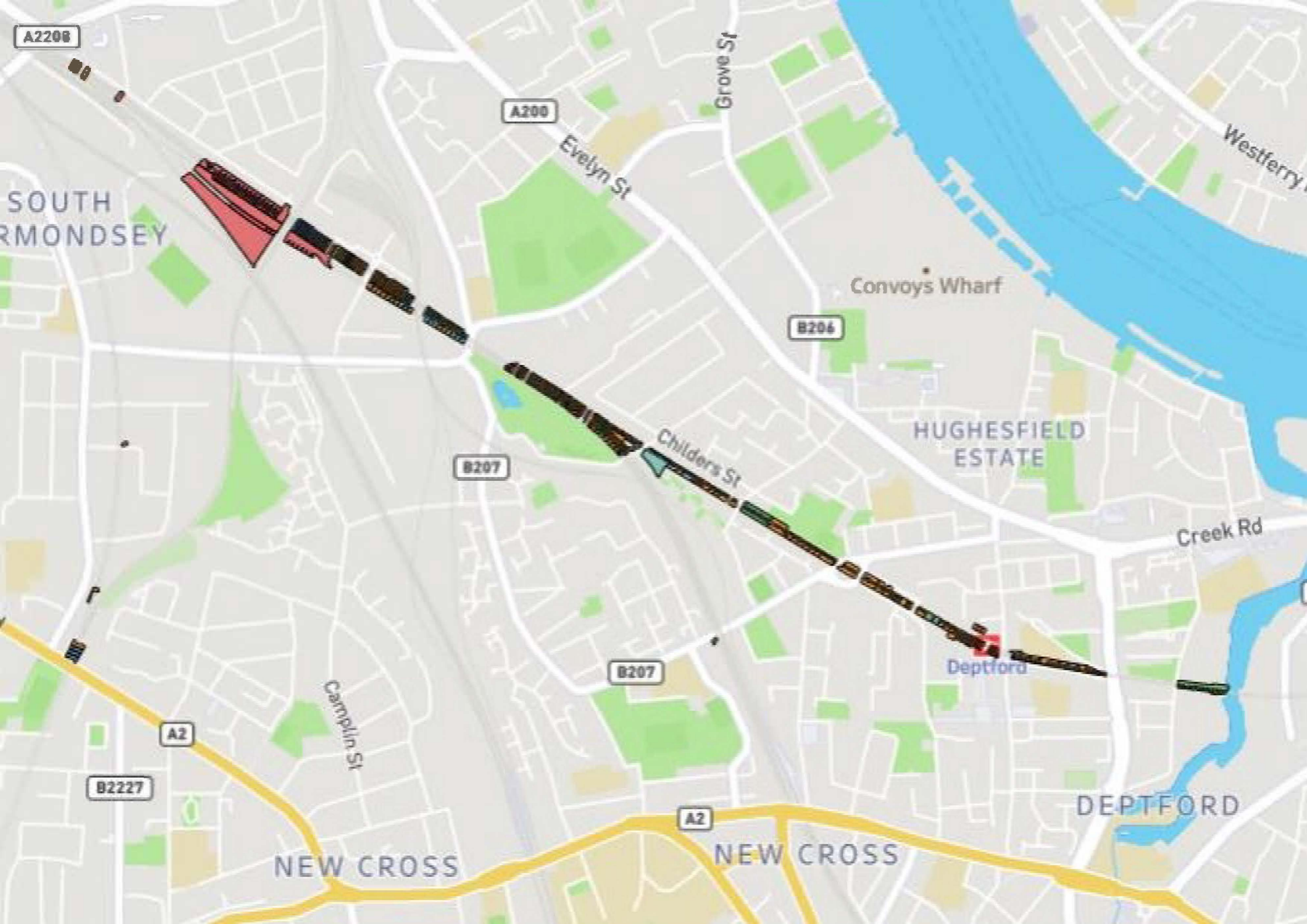
Yours sincerely



Alex Christopher  
**Director**

[Alex.Christopher@turley.co.uk](mailto:Alex.Christopher@turley.co.uk)

***Annex 1: The Arch Company Land Holdings in/around Bermondsey Dive Under and wider LB Lewisham***



A2208

A200

Grove St

Evelyn St

SOUTH  
RMONDSEY

Convoys Wharf

B206

Westferry

HUGHESFIELD  
ESTATE

B207

Childers St

Creek Rd

Deptford

B207

Campbell St

A2

B2227

NEW CROSS

A2

NEW CROSS

DEPTFORD

Office 3.18, Scott House  
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25 April 2023

Local Plan,  
Lewisham Planning Policy,  
London Borough of Lewisham,  
Laurence House,  
1 Catford Rd, Catford,  
London SE6 4RU.

Via email: [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

F.A.O. David Syme

Dear Sir/Madam

**LEWISHAM LOCAL PLAN : Regulation 19 stage “Proposed Submission” document, January 2023**

### **Representations on behalf of The Renewal Group**

We act on behalf of The Renewal Group who are the developers of the New Bermondsey site (part of the Surrey Canal Triangle site) in the North Area of the London Borough of Lewisham. The representations below are made having regard to the development of this site.

### **Policy QD4 Building Heights**

We note that the policy has been largely revised from the Regulation 18 version.

Policy D9 of the London Plan requires that local authorities identify appropriate areas for tall buildings but also sets out the need for proposals to meet other criteria through the planning process to establish exact heights.

We note and support Figure 5.3, which anticipates up to 45 storeys on Renewal’s land (New Bermondsey) (based on the townscape and other analysis which led to the Resolution to Grant Planning Permission of January 2022 under application reference: DC/20/119706).





However, in anticipation of possible delivery of major infrastructure over the plan period (for example, Surrey Canal Overground Station and the extension of the Bakerloo Line), in part B of the policy, flexibility should be incorporated to respond to such emerging areas of infrastructure improvements over the whole plan period. This is consistent with paragraph 22 of the NPPF and as such is requested for soundness. appropriate wording should be incorporated in this regard, such as:

*“Development proposals for tall buildings outside of these zones will be resisted, except where major improvements in infrastructure are made over the whole plan period.”*

Part C should refer to Figure 5.1 - Tall Buildings Suitability Plan, for clarity.

We still have concerns around the use of “*exceptionally good*” design in D(b) and would draw your attention to the wording in the London Plan Policy D9 (Tall Buildings) Part C (c), which states:

*“architectural quality and materials should be of **an exemplary standard** to ensure that the appearance and architectural integrity of the building is maintained through its lifespan”* (our emphasis)

We consider the council’s requirement for “*exceptionally good*” is too subjective, inconsistent with the London Plan and will, therefore, fail to be effective.

We note that the wording of D(d) refers to “*unacceptable adverse ... impacts*” (our emphasis) and we would ask that this clarity is included in D(f), which still confirms that tall buildings “*Will not adversely impact...*”. The current wording is inconsistent with national policy. Further, guidance documents in relation to such matters always refer to the need to take a flexible approach and the current wording does not facilitate this.

We note Part F references DM4 and should reference DM3 (Masterplans and comprehensive development).

## **Policy QD8 High Quality Housing Design**

Part G of this policy has been amended from the Regulation 18 version to confirm that the council will be particularly resistant to single aspect north facing dwellings. However, London Plan Policy D6 Part C states:

*“A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity ....”*

Policy QD8 Part G should be amended to clarify the need to optimise site capacity in line with Policy QD6 in order to comply with London Plan policy and render policy QD8 sound.



## **Policy HO3 Genuinely Affordable Housing**

Affordable housing provided as part of Build to Rent (BTR) developments in line with Policy H11 of the London Plan should be supported and needs to be set out in the Lewisham Local Plan. We note that the definition of Build to Rent in the Glossary to the Local Plan (Regulation 19 proposed submission document) references London Plan Policy H11 and Build to Rent is referenced in the definition of “Affordable Housing for Rent” in Technical Appendices A and D in the Strategic Housing Market Assessment 2021/22, which forms part of the evidence base, but there is no direct reference to BTR in Policy HO3. This should be rectified to make policy HO3 consistent with the London Plan and meet the tests of soundness.

## **Policy EC18 Culture, Creative Industries and the Night-time Economy**

This new policy has been extracted from Policy EC1 (A Thriving and Inclusive Local Economy) in the Regulation 18 version. Part B of this new policy protects existing cultural venues and uses, and subparagraph (b) confirms that loss of these will only be permitted if a period of sustained marketing has failed to find a suitable tenant. However, it is important that such venues are only protected where they are viable and self-sustaining, and where this is a reasonable approach having regard to other objectives, including delivery of the plan. This policy should be revised to ensure there is no conflict with the strategic objectives of the local plan.

It is also important that meanwhile cultural venues and uses are not protected. The wording of the policy is confusing and appears to retain meanwhile uses at the cost of new homes and employment opportunities. Part B(c) states the following:

*“Development proposals involving the loss of cultural venues...should be avoided. They will only be permitted where:*

*c. The use is not a meanwhile use”*

There appears to be no evidence base for the retention of meanwhile or short-term uses.

It is important that the policy is adjusted to provide clarity on the matters raised above in order to achieve the borough’s strategic objectives and ensure the plan is sound.



## **Policy EC4 Low Cost and Affordable Workspace**

This policy is new compared with the Regulation 18 version and requires that at least 10% of the net internal area of commercial floorspace (E(g), B2, B8 & sui generis) of a development proposal must be available at 50% of the open market rent or a payment for off-site provision must be made. There is also a requirement for existing low cost floorspace to be retained or reprovided.

It is not clear whether this retained and/or reprovided space is in addition to the proposed new space. There appears to be no justification for the pricing proposed nor evidence of where an off-site provision might be made. It is also still not clear whether affordable workspace should be taken into account in any viability appraisals prior to the calculation of the maximum amount of affordable housing.

We consider it inappropriate to require that B8 and sui generis floorspace should contribute to the 10% low-cost requirement given the economic scale of B8 space and the use types covered by Use Class sui generis set out in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

These matters should be clearly addressed in the policy and supporting explanatory text, and in the council's evidence base. Currently, we consider the policy does not meet the tests of soundness.

## **Policy EC7 Mixed Use Employment Locations (MEL)**

This policy needs to reflect the London Plan and permitted development rights in order to be sound.

## **Policies EC11 – EC17 Town Centre Policies**

These policies need to be updated in relation to permitted development rights in order to be sound.

## **Policy CI1 Safeguarding and Securing Community Infrastructure**

This policy needs to make clear that it does not seek to protect short-term meanwhile uses. As drafted, the policy could adversely impact the delivery of the plan and there is no justification in the supporting evidence base for the retention of short-term or meanwhile uses. Community Infrastructure is related to the Infrastructure Delivery Plan (September 2022) and there appears to be no relevant reference to short-term or meanwhile in the evidence base. The policy wording should be clarified in this regard to meet the tests of soundness.

## **Policy LNA3 Creative Enterprise Zone**

It would be helpful if the extent of the CEZ was shown on Figure 8.12 in relation to Policy EC4.



## Site Allocation 9: Surrey Canal Triangle Mixed Use Employment Location

The details in the allocation need to be updated, for example in relation to the following:

- The current use of the site is Millwall FC Stadium and the Millwall Community Scheme (Lions Centre), including a sports hall, a covered astro-turf pitch and surface car parking; industrial and light industrial uses with surface car parking and servicing space, together with workshop space and 27 residential units
- A Section 73 application was granted in 2013 under reference: DC/13/085143.
- A “clear north-south route linking South Bermondsey Station to Bridgehouse Meadows and the new Overground Station” can only be fully achieved with land beyond the control of Renewal, MFC and the Council. The policy needs to clarify this and not require the developers of the site to provide it in full. The Surrey Canal Triangle SPD (2020) acknowledges this by requiring the following:

*“Improved public access into the site from South Bermondsey Station to the North;” and*

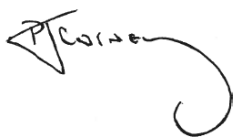
*“A key north south diagonal pedestrian link across the site should be provided connecting the new Surrey Canal Station, through to a new stadium plaza and onto Bolina in the north-west of the site.”*

The Development Guidelines at paragraph 15.65 (2) should be amended in this regard to meet the tests of soundness with particular regard to deliverability and consistency with adopted policy.

We are very happy to liaise with you further in relation to the above representations as part of the evolution of the Local Plan and in particular, we would be pleased to be invited to participate directly in the Examination in Public in due course.

It has not been possible to access the Representation Form on the website although there is an explanation that the council is currently experiencing technical problems in this regard. We thus make this statement of our willingness to be involved as the plan moves towards adoption in this letter.

Yours faithfully



**Director**  
**CarneySweeney**





Lewisham Planning Policy  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
London  
SE6 4RU

25 April 2023

Dear Sir or Madam,

## **LEWISHAM LOCAL PLAN: PROPOSED SUBMISSION DOCUMENT – REGULATION 19 CONSULTATION**

On behalf of our client, Sainsbury's Supermarkets Ltd (SSL), we make this submission in response to the current consultation in respect of the draft Local Plan (Regulation 19).

Sainsbury's occupy two large stores in Lewisham at Lee Green and at Bell Green (Sydenham). Both of these stores have been allocated within the draft Local Plan for redevelopment. Whilst we support the aspiration to provide housing, both allocations lack clarity as to whether a store of the same size as existing will be re-provided on the site, and whether continuity of trade will be ensured during the construction phase.

The existing Sainsbury's stores are essential for the vitality and viability of Lee Green and Bell Green. SSL are a major employer and the disruption caused by development, particularly if continuity of trade is not ensured and/or if a significantly smaller store is proposed, would have a significant negative impact on Sainsbury's business, the colleagues currently employed on site and the local community who rely on Sainsbury's for their grocery shopping.

The Sainsbury's stores at Lee Green and Sainsbury's Bell Green currently trade very well, with many shoppers visiting the store either on foot, by bicycle or by car. Sainsbury's Lee Green has over 30,000 transactions (excluding online sales) in store every week and the Bell Green store has more than 45,000 transactions. These are high numbers of physical visits. Many of these shoppers link their trip with a visit to other nearby facilities in the area.

In summary, if the redevelopment of the two allocations go ahead without making reference the re-provision of an equivalent Sainsbury's foodstore and appropriate car parking, there will be a serious reduction in the accessibility to essential grocery needs for the local community, a disastrous loss of jobs which will largely be felt by local residents, the growth of unsustainable shopping patterns, and potentially adverse highways impacts as demand and trips are diverted to more distant stores.

We have also reviewed the policy wording of the draft Local Plan and make a number of suggestions below.

These representations are structured as follows:

- Emerging Policies – General SSL comments on a number of pertinent policies; and
- Emerging Allocations – SSL comments on the Lee Green and Bell Green allocations specifically.



## Emerging Policies

### POLICY SD2 SUSTAINABLE DESIGN AND RETROFITTING

Policy SD2 states that development proposals for major non-residential refurbishment, including mixed use development, will be required to achieve a certified 'Excellent' rating.

In our experience it is extremely difficult to achieve an Excellent rating when assessing 'Shell only' commercial units. When you assess the 'Shell only' there are large number of credits that are not available, mainly due to the required assessment credits not necessarily being specified (M&E for performance, commissioning and monitoring for example).

We request an amendment to the policy wording that states that (red means new wording):

*"development should achieve BREEAM very good for 'Shell only' commercial developments, with best endeavours to reach excellent target for Fit out"*

### POLICY QD1 DELIVERING HIGH QUALITY DESIGN IN LEWISHAM

Policy QD1 states that development proposals must be designed to address (red means new wording):

- a. Natural features including trees, landscape, topography, open spaces and waterways;
- b. The prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces);
- c. The proportion of development (including height, scale, mass and bulk) within the site, its immediate vicinity and the surrounding area;
- d. Building lines along with the orientation of and spacing between buildings;
- e. Strategic and local views, vistas and landmarks;
- f. Townscape features;
- g. The significance of heritage assets and their setting;
- h. Architectural styles, detailing and materials that contribute to local character; and
- i. Cultural assets.

It is considered that meeting these design criteria although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these circumstances. We would advise that an exceptions criterion is inserted into the policy such as:

*"It is acknowledged that meeting this design criteria is not always achievable due to site constraints and this should be negotiated on a site-by-site basis"*

### POLICY GR3 BIODIVERSITY AND ACCESS TO NATURE

Policy GR3 states that 'Development proposals should seek to secure Biodiversity Net Gain. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric.'

It is noted that this policy although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these exceptional circumstances.



BNG will become a statutory requirement from November 2023 and will be introduced through the Environment Act 2021. The 'Understanding biodiversity net gain' Government Guidance document recognises that it is not always feasible to provide a net gain on-site and/or off-site. The Guidance confirms that if on-site or off-site land cannot be used, statutory credits can be purchased from the government as an alternative. The following wording could be accommodated to ensure that Policy GR3 is consistent with national objectives (red means new wording).

*"It is acknowledged that providing Biodiversity Net Gain on-site and/or off-site is not always achievable and if this cannot be accommodated then statutory credits must be sought"*

## Emerging Allocations

### THE NEED FOR A REPLACEMENT FOODSTORE

The existing Sainsbury's stores provide an essential grocery offer at Lee Green and Bell Green and there is an opportunity for them to perform a crucial anchor role in the redevelopment of these two sites. Inclusion of a new foodstore will create activity and focus to the residential components of these sites. Sainsbury's have a proven track record of delivering high-quality mixed-use redevelopment in London. For example, at their Hendon store where they have partnered with an experienced housebuilder to provide 1,300 new homes, a new Sainsbury's store and other business floorspace as well as high quality public realm.

The Sainsbury's Lee Green store is currently allocated for 111 net residential units, 625sqm of employment floorspace and 4,123sqm of town centre uses

The Sainsbury's Bell Green store is allocated for 550 – 1,347 residential units, 2,751 sqm of employment floorspace and 11,003 sqm of town centre uses.

Although there is a general statement that 'compatible main town centre' uses are also appropriate, and that redevelopment should allow for the re-provision of a supermarket, no specific reference is made to re-providing the Sainsbury's foodstore of the same size as existing stores on site.

Policy EC8 seeks to prevent the net loss of viable industrial capacity on non-designated employment sites because their important role in the local economy and in creating job opportunities. The two Sainsbury's stores provide over 500 jobs on site and these jobs should be as highly valued as jobs in other employment sectors. Not only will the job losses impact on the local economy, but not re-providing a store of equivalent size will impact upon the vitality and viability of the Lee Green District Centre and the Bell Green Retail Park.

In short, whilst Sainsbury's support the redevelopment aspirations of their Lee Green and Bell Green sites, it is not clear as to whether a 'foodstore' of an equivalent size with appropriate car parking provision will be re-provided as part of the vision for the area. There is no doubt that if a foodstore of an equivalent scale to the existing provision, with adequate car parking, and that provision is not made for the continuity of trade during the construction period, the site will not be deliverable.

Furthermore, The NPPF is clear in its instruction for the need to boost and maintain the supply of housing, and that it is important that a sufficient amount and variety of land can come forward where needed (Paragraph 76). Making efficient use of land is supported by paragraph 119 in the of the NPPF, in particular promoting development of land where this would help to meet identified needs for housing. Taking this into account, the Sainsbury's Bell Green allocation should be



updated to provide a maximum amount of housing rather than the range which is currently proposed.

### CAR PARKING AND SERVICING

It is not clear from the allocation wording whether the Sainsbury’s Lee Green and Sainsbury’s Bell Green allocations will re-provide the existing level of car parking spaces. Reducing the amount of car parking as a result of the redevelopment of the site will undermine the attractiveness and accessibility the stores. Both existing Sainsbury’s stores provide parking for customers and this is particularly beneficial to those with larger families, the less mobile and vulnerable people for whom public transport, cycling or walking is not an option.

Any redevelopment also needs to include adequate servicing and operational land to enable future businesses to operate efficiently and without impediment. If the servicing is inadequate, it will make the site unacceptable for the retail and other occupiers.

In summary, the allocations should be amended to include specific reference to the re-provision of a foodstore of equivalent size with an appropriate level of adjacent car parking on site, as well as ensuring continuity of trade during the construction period. It is suggested the allocation wording be amended to the following (~~strikethrough~~ means deletion of word, **red** means new wording):

### 3. SAINSBURY’S BELL GREEN

INDICATIVE DEVELOPMENT CAPACITY	Net residential units <del>550</del> <b>Up to 1,400</b>	Gross non-residential floorspace Employment 2,751 <b>sqm</b> Main town centre 11,003 <b>sqm</b> <b>including a foodstore of an appropriate scale with associated car parking and servicing provision.</b> <b>Continuity of trade for the foodstore should be ensured during the construction period</b>
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### 4. SAINSBURY’S LEE GREEN

INDICATIVE DEVELOPMENT CAPACITY	Net residential units <del>444</del> <b>Up to 500</b>	Gross non-residential floorspace Employment 625 <b>sqm</b> Main town centre 4,123 <b>sqm</b> <b>including a foodstore of an appropriate scale with associated car parking and servicing provision</b>
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		Continuity of trade for the foodstore should be ensured during the construction period
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## SAFEGUARDED LAND AT BELL GREEN

The text supporting the Sainsbury's Bell Green allocation requires safeguarded land to support the delivery of strategic transport infrastructure, including where required for the Bakerloo line extension [paragraph 17.25.4].

It is important to recognise that a safeguarding Direction has not been confirmed for Phase 2 of the BLE (i.e the phase extending south beyond Lewisham station) [as referenced in paragraph 12.10 of the Plan]. As there is no safeguarded Direction for the BLE at the Bell Green Sainsbury's store, there is no reason to require new development to safeguard land for the BLE. Therefore, this reference should be removed. It is recommended that paragraph 17.25.4 be amended to the following:

*~~"Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension and consider options for the provision of a new railway station across the Bell Green Masterplan area, in partnership with TFL and Network Rail."~~*

## Summary

In summary, the redevelopment of Sainsbury's stores at Lee Green and Bell Green as proposed in the emerging Local Plan will have significant implications for Sainsbury's which must be taken into consideration, and if the Sainsbury's stores have to close this will lead to very significant job losses which must also be addressed.

If the allocations do not address Sainsbury's requirements regarding retaining a suitably sized store with appropriate car parking, and with the ability to have continuity of trade, the sites will not be delivered.

The Lee Green and Bell Green allocations in the emerging Local Plan should explicitly make provision for a replacement foodstore of an appropriate scale which can continue to act as an anchor for the wider vision of the site, taking into account the need for sufficient car parking and servicing. Reference to a temporary store to allow continuity of trade during the construction period should also be included in each allocation.

We hope that these representations will be incorporated in the next iteration of the Plan, and that the Council takes this opportunity to engage constructively with Sainsbury's as a major investor, employer and landowner.

We look forward to hearing from you.

Yours faithfully,

Sean McGrath



Local Plan Team  
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25 April 2023

Dear Sir or Madam,

## **LEWISHAM LOCAL PLAN: PROPOSED SUBMISSION DOCUMENT – REGULATION 19 CONSULTATION**

We write on behalf of Sainsbury's Supermarkets Ltd (SSL) in response to the consultation of the new "Lewisham Local Plan: Proposed Submission Document", under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

SSL owns the Sainsbury's store and petrol filling station at New Cross Gate, as well as the retail warehousing and associated car parking.

WSP previously submitted representations, on behalf of SSL in 2021 in response to the Regulation 18 consultation "Lewisham Local Plan: Main Issues and Preferred Approaches". We also met with the council on 27<sup>th</sup> April 2021 to discuss SSL's Regulation 18 response and we are disappointed that our previous responses do not seem to have influenced the Regulation 19 version of the plan.

We have reviewed the Regulation 19 "Lewisham Local Plan: Proposed Submission Document" document and evidence base and have set out our objection and comments below.

The Sainsbury's store continues to trade very well, with many shoppers visiting the store either on foot, by bicycle or by car. The store achieves around 1.06million transactions (or visitors) per annum. By 2024, this is estimated to increase to 1.16million transactions per annum. The store generates a gross value added (GVA) of some £8.7million per annum to the local economy. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This demonstrates that the Sainsbury's store is a major contributor to Lewisham's economy and that Sainsbury's are a key stakeholder in the Borough.

The existing Sainsbury's store is essential for the vitality for New Cross Gate. The current allocation in the New Local Plan as safeguarded land to accommodate the Bakerloo Line Extension (BLE), including a new station would have a significant negative impact on Sainsbury's business, the colleagues currently employed on site, the local economy and the local community who rely on Sainsbury's for their grocery shopping.

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SSL wholeheartedly object to the current allocation of their store at New Cross Gate and have previously objected to Transport for London's (TfL) consultations on the use of their site for the BLE, including the site's identification as a tunnelling worksite. These representations are included at **Appendix 1 & 2** for completeness. The representations to TfL's consultation should be read in conjunction with these representations because they explain why SSL's site is not an appropriate location for a new station and/or a tunnelling workshop.

### **The Allocation for the Site**

The SSL site, referred to in the new Local Plan as the 'Former Hatcham Works, New Cross Road', is currently allocated for 800 residential units, 7,550sqm of employment floorspace and 10,000sqm of 'main town centre' floorspace. The site is also allocated as the 'Bakerloo Line Safeguarding Direction'.

The allocation for 800 residential units is less than the previous iteration the Regulation 18 version of the Plan which allocated the site for 912 residential units. The identified need in both the Regulation 18 and Regulation 19 version of the Plan remains unchanged and states that the LB Lewisham have an identified housing need of 1,667 new dwellings per annum. Therefore, it is unclear as to why the Council has sought to plan for a lower level of residential units. To do so is not positive plan making and is not in accordance with paragraph 8 of the NPPF, to achieve sustainable development, and paragraph 35 of the NPPF which requires plans to be positively prepared.

Furthermore, the identification of the site as the 'Former Hatcham Works' site is misleading as it does not reflect the current use of the site. The naming of the site appears to be a deliberate attempt to obfuscate the impact of the allocation on the retail use that is fundamental to New Cross/New Cross Gate District Centre. We suggest that the site is renamed to the 'New Cross Gate Retail Park'. For clarity, we refer to the site as New Cross Gate Retail Park in these representations.

### **Our Previous Concerns Are More Pertinent Post Pandemic**

The concerns which we have expressed to TfL and Lewisham Council have never been addressed. They are legitimate concerns and undermine the soundness of the emerging Local Plan. For ease, we re-state our concerns and objections below.

In addition, our concerns that there is no credible business case for the BLE are even more pertinent post the Covid 19 pandemic because travel and working patterns in London have changed significantly which further calls into question the need for the BLE, and TfL's finances are precarious.

TfL data (Transport for London Quarterly Performance Report Quarter 3 2022/23 – )<sup>18th</sup> September – 10<sup>th</sup> December 2022) suggests that total journeys across the TfL network are down on the pre-covid baseline (2018/19) from 2,787 million to 2,252 million at the time of the report, a decrease of 20% and journeys on the London Underground network are 19% down on the pre-covid baseline.

This reduction in journeys is having an impact on TfL's finances and will impact upon TfL's ability to be able to deliver infrastructure projects such as the BLE. Total passenger income for the year to date up to Q3 2022/23 was £2.9 billion compared to the same period in 2019/20 which generated £3.4 billion in passenger income.

The consensus view is that the changes to the way we work, with more home working, and flexible working hours means that working travel patterns will not return to pre-pandemic levels.

We raised concerns pre-pandemic, the financing, and the need for the BLE had not been properly considered by TfL.

This failing is reinforced further in a post-pandemic world given the trends highlighted by TfL's performance reporting and there is absolutely no evidence that there is a need for the BLE, and no certainty that TfL will be able to finance the BLE in the medium or even the long term.

Indeed, it has been well publicised that passenger journeys on the Elizabeth Line are far exceeding expectation, and it is now the 5<sup>th</sup> busiest railway in the whole of the UK. It is also understood that the Elizabeth Line has reduced the demand on other lines, and this further calls into question the need for, and the cost effectiveness of the BLE.

In short, pre-pandemic, the justification for the BLE was threadbare and the prospects of it being funded was at best, dubious. In the post-pandemic world, there is simply no justification, and no realistic hope that it will be funded.

This is the context in which safeguarding the Sainsbury's site to accommodate the BLE must be viewed. Sainsbury's want to release significant investment and regeneration that will deliver a new foodstore and over 1,000 new homes on the site. If the Council could face into the reality that the BLE will not be delivered in the foreseeable future, if ever, because there is no business case and no need, it could deliver tangible and far-reaching benefits for the local community and New Cross/New Cross Gate District Centre.

### Bakerloo Line Extension (BLE)

The proposed BLE has been promoted by TfL since 2017. The proposals have undergone three rounds of consultation. SSL has submitted representations to each of these consultations (dated April 2017, December 2018 and December 2019).

Based on the published consultation information and supporting evidence, SSL strongly objected to the location of the new BLE station at New Cross Gate Retail Park and the use of the site for tunnel launching and as a works site. This objection still stands.

SSL is deeply concerned at TfL's lack of genuine consideration of the concerns raised and the rights of Sainsbury's as the landowner and long-standing employer and business within the community. SSL has engaged with TfL at each formal consultation opportunity to identify issues and concerns regarding the BLE plans in respect of New Cross Gate Retail Park.

Fundamentally, there is no robust business case for the BLE and that the choice of the New Cross Gate Retail Park for a station and as a tunnelling site will result in adverse impacts on the local community and area. Our previous representations set out further details and were supported by extensive technical evidence. As noted, a copy of our previous representations as well as the supporting technical evidence is enclosed (**Appendix 1 & 2**). However, in summary:

- There is no evidence of a robust and transparent business case for a capital intensive and disruptive infrastructure project such as the BLE. The project should be halted pending the publication of a robust business case;
- Since it is acknowledged that the delivery of a station at New Cross Gate Retail Park will force the closure of Sainsbury's store, the location of the station at New Cross Gate must be

re-consulted upon. Previous consultations assumed that Sainsbury's could continue to trade;

- The selection of New Cross Gate Retail Park as a station and tunnelling worksite location has not been robustly justified and there has not been proper consideration of alternatives which will have less impact;
- The selection of New Cross Gate Retail Park as a station and tunnelling worksite has many disadvantages which have not been properly considered or articulated. For example, the closure of the Sainsbury's store will have significant socio-economic consequences for the future of the New Cross/New Cross Gate District Centre which have not been considered;
- TfL has not appropriately and robustly considered the consequential impact upon the regeneration/development potential of New Cross Gate Retail Park to provide over 1,000 new homes and a new Sainsbury's foodstore, maintaining the continuity of trading during construction and supporting the vitality and viability of New Cross Gate/New Cross District Centre;
- TfL does not appear to have fully considered other potentially viable options for locating New Cross Gate station, closer to the rest of the New Cross/New Cross Gate District Centre, including on the Goodwood Road site;
- TfL does not appear to have seriously considered alternative tunnelling worksites to New Cross Gate Retail Park. For example, the Wearside Road Depot is a more appropriate tunnelling worksite;
- The impact of the tunnelling worksite on a Site of Importance for Nature Conservation (SINC) has not been assessed;
- There is no evidence that a Strategic Environmental Assessment (SEA) has been prepared to holistically evaluate the effects of the BLE proposals on the environment and social, cultural and economic circumstances; and
- There is no evidence that TfL has undertaken a robust cost benefit analysis of the BLE proposal, or indeed that there is a robust business case that justifies the significant public expenditure.

#### Safeguarding of the Site for the BLE

SSL strongly object to their site being identified as a tunnelling worksite by TfL and the site's selection as the location for New Cross Gate Station. The allocation of the New Cross Gate Retail Park to accommodate the BLE will have significant and unacceptable consequences for the existing Sainsbury's store, its employees, and the community which it serves. The allocation results in the loss of the regeneration opportunity presented by the site and the loss of any positive impact on the wider New Cross/New Cross Gate District Centre.

The extent of this lost opportunity is demonstrated by the joint planning application that SSL submitted with London Property Developers, Mount Anvil in 2019. The planning application sought to deliver 1,161 homes on the site across two phases, as well as a replacement supermarket, commercial space, placemaking and infrastructure. The Council validated the planning application on 24 January 2020 (LPA Ref: DC/19/114283). However, the application was subsequently withdrawn on 27 February 2020 due to the ongoing uncertainty around the BLE which has blighted the site.

Despite this, SSL remains committed to delivering new housing and investment immediately if the allocation for a new station and tunnelling worksite is lifted.

As a substantial and highly accessible site, with a PTAL rating of 6, New Cross Gate Retail Park offers a valuable regeneration opportunity with excellent potential for contributing to the delivery of much-needed high quality housing. SSL is confident that the site could accommodate more housing than the allocation proposes, given its experience elsewhere where densities more than 350 units per hectare have been achieved on sites with a lower PTAL than the New Cross Gate Retail Park site. SSL's proposals can deliver significant beneficial development and investment which will be lost should the site be safeguarded for BLE works.

### The Location of New Cross Gate Station

The supporting text for the allocation states that the redevelopment will enable the delivery of new and improved transport infrastructure, including a new station to accommodate the Bakerloo line extension.

As set out in our previous representations, the choice of New Cross Gate Retail Park is referred to in TfL's Stations Overview consultation document (2019) as follows:

*"In the 2017 consultation we consulted on our proposed site for the station being the site of the retail park lying on the west side of the existing New Cross Gate Rail station. A majority of respondents expressed support for this proposal."*

We can find no further or fuller explanation as to why New Cross Gate Retail Park has been chosen by TfL. There does not appear to be any strategic environmental assessment (SEA) undertaken by TfL or any in-depth evidence-based analysis, including a cost/benefit analysis to justify this selection.

Furthermore, it is misleading to state that a majority of respondents expressed support for the proposal. At that time, TfL did not acknowledge that the existing Sainsbury's store will need to close as a result.

Several stakeholders including local councillors (Cllr Charlie Davis and Cllr Liz Johnston-Franklin) have expressed concern over the loss of the Sainsbury's store, particularly in conjunction with the Tesco store in Old Kent Road, including the increased journeys to other supermarkets and the impacts of the closures as local employers.

Finally, none of the TfL consultations have provided any information on how the buses which currently use the Sainsbury's site would be relocated during the construction period of the station. This is a matter about which local people will want to be informed.

SSL does not believe that there has been adequate and effective consultation on the location of the station by TfL and the significant socio-economic and retail impacts of the loss of the Sainsbury's store have not been addressed. If the new Local Plan allocates the site for a new station, it will be incumbent upon the Council to undertake this work.

The location of the station at New Cross Gate Retail Park as an interchange would be inefficient compared to the Goodwood Road site which is allocated in the Regulation 19 version of the Plan for 1,050sqm main town centre uses, 3,550sqm employment uses and 167 residential units. Furthermore, this site is better located in relation to New Cross District Centre and Goldsmiths University, so reducing travel distances and journey times when changing trains.

### Impact of the Closure of Sainsbury's

The economic impact of the closure of the Sainsbury's store is outlined in full in our previous consultation response which is enclosed in **Appendix 1**. In summary:

- Given the level of deprivation experienced within the New Cross Gate area, it is apparent that the removal of the Sainsbury's store in its current format will detrimentally impact the community and potentially worsen its relative deprivation;
- The employment created by the existing Sainsbury's store generates gross value added (GVA) of some £8.7million per annum. Therefore, removing this would have a significant impact on the local economy;
- The social value of the store to be £4.8million per annum and so the loss of this would have a significant economic impact;
- The current Sainsbury's store accounts for approximately 70% of the District Centre's convenience turnover generates approximately £55m in convenience turnover;
- The importance of local retail and access to food become even more stark during the COVID-19 pandemic. Whilst the pandemic has altered the way people shop and the demand for online retail is growing, the provision of a supermarket in this location is vitally important for the vitality and viability of the District Centre and the local community; and
- The loss of the Sainsbury's store will have significant implications in terms of access to essential grocery needs for many residents.

The impact of the closure of the Sainsbury's store and the existing retail warehouses on New Cross/ New Cross Gate District Centre is a legitimate planning concern that must be taken into consideration as the new Local Plan process.

Furthermore, in the absence of a credible business case for the BLE and with TfL's finances in a precarious position post pandemic, it is unlikely that the BLE will happen, even in the long term.

By coupling the draft Local Plan to the illusory hope that the BLE will happen during the plan period, the Council is sterilising a sustainable development site that can deliver hundreds of homes, new jobs and major investment that will regenerate New Cross/ New Cross Gate District Centre and the wider area.

We trust that these representations will be fully considered by the Council, and that the next iteration of the new Local Plan amended accordingly to ensure that SSL's New Cross Gate Retail Park site can be brought forward for much needed regeneration in the short term.

We would welcome the opportunity to discuss this further in due course but in the meantime, if you require any further information, please do not hesitate to contact me.

Yours faithfully,



Sean McGrath

# Appendix 1





Local Plan  
Lewisham Planning Policy  
London Borough of Lewisham  
Laurence House  
1 Catford Road, Catford  
London  
SE6 4RU

Our Ref: 70081726

9 April 2021

Dear Sir or Madam,

### **LEWISHAM LOCAL PLAN: MAIN ISSUES AND PREFERRED APPROACHES – REGULATION 18 CONSULTATION**

1. We write on behalf of Sainsbury's Supermarkets Ltd (SSL) in response to the consultation of the new "Lewisham Local Plan: Main Issues and Preferred Approaches", under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. SSL owns the Sainsbury's store and petrol filling station at New Cross Gate, as well as the retail warehousing and associated car parking. SSL objects to the proposed current allocation in the new Local Plan as safeguarded land to accommodate the Bakerloo line Extension (BLE), including a new station. SSL have previously strongly objected to Transport for London's (TfL) consultations on the use of their site for the BLE, including the site's identification as a tunnelling worksite.
3. We have reviewed the Regulation 18 "Lewisham Local Plan: Main Issues and Preferred Approaches" document and evidence base and have set out our comments below.

#### **The Allocation of the Site**

4. The SSL site, referred to in the new Local Plan as the 'Former Hatcham Works, New Cross Road', is currently allocated for 912 residential units, 4,560sqm of employment floorspace and 18,240sqm of 'main town centre' floorspace. The site is also allocated for "*new and improved transport infrastructure, including land and facilities required to accommodate the Bakerloo line extension*".
5. The identification of the site as the 'Former Hatcham Works' site is misleading as it does not reflect the current use of the site. The naming of the site appears to be a deliberate attempt to obfuscate the impact of the allocation on the retail that is fundamental to New Cross/New Cross Gate District Centre. We suggest that the site is renamed to the 'New Cross Gate Retail Park' in later versions of the Local Plan. For clarity, we refer to the site as New Cross Gate Retail Park in these representations.
6. The proposed BLE has been promoted by TfL since 2017. The proposals have undergone three rounds of consultation. SSL has submitted representations to each of these consultations (dated April 2017, December 2018 and December 2019).

7. Based on the published consultation information and supporting evidence, SSL strongly objected to the location of the new BLE station at New Cross Gate Retail Park and the use of the site for tunnel launching and as a works site. This objection still stands.
8. SSL is deeply concerned at TfL's lack of genuine consideration of the concerns raised and the rights of Sainsbury's as the landowner and long-standing employer and business within the community. SSL has engaged with TfL at each formal consultation opportunity to identify issues and concerns regarding the BLE plans in respect of New Cross Gate Retail Park. Detailed objections have been submitted, supported by extensive technical evidence set out as follows:
  - A Socio-economic Assessment, prepared by WSP (formerly WSP | Indigo) (**Appendix A**);
  - A Retail Impact Assessment, prepared by WSP (formerly WSP | Indigo) (**Appendix B**);
  - Tunnel engineering advice provided by Dr Sauer and Partners (**Appendix C**); and
  - A Transport Appraisal prepared by Intermodality (**Appendix D**).
9. In making detailed representations, SSL has previously identified fundamental short, medium and long-term adverse impacts that will affect their site at New Cross Gate and the New Cross/New Cross Gate District Centre and the credibility of the BLE proposals.
10. The December 2019 consultation was the first time the location of the New Cross Gate station was explicitly included in the public consultation and TfL acknowledges that the store will have to close as a result of the BLE proposals. In previous public consultations, TfL indicated that the store could continue to trade.
11. SSL remains firmly of the view that the previous TfL consultation responses were made based on misleading and incomplete information which failed to fully convey the impact of the new station being located at New Cross Gate Retail Park. It appears that the allocation in the new Local Plan reflects TfL's preferred strategy and has not considered the impacts of the permanent closure of the Sainsbury's store on (inter alia) the vitality and viability of New Cross/New Cross Gate District Centre and the socio-economic impacts of the associated job losses.
12. The BLE is central to the new Local Plan and its spatial strategy. Therefore, in order for the Local Plan to meet the soundness tests required, the Council needs to be certain on the deliverability of the BLE and the sites TfL has chosen for stations and tunnelling.
13. SSL has provided clear evidence which demonstrates, not only that there is no robust business case for the BLE, but that the choice of the New Cross Gate Retail Park for a station and as a tunnelling site will result in adverse impacts on the local community and area.
14. In summary, SSL's concerns are as follows:
  - There is no evidence of a robust and transparent business case for a capital intensive and disruptive infrastructure project such as the BLE. The project should be halted pending the publication of a robust business case;
  - Since it is acknowledged that the delivery of a station at New Cross Gate Retail Park will force the closure of Sainsbury's store, the location of the station at New Cross Gate must

be re-consulted upon. Previous consultations assumed that Sainsbury's could continue to trade;

- The selection of New Cross Gate Retail Park as a station and tunnelling worksite location has not been robustly justified and there has not been proper consideration of alternatives which will have less impact;
- The selection of New Cross Gate Retail Park as a station and tunnelling worksite has many disadvantages which have not been properly considered or articulated. For example, the closure of the Sainsbury's store will have significant socio-economic consequences for the future of the New Cross/New Cross Gate District Centre which have not been considered;
- TfL has not appropriately and robustly considered the consequential impact upon the regeneration/development potential of New Cross Gate Retail Park to provide over 1,000 new homes and a new Sainsbury's foodstore, maintaining the continuity of trading during construction and supporting the vitality and viability of New Cross Gate/New Cross District Centre;
- TfL does not appear to have fully considered other potentially viable options for locating New Cross Gate station, closer to the rest of the New Cross/New Cross Gate District Centre, including on the Goodwood Road site;
- TfL does not appear to have seriously considered alternative tunnelling worksites to New Cross Gate Retail Park. For example, the Wearside Road Depot is a more appropriate tunnelling worksite;
- The impact of the tunnelling worksite on a Site of Importance for Nature Conservation (SINC) has not been assessed;
- There is no evidence that a Strategic Environmental Assessment (SEA) has been prepared to holistically evaluate the effects of the BLE proposals on the environment and social, cultural and economic circumstances; and
- There is no evidence that TfL has undertaken a robust cost benefit analysis of the BLE proposal, or indeed that there is a robust business case that justifies the significant public expenditure.

### **Safeguarding of the Site for the BLE**

15. Through their ongoing engagement in the consultation process for the proposed BLE, SSL have reiterated their support in principle for the BLE, **provided the business case is proven**. However, SSL strongly object to their site being identified as a tunnelling worksite by TfL and the site's selection as the location for New Cross Gate Station.
16. As explained, the allocation of the New Cross Gate Retail Park to accommodate the BLE will have significant and unacceptable consequences for the existing Sainsbury's store, its employees and the community which it serves. The allocation results in the loss of the

regeneration opportunity presented by the site and the loss of any positive impact on the wider New Cross/New Cross Gate District Centre.

17. The extent of this lost opportunity is demonstrated by the joint planning application that SSL submitted with London Property Developers, Mount Anvil in 2019. The planning application sought to deliver 1,161 homes on the site across two phases, as well as a replacement supermarket, commercial space, placemaking and infrastructure. The Council validated the planning application on 24 January 2020 (LPA Ref: DC/19/114283). However, the application was subsequently withdrawn on 27 February 2020 due to the ongoing uncertainty around the BLE which has blighted the site.
18. Despite this, SSL remains committed to delivering new housing and investment immediately if the allocation for a new station and tunnelling worksite is lifted.
19. As a substantial and highly accessible site, with a PTAL rating of 6, New Cross Gate Retail Park offers a valuable regeneration opportunity with excellent potential for contributing to the delivery of much-needed high quality housing. This is recognised in the emerging Local Plan through its allocation for approximately 912 units alongside employment and main town centre uses. SSL is confident that the site could accommodate more housing than the allocation proposes, given its experience elsewhere where densities in excess of 350 units per hectare have been achieved on sites with a lower PTAL than the New Cross Gate Retail Park site. SSL's proposals can deliver significant beneficial development and investment which will be lost should the site be safeguarded for BLE works.

#### **The Lack of a Business Case for the BLE**

20. SSL is concerned that TfL and Lewisham Council are using the new Local Plan to promote a major capital-intensive and disruptive infrastructure project, when no evidence has been provided to demonstrate a robust and transparent business case. SSL has repeatedly asked for information about overall development costs, including the costs of land acquisition and the wider socio-economic impacts on the community and New Cross/New Cross Gate District Centre, but TfL remains unwilling to discuss or disclose this. If the site is to be allocated and safeguarded in the new Local Plan, it is incumbent on the Council (with the support of TfL) to address this failing.
21. Given that HS2 and Crossrail 1 are both significantly over budget and behind schedule, and Crossrail 2 has been removed as a spending priority for the next decade, it is difficult to understand why TfL continues to press ahead with the BLE without clear evidence of a business case. Indeed, now it is acknowledged that the Sainsbury's store will be forced to close, the effect this will have on the 'business case' should be open to scrutiny.
22. As a result of the COVID-19 pandemic over the past 12 months, there has been a dramatic reduction in journeys on the TfL network which has caused a huge drop in revenue. The Mayor of London has had to request several emergency grants from Central Government in order to keep the capital's transport network running.
23. The Comprehensive Spending Review, submitted to TfL's Finance Committee on 30 September 2020, notes that passenger income fell by more than 90% compared to the previous year. A total of £1.9 billion was given by the Government to help keep the transport network running up until October 2020. The Mayor then sought a commitment of at least £5.65

billion over the remainder of 2020/21 and 2021/22, with £4.9 billion needed to allow the network to keep running and £750 million for the delivery of Crossrail, however this was not granted.

24. On 1 November 2020, TfL received a £1.8 billion bailout from the Government which secured funding until 31 March 2021. On 22 March 2021 an additional £485 million was secured up until 18 May 2021<sup>1</sup>.
25. As such, it is clear that TfL is currently living a “hand-to-mouth” existence, without the ability to secure funding for huge investment projects including the BLE.
26. As part of this Spending Review, TfL has decided that the BLE will not form part of its spending priorities in the next decade. Therefore, there is still no funding secured for the construction of the BLE and the emerging Local Plan needs to account for this uncertainty.
27. If the BLE is not to be delivered for at least the next 10 years (and with the best will, it is likely to be at least 15 years before it is under construction) then a large number of sites within Lewisham Borough will become sterile and will not be able to deliver much needed housing and regeneration in the Borough.
28. Further, there is no guarantee that the BLE will progress after 10 years so development on these sites may be pushed back for 20 or more years which will severely inhibit investment and growth.
29. Since the onset of the pandemic, there has been a significant change in travel patterns, with many people working from home. As normality returns, there will be a need to reassess public transport investment in light of reduced passenger numbers and less pressure on peak travel as people are more flexible with commuting times.
30. The December 2019 TfL consultation stated that an application to the Secretary of State for a TWAO (Transport and Works Act Order) will not be made before 2023. However, on 1 March 2021 the Department for Transport issued a safeguarding direction for the proposed route of the BLE. This includes ‘Area of Surface Interest’, which includes the whole of the Sainsbury’s site and ‘Area of Subsurface Interest’ which includes the southwest corner of the site.
31. The safeguarding direction does not contain any review or expiry date which creates great uncertainty for landowners, staff employed on the site and the local community, particularly when there is still uncertainty about funding for the BLE and its delivery, even in the long term.
32. To prevent the redevelopment of an available and deliverable brownfield site is unacceptable. There is no certainty that the BLE will ever be delivered. It has no timescale for delivery and no funding.
33. In short, the allocation for the BLE station should be removed until the business case is proven. The desire to accommodate the BLE should not prohibit the significant and immediate redevelopment of the site which would bring substantial benefits to the local community and the Borough as a whole.

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<sup>1</sup> <https://tfl.gov.uk/info-for/investors/announcements>

### **The Location of New Cross Gate Station**

34. At paragraph 15.58 it is noted that the site can accommodate a new station for the BLE. There is simply no evidence or justification as to why the New Cross Gate Retail Park site is an appropriate site for a new station.
35. The choice of New Cross Gate Retail Park is referred to in TfL's Stations Overview consultation document (2019) as follows:
- "In the 2017 consultation we consulted on our proposed site for the station being the site of the retail park lying on the west side of the existing New Cross Gate Rail station. A majority of respondents expressed support for this proposal."*
36. We can find no further or fuller explanation as to why New Cross Gate Retail Park has been chosen by TfL. There does not appear to be any strategic environmental assessment (SEA) undertaken by TfL or any in-depth evidence based analysis, including a cost/benefit analysis to justify this selection.
37. Furthermore, it is misleading to state that a majority of respondents expressed support for the proposal. At that time, TfL did not acknowledge that the existing Sainsbury's store will need to close as a result.
38. Several stakeholders including local councillors (Cllr Charlie Davis and Cllr Liz Johnston-Franklin) have expressed concern over the loss of the Sainsbury's store, particularly in conjunction with the Tesco store in Old Kent Road, including the increased journeys to other supermarkets and the impacts of the closures as local employers.
39. London First, who represent a number of businesses, and Goldsmiths University have also expressed concern over the plans at New Cross Gate. The Civil Service Pensioners Alliance is concerned over the loss of the Sainsbury's store and the impact of a lack of large supermarkets in the area which would result from the works at this site.
40. Finally, none of the TfL consultations have provided any information on how the buses which currently use the Sainsbury's site would be relocated during the construction period of the station. This is a matter about which local people will want to be informed.
41. SSL does not believe that there has been adequate and effective consultation on the location of the station by TfL and the significant socio-economic and retail impacts of the loss of the Sainsbury's store have not been addressed. If the new Local Plan allocates the site for a new station, it will be incumbent upon the Council to undertake this work.
42. The location of the station at New Cross Gate Retail Park as an interchange would be inefficient compared to the Goodwood Road site which is better located in relation to New Cross District Centre and Goldsmiths University, so reducing travel distances and journey times when changing trains.

### **The Goodwood Road Site**

43. Goodwood Road is allocated for a mixed-use scheme including 112 new houses. SSL are firmly of the view that this is a more appropriate and suitable site for a station for the BLE.
44. Not only will the Goodwood Road site allow for a better interchange between the BLE and rail and bus services, it is a more appropriate station location because:

- it will have significantly less social and economic impacts, and less cost;
- it has been vacant for many years and is deliverable;
- it has better access to other services within the New Cross/New Cross Gate District Centre;
- it will, through Goodwood Road, have an acceptable access route which would not undermine the surrounding highways network;
- it will have the least impact in terms of job losses;
- it will have the least impact on the local community because there will be no loss of key shopping facilities;
- it will have the least impact in terms of the loss of delivery of new homes;
- it will have the least impact upon the vitality and viability New Cross/New Cross Gate District Centre; and
- it will allow a vital regeneration scheme to come forward at New Cross Gate Retail Park which will deliver a new Sainsbury's store (with no closure during the development phase). SSL's site will deliver at least 912 new homes compared to 112 at Goodwood Road.

45. In short, the most sustainable and appropriate location for a new station for the BLE is the Goodwood Road site. This site should be identified as the preferred location for a new BLE station.

#### **A Tunnelling Worksite at New Cross Gate Retail Park**

46. TfL's preferred location for a tunnelling work site is the New Cross Gate Retail Park site. The new Local Plan does not mention this, only that the site is allocated for 'land and facilities required to accommodate' the BLE. If the intention is that the site is to be a tunnelling work site, this should be made clear in the new Local Plan. There has not been an objective and transparent assessment of the tunnelling worksite location alternatives.
47. Leaving aside the socio-economic impacts of the site being used as a tunnelling work site, SSL also have technical concerns about the appropriateness of the New Cross Gate Retail Park site.
48. A technical note from Dr Sauer and Partners (DSP) is provided at **Appendix C**. This addresses the tunnelling worksite proposals within the current consultation. It confirms that there is no over-riding technical reason as to why the worksite is 'best' located at New Cross Gate Retail Park. Indeed, the opposite is true as the opportunity to move spoil by rail from New Cross Gate Retail Park is very limited.
49. However, DSP confirm that there is an option to accommodate the tunnelling worksite at the Wearside Road Depot, which has been dismissed by TfL due to its size (based upon an arbitrary size of 2.4ha). DSP demonstrate that the site could be expanded beyond the area considered by TfL to provide a suitably sized site, based on TfL's criteria. Indeed, due to the availability of more trains in this location, DSP also identify that the required site size at the Wearside Road Depot could be smaller than that proposed at New Cross Gate Retail Park, as the requirement for spoil stockpiling and storage of tunnel segments would be less with the enhanced accessibility by rail of the Wearside Road Depot site.
50. DSP also confirm that the location of a tunnel launching site at the Wearside Road Depot could significantly reduce the tunnel boring construction programme as it provides far greater

locational efficiencies in terms of the requirements for assembly and disassembly of tunnel boring machines.

51. Further technical work has been undertaken by Intermodality. Intermodality have had regard to the implications on the rail network of the associated freight movements required to remove spoil and allow for the loading and unloading of materials. The Intermodality Assessment is provided in full at **Appendix D**.
52. In summary, Intermodality have identified critical gaps in the consideration of worksite options by TfL which undermine the selection of New Cross Gate Retail Park as the primary preferred tunnelling worksite option and raise serious questions over the robustness of TfL's approach.
53. The New Cross Gate Retail Park site sits within a heavily congested part of the London rail network, with very limited slack in the daily scheduling. Heavy freight movements are necessarily slow and have the potential to severely disrupt passenger services.
54. Intermodality confirm that both Wearside Road Depot and Hither Green sites have the potential to be better worksite options because they are located where there is greater network capacity to accommodate freight movements and onward connections to facilitate the disposal of spoil.
55. Furthermore, the capacity of the site to accommodate storage of spoil and other materials is not confirmed; and the risk of interruption to passenger services is far greater, with the associated implications for the surrounding network far more severe.
56. Finally, the tunnelling worksite at New Cross Gate Retail Park will require development of a Site of Importance for Nature Conservation (SINC). The impact on this protected site has not been assessed.
57. It is clear from this work that there are at least two more appropriate sites at Hither Green and Wearside Road. Both represent better alternatives with respect to surrounding rail network capacity and opportunity to overcome constraints.
58. Wearside Road Depot is currently not allocated in the new Local Plan.
59. The analysis by DSP and Intermodality confirms that the Wearside Depot is a better tunnelling worksite than the New Cross Gate site because:
  - it is located at the southern end of the BLE and thereby allowing the tunnel boring machines to have two drives rather than four if the tunnels were launched from New Cross Gate Retail Park. This has significant construction programme implications;
  - it is better located to facilitate the removal of spoil by rail, being on a less congested part of the network;
  - it would have fewer environmental impacts as trains would not be restricted to night-time movements only, and
  - it would not sterilise a valuable regeneration site with advanced redevelopment plans.
60. For these reasons, if the new Local Plan does make allowance for the BLE, the Wearside Road Depot should be safeguarded and allocated as a tunnelling site.



## The Economic Impact of Closure of Sainsbury's

61. The Stations Overview consultation document which formed part of the December 2019 TfL consultation, confirms that TfL is proposing a new station at New Cross Gate Retail Park. It goes on to confirm that:

*“At the last consultation we stated that there could be a potential loss of the Sainsbury's supermarket during the construction period. As we have developed our plans for the site to incorporate the primary tunnelling worksite, it has become clearer that the current supermarket, other retailers and petrol station would not be able to remain operational on the site during construction.”*

62. It is clear that the allocation of this site for land and facilities to accommodate the BLE will mean that the businesses at New Cross Gate Retail Park will be forced to close<sup>2</sup>. This will have significant negative impact on: Sainsbury's business; the people currently employed on the site; the regeneration of the area in the short term; the wider community; and New Cross/New Cross Gate District Centre.

63. The socio-economic implications of the loss of the Sainsbury's store are explained in full technical detail at **Appendix A**.

64. The socio-economic analysis confirms that the Sainsbury's store and the area surrounding it is within Lewisham's lower super-output areas (LSOAs) that have been assessed as some of the most deprived in England. The existing Sainsbury's store is found to contribute positively to each of the seven domains which constitute the English Indices of Deprivation, including:

- Income deprivation;
- Employment deprivation;
- Education, skills and training deprivation;
- Health deprivation and disability;
- Crime;
- Barriers to housing and services; and
- Living environment deprivation.

65. Given the level of deprivation experienced within the New Cross Gate area, it is apparent that the removal of the Sainsbury's store in its current format will detrimentally impact the community and potentially worsen its relative deprivation.

66. It is further estimated that the employment created by the existing Sainsbury's store generates gross value added (GVA) of some £8.7million per annum. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This significant figure demonstrates the major contribution of the Sainsbury's store to Lewisham's economy.

67. The analysis also estimates the additional value generated beyond labour productivity. This is referred to as social value, which represents a holistic evaluation of social, environmental and

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<sup>2</sup> Stations Overview consultation document which formed part of the December 2019 TfL consultation.

economic effects. Using a national framework for measuring social value, the socio-economic analysis estimates the social value of the store to be £4.8million per annum.

68. These figures are noteworthy given the evident deprivation experienced in the immediate New Cross Gate area, demonstrating the positive contribution of the store to the local community. The removal of the Sainsbury's store in its current format at New Cross Gate will be detrimental and undoubtedly lead to negative socio-economic impacts within the local community.
69. The importance of local retail and access to food has become even more stark during the COVID-19 pandemic. Whilst the pandemic has altered the way people shop and the demand for online retail is growing, we consider that the provision of a supermarket in this location is vitally important for the area and local community.
70. The socio-economic analysis further identifies that there would be an opportunity cost of not delivering redevelopment proposals at the New Cross Gate Retail Park site which will be delayed indefinitely if the site is allocated for the BLE station. It quantifies this as follows:
  - Gross Added Value of £10.9million per annum, representing an increase of £2.2million per year compared to current operations. Consequently, the cessation of the redevelopment plans and removal of the current store operations would see a loss of over £11 million each year. This is a conservative figure as it fails to account for other jobs that would be lost from other businesses operating in the immediate area who rely on the Sainsbury's store as an 'anchor store' for the New Cross/New Cross Gate District Centre;
  - The important contribution of the proposals to local housing need targets and the boost to local population which would generate circa £3.6 million for convenience expenditure and £6.5 million in comparison expenditure available to be spent within the New Cross/New Cross Gate District Centre;
  - The boost to the New Cross/New Cross Gate District Centre turnover through an enhanced store, expanded Groceries Online (GOL) services and improved links with the adjoining District Centre. The enhanced GOL services (which have now been consented under LPA ref. DC/20/118401) are estimated to improve store turnover by £11m as well as having considerable sustainability benefits, including the reduction in car use and the flow on impacts of this on traffic, road incidents and air quality in the local area;
  - Improvement in the shopping environment allowing for positive impacts on the New Cross/New Cross Gate District Centre;
  - Continued promotion of active transport through the convenience offered by an accessible supermarket located within the surrounding neighbourhood; and
  - Additional job creation through the construction required for the scheme.
71. In summary, the benefits associated with the regeneration of the New Cross Gate Retail Park site are extensive and would directly benefit the local economy, increase the housing stock and enhance community accessibility to vital services and infrastructure.
72. Following consideration of the published information relating to options assessments, including station site selection undertaken by TfL, the socio-economic assessment concludes that

although work has been undertaken by TfL to assess the costs and benefits of the BLE project and the location of the New Cross Gate station, the research and subsequent analysis does not account for the wider value and contribution to the local community of the existing Sainsbury's store. In particular, it fails to capture the potential benefits of the Sainsbury's redevelopment proposals which seek to drive additional value to the local community as explained above.

### The Retail Impact of Closure of Sainsbury's Store

73. Concern over the loss of the retail facilities at the Sainsbury's site in New Cross Gate have been raised in previous TfL consultations, not only from SSL, but from members of public in response to the consultation process.
74. This issue has been examined in greater technical detail by WSP (formerly WSP | Indigo), who have undertaken a detailed Retail Impact Assessment (RIA) in October 2019. The RIA is appended in full at **Appendix B**.
75. Assessing the impact of a number of scenarios, the RIA determines that the worst-case scenario for the New Cross/New Cross Gate District Centre is the loss of the Sainsbury's store for ten plus years. **This would result in the reduction of the District Centre's turnover by some £55m, an impact of -73%**. This is undoubtedly a significant adverse impact in terms of the performance of the District Centre that will fundamentally undermine its role and function within the retail hierarchy and seriously impact on its health, vitality and viability.
76. Furthermore, the RIA identifies that the loss of the Sainsbury's store will have significant implications in terms of access to essential grocery needs for many local residents, particularly those who rely on public transport; loss of jobs, which will also largely be felt by local residents; the unsustainable shopping patterns it will create, and the adverse highways impacts as a consequence of the closure of a popular store, diverting demand and trips to more distant stores<sup>3</sup>; and the loss of in-store facilities and opportunities, including the pharmacy, Explore Learning and the local charitable benefits that are delivered through Sainsbury's commitment to supporting their local communities.
77. The pandemic has shown how important it is for the community to have access to affordable food and essential products, in close proximity to where they live. Stores such as the New Cross Gate Sainsbury's are more important than ever as they provide a huge range of products and are situated at the heart of the community, within the District Centre.
78. The range and extent of quantitative and qualitative impacts identified represent a fundamental conflict with national and local planning policy (including the NPPF and the adopted London Plan) to support town centres, facilitating their growth, diversification and adaptation to meet the needs of their local communities.
79. The Council's retail evidence base, the Lewisham Retail Capacity Study 2019 Update supports the findings of the RIA at Appendix B. The Retail Study Update recognises the importance of the existing Sainsbury's store in New Cross/New Cross Gate District Centre. Paragraph 2.20 of the Retail Study Update states that the household survey found that the Sainsbury's store was one of the most popular destinations for convenience goods shopping for residents in the

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<sup>3</sup> Indeed, TfL's current proposals for Old Kent Road 1 anticipate the closure of the Tesco supermarket on the Old Kent Road further reducing choice and competition for shoppers.

survey area, recognising that it is a well-used store helping to meet the shopping needs of local residents<sup>4</sup>. As such, the redevelopment of the site would mean that those residents who currently shop at the store would have to travel to stores further afield to undertake their main food shopping.

80. Furthermore, Table 5 of the Retail Study Update highlights the importance of the Sainsbury's store to the vitality and viability of the New Cross/New Cross Gate District Centre. Table 5 shows that the current Sainsbury's store accounts for approximately 70% of the District Centre's convenience turnover. As such, the loss of the Sainsbury's store will significantly reduce the turnover of the District Centre and have a significant adverse impact upon it.
81. For these reasons the loss of the Sainsbury's store will directly conflict with the new Local Plan Policy EC10: Town Centre at the Heart of Our Communities.
82. In summary, the detailed technical work that has been undertaken on behalf of the developers confirms that the retail impact of the loss of the Sainsbury's store and existing retail warehouses will have substantial negative short-, medium- and long-term implications for the local community. These findings are supported by the Council's own retail evidence base.
83. The impact of the closure of the Sainsbury's store and the existing retail warehouses on New Cross/ New Cross Gate District Centre is a legitimate planning concern that must be taken into consideration as part of the new Local Plan process.

#### **Amendments to the Local Plan**

84. As it will be at least 10 years before BLE considered for funding, there is a strong case for reference to the BLE to be removed from the Local Plan, given that it will blight regeneration and redevelopment that will otherwise come forward in the next 10 years.

#### **Former Hatcham Works, New Cross Road**

85. The site should be identified as New Cross Gate Retail Park, or the Sainsbury's site. The reference to the Former Hatcham Works is misleading for the reasons set out above.
86. The reference to the BLE should be removed from the allocation. The site should be allocated for mixed use development to provide a new Sainsbury's store, a minimum of 912 new homes and employment and 'main town centre' floorspace for delivery in the first five years of the new Plan period.

#### **Goodwood Road and New Cross Road**

87. If reference to the BLE is to be retained in the new Local Plan, the Goodwood Road and New Cross Road site should be allocated to accommodate a new station to serve the BLE. Wearside Road Depot.
88. If reference to the BLE is to be retained in the new Local Plan, the Wearside Road Depot<sup>5</sup> site should be safeguarded or allocated as a tunnelling work site for the BLE.

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<sup>4</sup> The Retail Study Update 2019 indicates that the Sainsbury's store is under-trading (see Table 6), but Sainsbury's own trading information shows that the store is performing well, with the potential to perform even better.

<sup>5</sup> The Wearside Road Depot is safeguarded under the Department for Transport safeguarding direction for the proposed route of the BLE, issued on 1 March 2021.



89. We trust that these representations will be fully considered by the Council, and that the next iteration of the new Local Plan amended accordingly to ensure that SSL's New Cross Gate Retail Park site can be brought forward for much needed regeneration in the short term.

90. We will contact the Council in due course to discuss these representations, but in the meantime, if you require any further information, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Sean McGrath'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Sean McGrath  
Director

cc B Moore, SSL



# Briefing Note



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## Cost Benefit Analysis for Bakerloo Line Extension

### Introduction

1. This briefing note outlines the feasibility studies that have been undertaken for the Bakerloo Line Extension (BLE) project. Since 2014, Transport for London (TfL) has presented business cases for different aspects of the BLE project. These are outlined below:
  - In September 2014, TfL published a *Background to Consultation*<sup>1</sup> document to inform its first round of consultation that primarily focused on route alignment options.
  - In response to a Freedom of Information request made in October 2014, TfL released a *Business Case and Planning Summary*<sup>2</sup> document from February 2014 that summarised cost-benefit analysis results. Subsequently, this document became a supplement to the September 2014 *Background to Consultation* document.
  - In December 2015, TfL published an *Option Selection Summary Report* and an *Options Assessment Report*<sup>3</sup>
  - In February 2017, TfL published an updated *Background to Consultation Report*<sup>4</sup> to inform its second round of consultation. This focused on station site selection and alignment and was accompanied by a factsheet for the New Cross Gate Station.
  - In May 2019, the London Borough (LB) of Lewisham produced a detailed *New Cross Area Framework*<sup>5</sup> in conjunction with TfL and the GLA which provided further analysis of the existing New Cross Gate site and station alignment options.

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<sup>1</sup> TfL (2014) *Bakerloo Line Extension: Background to Consultation* [Online]. Available from: [https://consultations.tfl.gov.uk/tube/bakerloo-extension-2014/user\\_uploads/bakerloo-line-extension--background-to-consultation---amended.pdf](https://consultations.tfl.gov.uk/tube/bakerloo-extension-2014/user_uploads/bakerloo-line-extension--background-to-consultation---amended.pdf) (Accessed 3 December 2019)

<sup>2</sup> TfL (2014) *Bakerloo Line Extension – Summary of Business Case and Planning Scenario Work 3 January 2014 (updated 4 February 2014)* [Online]. Available from: <https://www.whatdotheyknow.com/request/235907/response/592067/attach/3/Business%20Case%20and%20Planning%20Summary.pdf> (Accessed 3 December 2019)

<sup>3</sup> TfL (2015) *Bakerloo Line Extension: Option Selection Summary Report* [Online]. Available from: [https://consultations.tfl.gov.uk/tube/bakerloo-extension-2014/user\\_uploads/options-selection-summary-report-january-2016.pdf](https://consultations.tfl.gov.uk/tube/bakerloo-extension-2014/user_uploads/options-selection-summary-report-january-2016.pdf) (Accessed 3 December 2019)

<sup>4</sup> TfL (2017) *Bakerloo Line Extension Background to 2017 Consultation: February 2017* [Online]. Available from: [https://consultations.tfl.gov.uk/tube/bakerloo-extension-2017/user\\_uploads/background-to-consultation-report-updated.pdf](https://consultations.tfl.gov.uk/tube/bakerloo-extension-2017/user_uploads/background-to-consultation-report-updated.pdf) (Accessed 3 December 2019)

<sup>5</sup> London Borough of Lewisham (2019) *New Cross Area Framework* [Online]. Available from: <https://lewisham.gov.uk/inmyarea/regeneration/deptford/a-new-vision-for-new-cross> (Accessed 3 December 2019)

- In October 2019, TfL published the *Background to Consultation Summary Report*<sup>6</sup> for its third and most current consultation period. Informed by the LB Lewisham options analyses, the report primarily focuses on the main tunnelling worksites and constructability.
2. The information provided in the documents relating to the use of the New Cross Gate site as part of the BLE project is extensive. This briefing note aims to highlight key arguments presented in these documents in order to demonstrate the context of the decision-making that has occurred to date.

### BLE route alignments

3. In 2014, two main route alignment options were considered between Elephant and Castle and New Cross Gate by TfL. These options were as follows:
  - Option 1: alignment through Old Kent Road
  - Option 2: alignment further south, to travel through Camberwell and Peckham Rye.
4. A benefit/cost ratio was calculated for each option by TfL as demonstrated in Figure 1 below.

All £ millions						
	Build + renewal	Operating	Revenue	Net Financial	Benefits	Ratio
Option 1	£2,174	£729	£322	£2,582	£8,472	3.3: 1
Option 2	£2,597	£816	£320	£3,094	£8,184	2.6: 1

Figure 1 Benefit/cost ratio calculations for route alignment options (TfL Background to Consultation Report 2014)

5. Through the assessment undertaken in Figure 1, Option 1 was assessed as being stronger, mainly because of the reduced journey times the route would have to central London, along with lower construction costs as a result of a shorter tunnelling section. Despite this, the report states *“they do both, however, present a very strong case”*<sup>7</sup>.

<sup>6</sup> TfL (2019) *Bakerloo Line Extension: Background to Consultation Summary Report October 2019* [Online]. Available from: [https://consultations.tfl.gov.uk/tube/bakerloo-extension/user\\_uploads/background-summary-report.pdf](https://consultations.tfl.gov.uk/tube/bakerloo-extension/user_uploads/background-summary-report.pdf) (Accessed 3 December 2019)

<sup>7</sup> TfL (2014) *Bakerloo Line Extension – Summary of Business Case and Planning Scenario Work 3 January 2014 (updated 4 February 2014)*, p.3 [Online]. Available from: <https://www.whatdotheyknow.com/request/235907/response/592067/attach/3/Business%20Case%20and%20Planning%20Summary.pdf> (Accessed 3 December 2019)



6. Further analysis on Option 1 was undertaken with the calculation of development scenarios for the overall BLE project on residential, retail, and office floorspaces. Three scenarios were examined, as follows:
- Base – currently planned development, without BLE
  - High growth – Optimistic view of planned development, without BLE
  - Aspirational growth – Accounting for the percentage uplift of growth brought by the BLE proposal
7. The outcomes of these development scenarios regarding the LB of Lewisham is demonstrated in Figure 2 below.

	Southwark	Lewisham	Bromley	Total
<b>Residential Units</b>				
Base	45,564	33,121	13,138	91,822
High Growth	51,506	37,303	38,422	127,232
Aspirational	54,516	38,568	38,549	131,633
<b>Retail (sqm)</b>				
Base	144,251	114,673	207,041	465,964
High Growth	178,480	126,386	228,750	533,617
Aspirational	183,500	129,117	229,439	542,056
<b>Office (sqm)</b>				
Base	743,621	177,163	147,738	1,068,522
High Growth	844,096	177,593	346,609	1,368,298
Aspirational	852,973	179,121	347,217	1,379,310

Figure 2 Development scenarios by borough (TfL Business Case Report 2014)

#### Site selection – New Cross Gate station location

8. Following the analysis undertaken regarding route alignment, further work was undertaken to determine station locations. In TfL's 2017 *Background to Consultation Report*, a list of locations was considered, such as Fordham Park, New Cross Gate Cutting Nature Reserve, New Cross Bus Garage, Council owned housing on Achilles Street and the current New Cross Gate station. Of these options, the existing New Cross Gate station area was evaluated to be most appropriate due to the proximity to the existing transport interchange.
9. Figure 3 below includes an image extracted from the 2017 *Background to Consultation Report* produced by TfL. This graphic demonstrates the

geographic location of each of the potential BLE station sites at New Cross Gate.

Figure 22 - Site options considered for proposed New Cross Gate station

Option	Description
1	An Underground station with a station box (cut and cover construction) at vacant site to east of railway
2	An Underground station (excavated construction) at a southerly diagonal alignment across Sainsbury's site, the rail station and a vacant site on the east side
3	An Underground station (excavated construction) at Sainsbury's Site, the rail station and New Cross Road and an area on St James' Road (Goldsmiths)
4	An Underground station with a station box (cut and cover construction) at Sainsbury's site

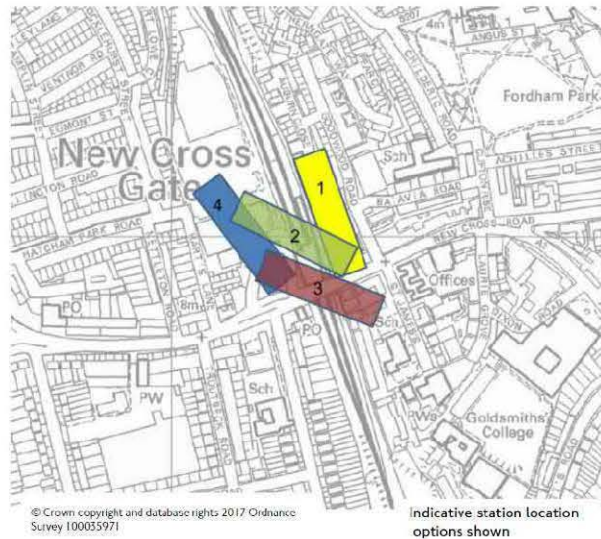


Figure 3 Station alignment options at New Cross Gate

10. As demonstrated in Figure 3, not all options occupied the Sainsbury's site as evidenced by the siting of Option 1. Despite this, the assessment undertaken by TfL determined that Option 4 was preferential as it:
  - Would only require the Sainsbury's site (albeit taking a large part of it);
  - Enables works to be contained to a single site with direct access from the main road, reducing impact on local highways from construction traffic;
  - Allows for an adjacent ticket hall or consolidated building, reinforcing established connections to the station and overcoming existing passenger space constraints;
  - Provides easy access to bus services; and
  - Allows for further development proposals on-site which can take place once station construction is completed.
  
11. In addition to the assessment undertaken by TfL, the LB Lewisham's *New Cross Area Framework* published in 2019 included a detailed design-led study which concluded that the development of a new station interchange at New Cross Gate would represent a major opportunity to improve the

area. Figure 4 includes an extract from the *New Cross Area Framework*, demonstrating the layout of the potential options.

**Options for Station Box Locations indicated on diagram**

1. 2017 TfL Hatcham Works/Sainsbury's Option (also known as TfL Option1).

2.a 2017 Sainsbury's + Mount Anvil Consultation Response Option. An option for the station box on the Goodwood Rd site put forward as part of Mount Anvil and Sainsbury's response to the 2017 TfL consultation.

2.b 2018 Sainsbury's + Mount Anvil Amended Consultation Response Option. An amended option for the station box on the Goodwood Rd site put forward as part of Mount Anvil and Sainsbury's response to the 2017 TfL consultation.

3. 2018 TfL Hatcham Works Option. A realigned station box on the Hatcham Works Site that achieves an optimum track alignment.

4. 2018 TfL Goodwood Road Option. An option for the station box to be located primarily on the Goodwood Rd site and under the national rail lines to achieve an optimum track alignment.



**Figure 4 Station alignment options at New Cross Gate, Lewisham New Cross Area Framework (2019, p. 111)**

12. The *New Cross Framework* carried out a detailed analysis of Options 3 and 4 but did not come to any conclusion on a preferred option. The options were assessed on four criteria as follows:

1. creating a high-quality transport interchange;
2. improving wider connections;
3. impact on existing uses; and
4. contribution to the town centre according to objectives set out in the *New Cross Area Framework*.

13. Analysis of effects on existing uses is extracted below.

- Option 3: retains some businesses on Goodwood Road, LB Lewisham homes, and possibility of Sainsbury's store remaining open (subject to construction site requirements). However, other retail units would likely need to close and there will be disruptions to the trading of Sainsbury's.

- Option 4: less impact on the existing Sainsbury's and more flexibility on the design of the replacement store. However, impacts would be greater to the businesses and residential areas on Goodwood Road and surrounding areas (19 units). There would still be disruptions to the Sainsbury's store during construction. Worksite space could be insufficient for construction works.
14. Following the work undertaken by TfL and the subsequent reviews included as part of the *New Cross Area Framework*, a third round of consultation by TfL in began in October 2019.
  15. The station location used for consultation by TfL appears to have selected Option 3 as presented in the *New Cross Area Framework*, albeit with an adjustment to be in a more horizontal orientation, as demonstrated in Figure 5. The rationale for this re-alignment is outlined in paragraph 5.4.4. of the *Background to Consultation Summary Report* (October 2019) which outlines the following:
    - The design has been developed alongside the tunnel route alignment for the extension, to optimise its interface with the station; and
    - The station lies closer to an east-west alignment across the site, reducing its proximity to identified utilities whilst still being well-positioned for construction and use.
  16. Further justification is given in paragraph 5.4.2 which states: *"the site has been selected for the New Cross Gate station because of its size, location and access from the A2. These factors would enable a station to be constructed at least impact, risk, complexity and cost."*



Figure 5 Station alignment presented in 2019 TfL consultation document

17. Having determined a single station alignment to carry forward, TfL's focus of consultation in 2019 is on the location of primary tunnelling works. This assessment evaluated alternative options for these works at various sites, including at Hither Green and Catford Hill Retail Park and the Jubilee Grounds. Despite the assessment of alternative locations, the TfL preference for these works remains at the New Cross Gate site.

#### Perceived benefits of the New Cross Gate site

18. In their *Background to Consultation Summary Report* (October 2019), TfL recognised in paragraph 6.4.5 that "Given the proposed activities at the site, we do not envisage that the current supermarket, other retailers and petrol filling station can remain operational during the construction works for the Bakerloo line extension. This would result in the loss of these services for the local community."
19. TfL justify the curtailment of operations of the Sainsbury's and other stores during the construction of the BLE on the following grounds:

- Some of these impacts may be moderated by trade (and employment) diversion to nearby grocery stores;

- Employment-generating capacities of the station and tunnelling works themselves can mitigate some of the employment losses that may be experienced by Sainsbury's and other stores in the immediate area;
- Once works are complete the site could be allocated/redeveloped to include commercial uses such as a supermarket; and
- For consumers, there is a range of alternative retailers in the local area (along Old Kent Road, in the Lewisham town centre area, Deptford and Surrey Quays) that can provide comparable retail services.

### **Review of TfL position**

20. Through subsequent assessments undertaken by WSP | Indigo it is evident that the justifications provided by TfL are unsound due to the:
- Reliance on the assumption that the employment generated through the construction phase of the BLE project could be directly exchanged for the retail labour force currently employed by stores operating on the Sainsbury's site;
  - Unavailability of construction employment estimates by TfL and lack of recognition of additional construction jobs that could also be supported by the proposed Sainsbury's redevelopment at the New Cross Gate site;
  - Detailed analysis in the WSP | Indigo Retail Impact Assessment noting that comparable retailers providing a similar offering to the Sainsbury's store are all located outside the Borough. Consequently, these are beyond the 0-5-minute drivetime band impacting accessibility and therefore not representing a like-for-like substitution;
  - Failure of the Equalities Impact Assessment (EqIA) undertaken by AECOM on behalf of TfL in October 2019 to quantify the impacts identified due to the loss of the New Cross Gate store. Furthermore, these impacts to equalities relative to different site options are not evaluated and therefore do not deliver a robust assessment; and
  - Lack of an impact assessment being undertaken to understand the effects of a delay in the provision of housing (including affordable units) which would be prolonged until the completion of the BLE project.
21. While some benefits identified by TfL throughout their assessments are undoubtedly positive, these are not unique to the New Cross Gate site and could arguably be achieved at other locations in the New Cross area.

## **Conclusion**

22. Whilst considerable work has been undertaken by TfL to demonstrate the costs and benefits of the BLE project including the location of the New Cross Gate station and tunnelling worksites, the research and subsequent analysis does not account for the wider value and contribution to the local community of the existing Sainsbury's store.
23. Furthermore, the analysis fails to capture the potential benefits of the Sainsbury's redevelopment proposals which seek to drive additional value to the local community. Supplementary briefing notes have been provided to evaluate the worth of the Sainsbury's store, along with the opportunity costs that would be lost if the Sainsbury's redevelopment proposals were to be curtailed by the BLE.

# Briefing Note



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## The Value of the Sainsbury's Store to the Local Area

### Introduction

1. This briefing note outlines the value generated through the activities of the existing Sainsbury's store at New Cross Gate. This is evaluated through the calculation of Gross Value Added (GVA) to the local economy and the wider Social Value (SV) created by the store, along with an analysis of the deprivation experienced in the local area.
2. The analysis highlights the measurable influence of the Sainsbury's store on the local community and demonstrates a significant contribution that would be lost if the store were to close.

### Deprivation in New Cross Gate

3. The English Indices of Deprivation 2019 (EID 2019) measure the relative deprivation of neighbourhoods across England through the analysis of socio-economic conditions within lower-layer super output areas (LSOAs).
4. The location of the Sainsbury's store at New Cross Gate falls within the Lewisham 003C LSOA and in 2019 was ranked 10,338 out of 32,844 LSOAs in England, with 1 being the most deprived LSOA<sup>8</sup>. This places the LSOA within the most deprived 31.5% of neighbourhoods in the country.
5. It should be noted that there are 6 other LSOAs immediately surrounding the Lewisham 003C LSOA. Of these surrounding LSOAs, one half are in the 20% of the most deprived and the other half are within the 30% most deprived neighbourhoods in the country. This briefing note outlines the value generated through the activities of the existing Sainsbury's store at New Cross Gate. This is evaluated through the calculation of Gross Value Added (GVA) to the local economy and the wider Social Value (SV) created by the store, along with an analysis of the deprivation experienced in the local area.
6. The analysis highlights the measurable influence of the Sainsbury's store on the local community and demonstrates a significant contribution that would be lost if the store were to close.

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<sup>8</sup> Office of National Statistics (2019) English indices of deprivation 2019 [Online]. Available from: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> (Accessed 26 November 2019).



7. The English Indices of Deprivation 2019 (EID 2019) measure the relative deprivation of neighbourhoods across England through the analysis of socio-economic conditions within lower-layer super output areas (LSOAs).
8. The location of the Sainsbury's store at New Cross Gate falls within the Lewisham 003C LSOA and in 2019 was ranked 10,338 out of 32,844 LSOAs in England, with 1 being the most deprived LSOA<sup>9</sup>. This places the LSOA within the most deprived 31.5% of neighbourhoods in the country.
9. It should be noted that there are 6 other LSOAs immediately surrounding the Lewisham 003C LSOA. Of these surrounding LSOAs, one half are in the 20% of the most deprived and the other half
10. Within a 1km radius of the Sainsbury's store there are LSOAs which have been assessed as being within the 10% most deprived areas in England. These figures demonstrate that the local area is home to local communities facing significant deprivation and disadvantage.
11. The EID 2019 assessed by the Ministry of Housing, Communities & Local Government are formed based on seven different domains including:
  - Income Deprivation
  - Employment Deprivation
  - Education, Skills and Training Deprivation
  - Health Deprivation and Disability
  - Crime
  - Barriers to Housing and Services
  - Living Environment Deprivation
12. A summary on how the current Sainsbury's store positively contributes to each of these domains is detailed in Table 1 below.

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<sup>9</sup> Office of National Statistics (2019) English indices of deprivation 2019 [Online]. Available from: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> (Accessed 26 November 2019).

Table 1 Overview of EID and relevance to current Sainsbury's store

EID Domain	Current Sainsbury's contribution
<b>Income Deprivation</b>	<p>The New Cross Gate store currently employs 140 FTE staff members<sup>10</sup> with 87% of these living in the local Lewisham area<sup>11</sup>. Research undertaken by WSP   Indigo in January and February 2019 found that 52% of the people surveyed stated that they intended to combine their visits to the New Cross Gate store with trips to other nearby retailers. Consequently, the Sainsbury's store plays a vital role as an anchoring retail business which therefore indirectly contributes to the employment of other nearby stores. This means that access to employment opportunities for income generation through both the Sainsbury's and other shops nearby would be lost if the store were to close.</p>
<b>Employment Deprivation</b>	<p>The New Cross Gate store employs 230 staff members with 181 working part-time<sup>12</sup>. The availability of part-time employment offers opportunities to a wider range of workers including parents and students who may be unable to engage in full-time work. Additionally, the diverse range of roles offered by Sainsbury's allow for entry-level opportunities to people either beginning or re-entering the workforce. This is beneficial given 28% of residents in the New Cross area were assessed as having low or no skills<sup>13</sup>.</p> <p>The availability of a diverse range of employment prospects is critical as 8% of the working age population in New Cross are unemployed, 3% of these classified as being 'long term unemployed'<sup>14</sup>. Furthermore, the Lewisham 003C LSOA was ranked among the 2.3% most deprived neighbourhoods in the country for this EID domain.</p>

<sup>10</sup> Based on staff records provided by Sainsbury's Human Resources provided on 25 April 2018

<sup>11</sup> Figures taken from Sainsbury's Consultation Report (p.11) dated 7 December 2018

<sup>12</sup> Based on staff records provided by Sainsbury's Human Resources provided on 25 April 2018

<sup>13</sup> NOMIS (2011) *Qualifications and Students* [Online] Available from: [https://www.nomisweb.co.uk/reports/localarea?compare=E05000449#section\\_8\\_0](https://www.nomisweb.co.uk/reports/localarea?compare=E05000449#section_8_0) (Accessed 10 December 2019)

<sup>14</sup> NOMIS (2011) *Economic Activity* [Online] Available from: [https://www.nomisweb.co.uk/reports/localarea?compare=E05000449#section\\_8\\_0](https://www.nomisweb.co.uk/reports/localarea?compare=E05000449#section_8_0) (Accessed 10 December 2019)

<b>Education Skills and Training Deprivation</b>	<p>The Sainsbury's store currently promotes opportunities for trainees and apprentices. This assists in the generation of flow as this enables young people a pathway to formal qualifications. In addition to this, training programmes offered to staff members within the store encourage upskilling initiatives and consequently improve the stock of qualified people within the local area.</p> <p>In addition to the operation of the grocery store, the Explore Learning Centre located on the Sainsbury's premises offers tuition courses for children in both primary and secondary school. During the school term, this equates to approximately 38 hours per week and during the school holiday period is approximately 54 hours per week<sup>15</sup>. This contribution to the education of young people in the local area would be lost in its current format if the store was to close.</p>
<b>Health Deprivation and Disability</b>	<p>Given the size of the New Cross Gate store, the ability to stock a wide variety of fresh food options is pertinent to encouraging the local community to make positive health choices. Other initiatives such as bike parking to encourage active transport and the availability of space for social interactions through the existing café facility also lead to improvements in health outcomes.</p> <p>The loss of the existing Sainsbury's store will increase the community reliance on small to medium sized grocery stores in the area. This will impact both the variety and price of fresh food as smaller grocery stores generally have a reduced range at a higher price point.</p> <p>Furthermore, the benefits of the café and other facilities that are co-located on the premises would also be lost. These impacts have the potential to negatively influence the health outcomes of residents in the immediate area.</p>

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<sup>15</sup> Figures estimated through review of opening hours as published on Explore Learning Centre website, available from: <https://www.explorelearning.co.uk/tuition-centre/london-new-cross-gate/>

<p><b>Crime</b></p>	<p>The presence of the New Cross Gate store provides activation of public space. The store is open until 10pm all nights except for Sunday, ensuring that activity remains in the area after dark. This is coupled with security and CCTV to provide additional crime prevention measures, increasing the safety perception of the area. This is important as the area immediately surrounding the New Cross Gate store had 180 crimes per 1,000 residents in 2018, compared to the overall London rate of 175 per 1,000 residents<sup>16</sup>. The activation of space provided by the store and the positive impacts this has on the deterrence of crime would be lost if the store were to close.</p>
<p><b>Barriers to Housing and Services</b></p>	<p>In urban environments, grocery stores are undoubtedly vital social infrastructure as they are essential for maintaining a good quality of life. In addition to the grocery store, the New Cross Gate site includes other facilities required by the community such as a pharmacy and petrol station which remain open most nights until 9pm and 10pm respectively. This access is important, particularly regarding the pharmacy as it is one of only two pharmacies in the area that remain open after 7pm.</p> <p>As identified in the WSP   Indigo Retail Impact Assessment, approximately 60% of sales at the New Cross Gate store is generated by customers who reside within a 5-minute drive time of the store. Given this high reliance on the store by local people and the convenience offered by the co-location of other vital services, this presence is important to continue accessibility for the community.</p>
<p><b>Living Environment Deprivation</b></p>	<p>The New Cross Gate store currently provides online shopping services to the wider local area. The use of these services is positive as they reduce the use of private vehicles. This not only creates a better environment through loss of traffic impacts and associated effects such as poor air quality, but also decreases the risk of road traffic accidents.</p> <p>The removal of this store and the online shopping it provides for will impact the availability of these services in the local area and will place additional stress on other stores to fill this void.</p>

13. Given the level of deprivation experienced within the New Cross Gate area, it is apparent through the analysis undertaken in Table 1 that the removal of the Sainsbury's store and the important role it currently plays as the 'anchor' of the New Cross/New Cross Gate District Centre will detrimentally impact the community and potentially worsen its relative

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<sup>16</sup> Metropolitan Police (2018) Crime Data Dashboard [Online]. Available from: <https://www.met.police.uk/sd/stats-and-data/met/crime-data-dashboard/> (Accessed 5 December 2019).

deprivation.

### **Gross Value Added to the local economy**

14. The Sainsbury's New Cross Gate store currently employs 230 people made up of 49 full-time employees and 181 part-time employees<sup>17</sup>. It has been assumed that two part-time jobs are equivalent to one full-time job, reflecting the fact that part-time staff at Sainsbury's typically work around 20 hours per week.
15. Based on these assumptions, the Sainsbury's store currently employs 140 full-time equivalent (FTE) staff. The employment at the store has wider economic effects by generating Gross Value Added (GVA) to the Lewisham economy. The Office for National Statistics defines GVA as "the contribution of each individual producer, industry or sector to the economy."
16. Detailed information on GVA per job filled is provided by the Regional Economic Analysis Sub-Regional Productivity tables published in January 2019 by the Office for National Statistics. Table B3 reveals that GVA per filled job for the Inner London East region was £75,372 in 2017, the most recent year for which data is currently available.
17. Data on GVA per filled job is also available at a more granular level for Lewisham and Southwark. Table B3 reveals that GVA per filled job for Lewisham and Southwark was £62,118 in 2017, the most recent year for which data is currently available.
18. Based on this evidence, WSP | Indigo estimates that the 140 FTE jobs the Sainsbury's store in New Cross Gate create GVA to the local economy of approximately **£8.7 million per annum**.
19. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This significant figure demonstrates the major contribution of the Sainsbury's store to the Lewisham economy.

### **Generation of Social Value**

20. Estimating GVA is useful to understand the flow on economic impacts of the jobs provided by the Sainsbury's store. What this figure does not calculate, however, is the additional value that is generated beyond labour

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<sup>17</sup> Based on staff records provided by Sainsbury's Human Resources provided on 25 April 2018

productivity.

21. The process known as Social Value (SV) promotes the holistic evaluation of social, environmental and economic effects, aiming to go beyond the 'business as usual' approach of assessing impacts primarily on financial terms. It is important to understand that SV is not simply a way of measuring the impact of a business activity upon people; but rather a method for assessing works or services and the worth they generate to society overall.
22. The SV of the Sainsbury's store at New Cross Gate has been assessed using a modified version of the National Themes Outcomes Measures (TOMs) Framework<sup>18</sup>. This Framework is a publicly available tool originally released in 2017 by the Social Value Portal designed around 5 themes, 18 outcomes and 35 measures.
23. For the purposes of this high-level assessment, 4 measures have been assessed. **Error! Reference source not found.** Table 2 below lists these measures as described within the National TOMs Framework along with the corresponding themes and outcomes these are attributed to.

Table 2 Themes, Outcomes and Measures selected for modified SV assessment

Theme	Outcome	Measure ID	Measure
<b>Jobs: Promote Local Skills and Employment</b>	More local people in employment	NT1	Number. of local people (FTE) employed on contract for one year
<b>Growth: Supporting Growth of Responsible Regional Business</b>	Improve staff wellbeing	NT20	Demonstrate commitment to work practices that improve staff wellbeing, recognise mental health as an issue and reduce absenteeism due to ill health. Identify time dedicated for wellbeing courses
<b>Social: Healthier, Safer and more Resilient</b>	More working with the Community	NT28	Donations or in-kind contributions to local community projects (£ & materials)

<sup>18</sup> Social Value Portal Ltd (2019) *National TOMs 2019 (Basic Calculator)* [Online]. Available from: [socialvalueportal.com](http://socialvalueportal.com) (Accessed 26 November 2019).

<b>Communities</b>		NT29	Number of hours volunteering time provided to support local community projects
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24. To calculate SV, financial proxies are applied to generate estimated monetised values. The proxies within the National TOMs Framework have been developed by the Social Value Portal through significant research and have been evaluated in line with cost benefit analysis and appraisal techniques as outlined in the Treasury Green Book and other relevant public-sector guidelines.
25. Importantly, these proxies have been updated to reflect local conditions where possible. A key example of this is the use of the average annual income specific to the Lewisham area, rather than the adoption of the national average figures. This ensures specificity to the local area and enables a more robust estimation of the value generated within the local context.
26. The modified version of the TOMs assessment has been included below in Table 3.

Table 3 Modified TOMs Assessment for Sainsbury's New Cross Gate store

<b>Measure</b>	<b>How this is measured</b>	<b>Financial proxy</b>	<b>Sainsbury's contribution</b>	<b>Social Value generated per year</b>	<b>Assumptions</b>
<b>No. of local people (FTE) employed on contract for one year</b>	No. people FTE	£33,830	140 FTE	£4,736,200.00	There are currently 140 FTE staff members at the New Cross Gate store. A localised proxy has been used to accurately reflect the conditions in the Lewisham area. This has been informed by the Annual Survey of Hours and Earnings (ASHE) from figures gathered in 2016, which is the latest data available.

<p><b>Demonstrate commitment to work practices that improve staff wellbeing, recognise mental health as an issue and reduce absenteeism due to ill health. Identify time dedicated for wellbeing courses</b></p>	<p>No. hrs*no. attendees</p>	<p>£97.75</p>	<p>115 hours <i>(0.5 hours * 230 staff members)</i></p>	<p>£11,240.96</p>	<p>230 staff members undertake a minimum of 30 minutes of mental health initiatives per year. This includes activities during Mental Health Awareness Month (held in May each year) which includes a specific focus on mental health during staff briefings (also known as 'Huddles'), posters and information on the staff intranet and in the monthly staff journal. Mental health awareness is also included in the mandatory staff induction programme.</p>
<p><b>Donations or in-kind contributions to local community projects (£ &amp; materials)</b></p>	<p>£ value</p>	<p>£1.00</p>	<p>£10,400 <i>(£200 of donations per week for 52 weeks of the year)</i></p>	<p>£10,400.00</p>	<p>The New Cross Gate store donates food it has not sold to local charities including the Lewisham Food Bank and Deptford Reach. This is done on an ad hoc basis subject to food availability at the end of each day. Sainsbury's estimate this value to be approximately £50 each day with food collections occurring roughly 4 times per week. This equates to approximately £200 per week.</p>



<b>No. hours volunteering time provided to support local community projects</b>	No. staff volunteering hours	£14.80	230 hours <i>(1 hour of allocated volunteer time per staff member)</i>	£3,404.38	Sainsbury's actively encourage their employees to partake in volunteer initiatives. The format of this changes each year depending on the focus of the company and the individual stores. At the New Cross Gate store for the 2019 financial year, this has been in the form of allowing staff members to complete 1 hour of volunteer time either through specific sessions organised by the store, or with other local organisations of their choice. It is known that many staff members volunteer more than 1 hour per year, therefore this is a conservative estimate.
<b>TOTAL SOCIAL VALUE</b>				<b>£4,761,245.33</b>	

27. Through the modified assessment undertaken, the **SV generated by the Sainsbury's store is estimated to be £4.8 million per annum**. This is a conservative figure given only a modified assessment was undertaken and analysis of other measures would undoubtedly generate further SV.

### Conclusion

28. The existing Sainsbury's store at New Cross Gate provides significant social and economic value generating:
- £8.7 million per annum in GVA; and
  - £4.8 million per annum in SV.
29. These figures are noteworthy given the evident deprivation in the immediate New Cross Gate area, demonstrating the positive contribution of the store to the local community. As this Briefing Note outlines, the services provided by the store and the flow-on impacts of its presence are substantial. The removal of the Sainsbury's store at New Cross Gate will be detrimental and undoubtedly lead to negative socio-economic impacts within the local community.



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## **Bakerloo Line Extension – Development Opportunity Cost**

### **Introduction**

1. This briefing note outlines the opportunity cost of the Bakerloo Line Extension (BLE) going forward at New Cross Gate, which would forego a comprehensive redevelopment proposal currently being promoted by Sainsbury's Supermarkets Ltd (SSL) in conjunction with Mount Anvil, A2Dominion and partners.
2. In Transport for London (TfL)'s latest consultation document published in October 2019, the proposed station at New Cross Gate as part of the BLE would lie north-west to south-east across the southern portion of the existing Sainsbury's site. Consequently, this would mean that the redevelopment proposal would not be realised, resulting in the loss of the following:
  - An increase in gross floorspace of 1,915sqm;
  - An increase in net sales floorspace for the Sainsbury's store by 432sqm along with the addition of floorspace for complementary retail uses;
  - An enhanced goods online (GOL) services;
  - Approximately 30 additional jobs created at Sainsbury's along with 68 full-time equivalent (FTE) jobs generated by other businesses; and
  - The construction of 1,161 residential units with a proportion of these being affordable housing units.
3. This briefing note demonstrates the opportunity cost of the proposed development not proceeding.

### **Gross Value Added**

4. The Retail Impact Assessment undertaken by WSP | Indigo in October 2019 stated that the new development would provide 30 more jobs at the Sainsbury's store. In the current store, 230 people are employed, equivalent to 140 full-time equivalent (FTE) demonstrating that approximately 20% of staff work full-time and 80% on part-time contracts. Applying this ratio to the 30 additional jobs estimated by Sainsbury's, it has been assumed that this equates to 6 full-time and 24 part-time staff. Assuming a part-time staff member is equivalent to a 0.5 FTE employee, the overall increase to FTE colleagues at the New Cross Gate store would be 18 FTE. This is in addition to the current 140 FTE, leading to a total figure of 158 FTE at the new store.

5. While additional jobs are estimated through the Sainsbury's expansion, the closure of retail warehouses and other stores operating on the site as part of the redevelopment proposals will result in some employment losses, estimated to be approximately 50 FTE<sup>19</sup>.
6. While these jobs would be lost, additional employment opportunities are supported by complementary retail spaces within the proposed redevelopment. The net internal sales area of these stores is estimated to be 1,189sqm<sup>20</sup>. Using the Homes and Communities Agency Employment Density Guide of 15-20 jobs per sqm for this class use, 17.5 jobs per sqm has been used as a mid-range point<sup>21</sup>. Consequently, the retail area is proposed to support approximately 68 FTE jobs.
7. The development is therefore proposed to generate a positive net increase of 18 FTE. Combining this with the 158 FTE proposed for the new Sainsbury's store, 176 FTE are estimated for the redevelopment.
8. Detailed information on GVA per job filled is provided by the Regional Economic Analysis Sub-Regional Productivity tables published in January 2019 by the Office for National Statistics. Table B3 reveals that GVA per filled job for Lewisham and Southwark was £62,118 in 2017, the most recent year for which data is currently available.
9. Based on this evidence, it is estimated that the 176 FTE jobs projected at the New Cross Gate redevelopment would create GVA to the local economy of approximately **£10.9 million per annum**. This is a £2.2 million increase per year from the current store operations.
10. This is a permanent economic benefit which would be enjoyed in perpetuity if the redevelopment were to occur. This significant figure demonstrates the major contribution of the Sainsbury's store to the Lewisham economy. Consequently, the cessation of the redevelopment plans and removal of the current store operations would see a loss of almost £11 million each year in perpetuity in gross value added to the local economy.
11. As the Sainsbury's store acts as the key anchor for the New Cross/New Cross Gate District Centre (District Centre), the GVA calculated represents a conservative figure. This is because it fails to account for other jobs that would be lost from other businesses operating in the immediate area who rely on the Sainsbury's as a driving force for generation of activity in the

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<sup>19</sup> Figure used from Environmental Statement Main Report completed by Trium (Chapter 5, table 5.25)

<sup>20</sup> Figure used from Environmental Statement Main Report completed by Trium (Chapter 5, paragraph 5.146)

<sup>21</sup> Homes and Communities Agency (2015) *Employment Density Guide: 3<sup>rd</sup> Edition* [Online]. Available from: [https://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/national-evidence/NE48\\_employment\\_density\\_guide\\_3rd\\_edition.pdf](https://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/national-evidence/NE48_employment_density_guide_3rd_edition.pdf) (Accessed 5 December 2019).

region. It is therefore evident that closure of the store will have both significant and far-reaching impacts on the District Centre.

### **Residential provision**

12. The proposed development provides a high-density residential complex ranging between 6 and 30 storeys, positioned directly above the expanded Sainsbury's store<sup>22</sup>. This estimates up to 1,161 residential units could be constructed through the redevelopment with a proportion of these allocated as affordable housing units.
13. This increase in housing supply is important for the New Cross Gate site within the Lower Super Output Area (LSOA) Lewisham 003C as it is ranked in the 10% most deprived neighbourhoods in England regarding barriers to housing services<sup>23</sup>.
14. Additionally, the increase in stock of housing also implies an increase in residents in the immediate area with estimates of up to 1,974 persons for the development. The WSP | Indigo Retail Impact Assessment indicates that this population increase would amount to additional spending in the District Centre of up to **£3.6 million for convenience expenditure** and **£6.5 million in comparison expenditure**. This spending and its positive influence on the community would not be realised if the redevelopment were to not go ahead.

### **Retail provision**

15. The existing Sainsbury's store has a total net sales area of 3,235sqm. This will be extended by 432sqm to 3,667sqm by the redevelopment proposal<sup>24</sup>. The Retail Impact Assessment undertaken by WSP | Indigo estimated that through this expansion and subsequent impacts to surrounding retailers, the turnover of the District Centre would be £86.94 million, an increase of £11.24 million on the baseline scenario, resulting in a **positive impact of +14.9% on the District Centre**.
16. The positive impact on the District Centre is particularly important at a time when it is widely-reported that high streets are suffering from the closure of an unprecedented numbers of shops; reduced store openings; job losses; increasing vacancy rates and the commercial instability of some of the highest profile and longest-serving retailers on the high street<sup>25</sup>. Consequently, the redevelopment plans demonstrate a significant

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<sup>22</sup> Draft drawing produced by Rolfe Judd, referenced K(90)D01 1F

<sup>23</sup> Office of National Statistics (2019) English indices of deprivation 2019 [Online]. Available from: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> (Accessed 26 November 2019).

<sup>24</sup> Figure 1, WSP | Indigo Retail Impact Assessment (October 2019)

<sup>25</sup> Paragraph 8.11., WSP | Indigo Retail Impact Assessment (October 2019)

investment to safeguard the long-term vitality of the wider District Centre.

17. In addition to the increases in store size, the redevelopment plans allow for an increase offering in goods online (GOL) services. In its current format, the Sainsbury's store can accommodate 3 GOL vans while the redevelopment plans propose capacity for 14 GOL vans.
18. This increase by 9 vans will enable an uplift of online sales which has been estimated to provide an increase in sales by approximately **£11 million** for the New Cross Gate store. This shift to GOL services is important for the local community as it enhances the accessibility to fresh food sources. Furthermore, there are considerable sustainability benefits associated with GOL, including the reduction in car use and the flow on impacts of this on traffic, road incidents and air quality in the local area.
19. The positive impacts on the community through retail expansion and investment in the District Centre will be lost if the current plans for redevelopment are not realised. The extended closure of the New Cross Gate site for the proposed BLE construction period will have a significant impact on the District Centre, likely resulting in its de-designation. Consequently, seeking to replicate the redevelopment plans once the potential BLE station is built cannot be assumed to generate the same level of benefits to the local area.

### **Additional impacts**

20. By foregoing the plans for the redevelopment of the Sainsbury's site, further benefits would not be realised:
  - Improvement in the shopping environment allowing for positive impacts on the District Centre;
  - Continued promotion of active transport through the convenience offered by an accessible supermarket located within the surrounding neighbourhood; and
  - Maintenance of employment opportunities for the existing retail workforce in addition to offering construction jobs as part of the redevelopment.

### **Conclusion**

21. The redevelopment plans proposed by SSL, Mount Anvil, A2Dominion and partners would provide a significantly positive socio-economic impact for the Lewisham area, most pertinently the District Centre which the Sainsbury's store acts would continue to act as a vital anchor.
22. The benefits associated with the plans for the New Cross Gate store are

extensive and would directly benefit the local economy, increase the housing stock and enhance community accessibility to vital services and infrastructure.

Ref.            bfn.002.PH.20870036  
Date:         10 December 2019  
Subject:      Bakerloo Line Extension – Socio-economic review





# Sainsbury's New Cross Gate

Retail Statement

**Sainsbury's New Cross Gate,  
New Cross, Lewisham  
Retail Statement**

September 2019

**WSP | Indigo**

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# **Sainsbury's New Cross Gate, New Cross, Lewisham Retail Statement**

## **Appendices**

### **Appendix 1**

Images of Selly Oak Store

### **Appendix 2**

Study Area Plan

### **Appendix 3**

Quantitative Retail Assessment

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# 1. Introduction

- 1.1. This Retail Statement has been prepared by WSP | Indigo on behalf of Sainsbury's Supermarkets Ltd (SSL) in support of an application on behalf of New Cross Gate (Phase 1) LLP' formed of Mount Anvil and A2 Dominion in partnership with Sainsbury's Supermarkets Ltd ('the Joint Applicants'), for the redevelopment of the existing Sainsbury's store, and petrol filling station and the adjacent New Cross Gate Retail Park at New Cross Gate. The Statement examines the role of the existing Sainsbury's store and addresses the implications for New Cross/New Cross Gate District Centre should the current Sainsbury's store be replaced by a Sainsbury's Local store or lost to the centre entirely. We also consider the implications for the District Centre if the proposed mixed-use scheme which is being promoted by the Joint Applicants is delivered. This scheme includes an improved and expanded new Sainsbury's store at the front of the site to facilitate improved connection with New Cross/New Cross Gate District Centre.
- 1.2. As well as a new relocated Sainsbury's store, the proposed mixed-use redevelopment will deliver a high-density residential development of 1,161 units within multiple blocks across the remainder of the site. The redevelopment will deliver a more intense and higher quality development on the currently under-utilised site while enhancing Sainsbury's role as an anchor within the District Centre. Importantly, the redevelopment proposals will ensure the ongoing operation of the existing Sainsbury's store until the new store is delivered. Residents will, therefore, have continuous access to meet their grocery needs until the new store is operating.
- 1.3. The London Borough of Lewisham (The Council) has requested that WSP | Indigo prepare a retail analysis to consider the value and importance of the current Sainsbury's store, and the likely negative impact for the New Cross/New Cross Gate District Centre if the store was to close or downsize as a result of the aspirations to use the site to facilitate the Bakerloo Line Extension (BLE). It would not normally be necessary to undertake a retail assessment for an in-centre retail proposal, but this assessment is provided at the request of the Council.
- 1.4. As a precursor to the analysis, this Statement, which is submitted as part of the Planning Application package, also sets out the background to the application site and proposed development as well as an overview of relevant retail policy matters.
- 1.5. In order to inform our quantitative assessment and to establish existing shopping habits, and the level of links between the Sainsbury's store and rest of the District Centre, we have commissioned the following four surveys (discussed further in Section 6):
  - a new household survey;
  - two exit surveys at the existing Sainsbury's store and the adjacent retail park; and
  - a survey within the District Centre.
- 1.6. These surveys were commissioned at the request of the Council and were undertaken in addition to the Council's own relatively recent survey evidence that was used as part of the retail evidence base for the forthcoming Local Plan.
- 1.7. This Retail Statement has the following structure:
  - Section 2: Site Context and Surroundings;
  - Section 3: The Proposals;
  - Section 4: Policy Matters;
  - Section 5: Retail Context;

- Section 6: Survey Analysis;
- Section 7: Impact Assessment; and
- Section 8: Conclusions.

1.8. This Statement demonstrates that the proposed redevelopment of the Sainsbury's site provides an opportunity to deliver a high quality and well-designed scheme on a town centre site in a highly sustainable and accessible location. The proposed redevelopment will enhance the site and surrounding area, making a positive contribution to the local economy by delivering new investment and a more appropriate high-quality development; as well as securing greater connection between the Sainsbury's store which 'anchors' the New Cross/New Cross Gate District Centre.

## 2. Site Context and Surroundings

### Site Description

- 2.1. The application site occupies approximately 3.9ha in New Cross Gate. It is an irregular shaped site with the railway line and New Cross Gate Station to the east, residential development to the west, and a frontage of 95m on New Cross Road to the south.
- 2.2. The site currently comprises of a Sainsbury's store, together with its surface level car park, and a Sainsbury's petrol filling station fronting New Cross Road. The site also includes New Cross Retail Park which comprises three retail warehouse units currently occupied by Dreams, TK Maxx, and Benson for Beds / Harveys. These are located closer to the main road frontage, between the Sainsbury's store and petrol filling station.
- 2.3. The existing Sainsbury's store is located at the rear of the site, adjoining the site's northern boundary. As such, the store entrance is approximately 300m from the site entrance on New Cross Road, and the rest of the District Centre. The considerable 'setback' to the store is likely to reduce the potential for links between the store and the rest of the District Centre because shoppers have to walk a considerable distance even to leave the site. The existing store, which is more than 20 years old, is oriented to the car-borne shopper, with secondary regard to shoppers travelling by public transport or foot/cycle.
- 2.4. Bringing the store forward to the New Cross Road frontage will significantly improve the opportunity for links and enhance the role of the Sainsbury's store as an 'anchor' as it will sit alongside the rest of the District Centre. It also releases the remainder of the site for residential development.
- 2.5. The existing Sainsbury's store is a popular and well performing store but, as noted, it is dated and no longer meets modern customer expectations or Sainsbury's format requirements in respect of aisle widths, product ranges and internal layout. The store's capacity to continue to meet the needs of its existing and growing customer base relies on its improvement and its enhancement to enable it to respond to changes in consumer demand and shopping patterns, to compete with local grocery competition as well as operational changes and efficiency improvements such as the expansion of goods online services. The replacement store will allow Sainsbury's to provide a refreshed, high specification and greater offer to their customers. The proposed development also presents an opportunity to improve the accessibility of the store for shoppers travelling by more sustainable means of transport by moving it much closer to transport links.

### Accessibility

- 2.6. The site has frontage to, and takes principal vehicular and pedestrian access from, New Cross Road (the A2) with the Sainsbury's store and retail warehouse units accessed via internal circulation routes. The A2 is a major distributor route through the London Borough of Lewisham and neighbouring areas.
- 2.7. The site immediately adjoins New Cross Gate train station to the east. New Cross train station is some 600m away at the eastern end of New Cross/New Cross Gate District Centre. The site also has excellent access to London bus services, with a bus stop located on the site's frontage, on New Cross Road.
- 2.8. The site is, therefore, readily accessible by a range of sustainable public transport modes and has a PTAL rating of 6b, indicating the highest level of accessibility.
- 2.9. The existing Sainsbury's car park currently provides one of the only car parking facilities

within the District Centre. Currently, shoppers can park at Sainsbury's for two hours free of charge.

### **Surrounding Uses**

- 2.10. The site lies at the western end of the New Cross/New Cross Gate District Centre but lies within the District Centre boundaries. Other than the Sainsbury's site which lies to the west of New Cross Gate station, the District Centre predominantly falls between the New Cross Gate and New Cross railway stations, which are some 600m apart. The northern side of New Cross Road between the two stations essentially comprises the Primary Shopping Frontage and includes: various bars, restaurants and cafes; local retail facilities including convenience stores and local specialist food stores; and local service functions such as estate agents, hairdressers and beauticians. An Iceland store and a Sainsbury's Local are also located within the District Centre. Deptford Town Hall, a prominent, restored Grade II Listed Building, is also centrally located within the District Centre.
- 2.11. The Council's Lewisham Retail Capacity Study (LRCS) 2017, and our own assessment of the health of the District Centre, confirms that it is popular and vibrant, functioning appropriately and effectively in its role as a District Centre.
- 2.12. The site is adjoined by existing residential development, largely characterised by terraced housing, to the west. Along the western boundary, Harts Lane separates the site and residential uses at the southern end of the site, while landscaping separates the residential uses and the site at its northern end. The railway line and New Cross Gate station, accommodating Southern train services, defines the eastern boundary of the site, while New Cross Road defines the site's southern boundary.

### **Bakerloo Line Extension**

- 2.13. Transport for London (TfL) are considering extending the Bakerloo line to improve transport connections in southeast London. An extension of the underground line to Lewisham via Old Kent Road and New Cross Gate has been chosen as the best option. The plan includes establishing a new station at New Cross Gate to provide connectivity between underground, National Rail and bus services. The existing Sainsbury's site has been identified as one of the sites being evaluated for the new station which would result in the loss of the existing store and occupation of the site while the new station is being constructed.



### 3. Background to the Proposals

- 3.1. This Section outlines the plans to redevelop the site, including the background to Sainsbury's requirements for the larger, relocated store. Following this, we revisit the basis for the impact assessment, which has been undertaken at the Council's request, and identify the impact scenarios which will be tested in subsequent sections.

#### The Redevelopment Proposals

- 3.2. Together, the Joint Applicants want to comprehensively redevelop the existing Sainsbury's site, including its existing three retail warehouse units and the petrol filling station, to deliver a high quality, mixed use scheme comprising of a new, relocated Sainsbury's store with concessions; and a high-density residential development. Given the size and location of the site and the extent of redevelopment proposed, the proposals represent an opportunity to deliver significant new investment, regeneration and vitality to a highly sustainable 'centre' site in London and transform a currently under-utilised site.
- 3.3. Details of the redevelopment scheme are well understood by the Council. This Statement does not intend to duplicate those details. Only those aspects relevant to the Sainsbury's store and adjoining retail park are covered below.
- 3.4. As explained, it is proposed to relocate the Sainsbury's store from the rear of the site nearer to the New Cross Road frontage where it can function more appropriately as an 'anchor' for the District Centre and support it more efficiently through linked trips. It will improve the accessibility of the store by bringing it closer to established public transport links. This will be facilitated by the creation of a high-quality concourse/square at the front of the store with level pedestrian access from the pavement to the shop floor.
- 3.5. As explained in further detail below, the redevelopment of the Sainsbury's store is motivated by the need to expand the store's capacity to service online orders, and to provide an improved store layout, design and offer including comparison goods offer within the store to meet customer demand and provide competition. As demonstrated in Figure 1 below, the increase to the net sales area of the store is relatively modest, but the redevelopment will improve the comparison goods offer and general shopping environment. The improvements to the goods online (GOL) provision (accommodated within the gross floorspace expansion) will create capacity for up to 14 GOL vans, compared to the existing three van capacity.

**Figure 1: Sainsbury's floorspace breakdown**

Sqm	Existing Store	Proposed Store	Difference
Gross Floorspace	6,045	7,960	+1,915
Net Sales Floorspace	3,235	3,667	+432
Convenience Floorspace	2,750	2,631	-119
Comparison Floorspace (including Argos)	485	1,035	+550

- 3.6. The new store will be provided over three levels, at the base of a new high-density residential development. Car parking will be at ground floor level, with the store accommodated at Level 1.
- 3.7. Principal pedestrian access will be from a pedestrian forecourt linking the store with New Cross Road. Complementary retail and other active uses will be provided at the ground floor of adjoining residential towers to maintain urban activity at ground floor level. Vehicular

access will be taken from New Cross Road.

### **Requirement for a Large Format Store**

- 3.8. The existing Sainsbury's store has a net sales area of 3,235 sqm and currently serves a relatively confined catchment area with circa 60% of its trade coming from within a 5-minute drive time of the store. Sainsbury's need to retain the current store sales area in order to efficiently serve the needs of customers and to compete with local grocery competition. Reducing the sales area would lead to a weaker customer proposition and result in leakage of sales out of the immediate catchment.
- 3.9. A smaller store would mean customers would have to travel further to do a full shop as a convenience store (Sainsbury's Local format) only offers basket shopping. Clearly, the size of the store dictates the range of goods sold. The product range for a circa 40,000 sq. ft (as proposed) store is around 25,000. This will be very important for local residents who want choice and competition, particularly for items within Sainsbury's 'Basics' range.
- 3.10. By replacing the existing New Cross Gate Sainsbury's store and modestly increasing the net sales area, Sainsbury's will be able to provide a refreshed, high specification offer to their customers within a modern format store. In terms of the additional net sales space, this will primarily be used to provide a larger, more compelling range of clothing and non-food items. An Argos concession and Oasis and Habitat concessions are planned within the replacement store, as part of the non-food expansion, which will complement and enhance the current high street offer, and compensate for the loss of the clothing, and other home and soft furnishing ranges currently available in the three units at New Cross Retail Park. To provide an indication of the design, layout, range and tone of the new store at **Appendix 1**, we provide images of a comparable new Sainsbury's store at Selly Oak. These give a useful depiction of the design and quality of provision within Sainsbury's latest format which will be delivered at New Cross Gate with the proposed redevelopment. The replacement store will provide an improved store layout improving the customer experience and journey in line with Sainsbury's latest thinking. One of the reasons that Sainsbury's has been a successful retailer for 150 years is because they continue to reflect the most up to date thinking in their store design and ensure that the customer journey is key to the store's layout. Importantly, the new format store located close to New Cross Road will reinforce Sainsbury's role in anchoring the District Centre.
- 3.11. Importantly, the existing store provides 230 jobs. This would be reduced to approximately 40 staff if a small format Sainsbury's Local store replaced the existing store. Alternatively, the larger, proposed store would employ 260 colleagues. Supporting job creation is a key aspect of strengthening the local economy and is a relevant consideration in weighing the planning balance of the proposals. Of course, if the Sainsbury's store closed, these jobs would be lost to the area.
- 3.12. Finally, the 1,161 new homes proposed as part of this scheme will further add to the demand for grocery shopping needs within the local area. A smaller store in this location will simply not meet the existing and growing demand. There are locations where foodstore retailers are seeking to consolidate their representation through the closure of stores or reducing the size of stores that are too large. However, there remains a clear and important role for large foodstores serving bulk, main shopping needs and Sainsbury's have identified a requirement to invest in their New Cross Gate store in order to better serve the local population. There is also a need to expand its goods online (GOL) services, as explained below.

### **Enhanced GOL Provision**

- 3.13. We are confident that the Council understand the importance, and popularity, of the goods online (GOL) service to both consumers and retailers. In respect of grocery goods online, London has the highest propensity for GOL, and if growth rates reflect those forecasted by some experts, demand is anticipated to increase by +27% between 2018 and 2021. Clearly,

this is very significant growth in demand within a narrow timeframe.

- 3.14. Shopping for grocery items online is not only convenient for many households, but the service also has clear sustainability benefits through the reduction of car use. Main food grocery shopping typically takes place weekly or fortnightly. Sainsbury's have confirmed that each GOL van can carry up to 10 households shopping and typically would make 3 round trips per day. This means that each van would potentially remove 30 trips from the road network per day (420 trips in total with 14 vans). This represents a huge sustainability benefit as well as reducing pressure on the local traffic and transport network.
- 3.15. It is also particularly relevant that, as Sainsbury's GOL orders are picked from in-store stock, the range offered to GOL customers is determined by the range of products which are offered in the store. Therefore, to maintain a credible and competitive online offer, it is important the store is delivered at the size proposed.
- 3.16. The GOL facility at the existing store (3 vans) is constrained by its size and is close to capacity. It simply cannot meet a material increase in demand. However, the anticipated growth in demand for GOL services will mean that, if the expansion is not delivered, Sainsbury's will have to utilise more distant stores to fill orders. Clearly, this undermines the sustainability benefits of the service, and has traffic and transport implications as a consequence of longer delivery routes. It is essential to have the GOL hub in the most logistically efficient location.
- 3.17. Providing the additional capacity at New Cross allows Sainsbury's to:
- continue to deliver to the territory already served from New Cross, without having to expand the territories of other stores which are located further away from the points of demand; and
  - reverse existing inefficiencies in Sainsbury's territories where other stores already serve some postcode sectors right on the doorstep of the New Cross Gate store because of the limited capacity they have at the store.
- 3.18. The current New Cross Gate GOL territory covers a small geographic area which reflects the limited online capacity at the store. In particular, it focusses on demand within New Cross Gate and South Bermondsey. The improved store (and GOL service) would likely cover the same area (allowing Sainsbury's to respond to the strong online growth rates) plus allow for some location expansion to New Cross, Deptford and Surrey Quays, where online demand is currently fulfilled by the Sainsbury's Charlton Riverside store. This would create shorter and more efficient delivery routes, being more sustainable and better for the environment.
- 3.19. In summary, without investing in the replacement scheme, the existing store simply cannot respond to increasing GOL demand locally. Instead, Sainsbury's would have to utilise other more distant stores, which would similarly impact on their capacity and Sainsbury's would need to identify capacity expansion solutions in other stores. As explained above, the replacement store at New Cross Gate is well located to; meet this need; ensure an efficient and sustainable GOL service; and maintain accessibility to essential grocery needs for the local community.

### **Redevelopment Summary**

- 3.20. We trust that the above explanation provides the Council with the background to Sainsbury's requirement for a larger, relocated store. Sainsbury's has operated a store at its New Cross Gate site and played a key role in meeting grocery needs for its local community, for some 20 years. Sainsbury's wish to invest in the store, to refresh it's offer and expand its services, and to ensure it can continue to appropriately meet consumer demands into the future.

- 3.21. In terms of the quantitative impact assessment which follows in subsequent sections, key aspects of the redevelopment proposals are:
- The relocation of the store from the rear of the site (circa 300m to New Cross Road frontage) to its position closer to the New Cross Road frontage and the associated implications for significantly enhancing linked trips with the District Centre;
  - The considerable improvement to the capacity to service online orders;
  - The increase in the sales floorspace, which will be dedicated to improving the comparison goods offer; and
  - The 'bigger picture' delivery of a comprehensive redevelopment scheme involving a significant new residential scheme to provide housing for the local area, high quality retail floorspace and the opportunity for the Sainsbury's store to more actively and efficiently integrate with, and anchor, the District Centre.

### **Impact Scenarios**

- 3.22. The Council have identified three scenarios in terms of the future of Sainsbury's operations at the site which they have requested that we assess as part of our quantitative impact assessment. Further sections will confirm that a quantitative impact assessment would not normally be necessary for retail proposals within an allocated centre but given the scale of the proposals, we have prepared this assessment to satisfy the Council's request.
- 3.23. In order to fully understand the implications for the District Centre of the future use of this substantial site, the following three scenarios are tested:
1. All retailing operations (including Sainsbury's and New Cross Gate Retail Park) are ceased on the site ('complete closure') as a result of the BLE;
  2. The existing Sainsbury's store and New Cross Gate Retail Park are closed; and a small format Sainsbury's Local store is delivered as part of an alternative scheme; or
  3. The proposed scheme is delivered with an expanded and relocated Sainsbury's store in place of the existing store and New Cross Gate Retail Park, with a store opening date of in 2024.
- 3.24. These scenarios are assessed in quantitative terms in Section 7.

## 4. Policy Matters

- 4.1. This Section briefly reviews relevant planning policy context in relation to the retail element of the proposed redevelopment. A full consideration of planning policy issues is provided in the Planning Statement accompanying the application.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan for London Borough of Lewisham comprises:
- London Plan (2016);
  - Lewisham Core Strategy (2011);
  - Site Allocations Local Plan (2013); and
  - Development Management Local Plan (2014).
- 4.3. A new Local Plan for Lewisham is in its early stages of preparation but is not far enough advanced to be taken into consideration for the purposes of this planning application.
- 4.4. Other policy documents that are material to the consideration and determination of the planning application are the National Planning Policy Framework (NPPF, February 2019), and the National Planning Policy Guidance (NPPG, October 2018).
- 4.5. This Section confirms that the policy framework supports the proposed redevelopment.

### **National Planning Policy Framework**

- 4.6. The NPPF (2019) affords strong policy protection for allocated centres which should be the focus of retail development. In this regard, paragraph 85 states that:
- ‘decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.’
- 4.7. It adds at paragraph 85(a) that planning policies should promote town centres’ long-term vitality and viability, and paragraph 85 (f) seeks to ensure that residential development is also recognised in playing an important role in ensuring the vitality of centres.

### **Development Plan**

- 4.8. As noted, the development plan for New Cross comprises of the adopted London Plan (March 2016), and the Lewisham Core Strategy (2011), Site Allocations Plan (June 2013), and Development Management Local Plan (2014).

### **The London Plan (2016)**

- 4.9. The London Plan is the overall strategic plan for London.
- 4.10. Policy 2.15 of the adopted London Plan relates to the protection of town centres. It states that development proposals should:
- a. sustain and enhance the vitality and viability of the centre;
  - b. accommodate economic and/or housing growth through intensification and selective

- expansion in appropriate locations;
- c. support and enhance the competitiveness, quality and diversity of town centre retail, leisure, employment, arts and cultural, other consumer services and public services.
  - d. be in scale with the centre;
  - e. promote access by public transport, walking and cycling;
  - f. promote safety and security and lifetime neighbourhoods;
  - g. contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure; and
  - h. reduce delivery, servicing and road user conflict.
- 4.11. Paragraph 2.72 identifies that with sensitive, integrated planning, addressing the pressing need for additional housing can also help to tackle retail related issues facing town centre through high density, housing led, mixed use redevelopment in medium sized centres to provide modern premises for those retail and leisure activities which remain viable, or for essential civic and community services, again improving the attractiveness of these centres.
- 4.12. Table A2.1 identifies New Cross/New Cross Gate as a District Centre for a medium level of future growth and regeneration. District Centres are defined by the London Plan as:
- ‘distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically, they contain 10,000–50,000 sqm of retail, leisure and service floorspace. *Some District centres have developed specialist shopping functions*’.

### **The Lewisham Core Strategy (2011)**

- 4.13. The Lewisham Core Strategy sets out a long-term vision, spatial strategy and core policies for shaping the Borough.
- 4.14. The Strategic objectives of the Core Strategy have been grouped into five main themes:
- Regeneration and growth areas;
  - Providing new homes;
  - Growing the local economy;
  - Environmental management; and
  - Building a sustainable community.
- 4.15. Core Strategy Objective 1 seeks to secure regeneration and redevelopment opportunities in Lewisham, Catford, Deptford and New Cross, through the delivery of new homes and jobs, to secure substantial physical and environmental improvements and socio-economic benefits throughout the area to improve deprivation.
- 4.16. Core Strategy Objective 4 encourages investment in new and existing businesses and retail development to improve the physical environment and result in a year on year sustainable increase in the size of the Borough’s economy, including protecting and enhancing the district shopping centres, local shopping centres, parades and the range of farmers’ and street markets, as providers of sustainable local shopping facilities and services to continue to support basic community needs.
- 4.17. New Cross/New Cross Gate is identified within the Core Strategy as a Regeneration and Growth Area. These areas are intended to accommodate the majority of the Borough’s new

housing, retail and employment uses. Paragraph 6.17 identifies that Deptford and New Cross/New Cross Gate are the most deprived locations in the Borough and that their district centres provide an important focus for local communities.

- 4.18. To this end, Spatial Policy 2 states that in the New Cross/Deptford area, the Council will support vibrant district centres as a location for major new retail and leisure development.
- 4.19. In respect of the existing New Cross/New Cross Gate District Centre, the Core Strategy states at paragraph 6/43 that:

The existing New Cross District Centre is combined with the adjoining New Cross Gate to become a larger district centre within the retail hierarchy. Its role within the night economy and relationship to the adjoining Goldsmiths College contribute to *the area's vitality and viability. With the opportunities at the existing New Cross Gate Sainsbury's store and the improvements to New Cross and New Cross Gate rail stations, combining the two centres will help strengthen their role and function to provide goods and services to the local area.*

#### **Site Allocations Local Plan (2013)**

- 4.20. The Sainsbury's site is identified as Site SA6 within the Site Allocations Local Plan. It is identified for mixed use retail, housing, community facilities, a new station access and public space. It is acknowledged that:

The allocation will contribute to improving the vitality and viability of New Cross/New Cross Gate District Centre. There is opportunity for proposals to: provide a strong frontage that addresses New Cross Gate Station as a vibrant, pleasant and attractive area; provide clear access to Sainsbury's and the new development, particularly routes for pedestrians and cyclists across the site and near the station; to improve bus stops/stands at the site; and to provide appropriate scale and massing in relation to the surrounding area. Applicants should involve Transport for London in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements'.

#### **Development Management Local Plan (2014)**

- 4.21. The Lewisham Development Management Local Plan (DMLP) sets out the Council's planning policies for managing development within Lewisham.
- 4.22. Of particular relevance, Policy DM14 relates to district centre shopping frontages, including New Cross/New Cross Gate. It states that district centres will be the focus of main town uses with the supporting paragraph 2.90 recognising that:

the NPPF promotes 'competitive town centre environments' and recognises that town centres are integral to communities and therefore their viability and vitality should be supported. One way of positively contributing to town centres is by encouraging major development within the centres and restricting it in locations outside centres which would divert visitors and trade.'

- 4.23. The DMLP defines a District Centre as:

'A town centre that provides convenience goods and services to local communities and is accessible by public transport, walking and cycling. District centres typically contain 10,000-50,000 square metres of retail floorspace. In the London Borough of Lewisham these are Blackheath,

Deptford, Downham, Forest Hill, Lee Green, Sydenham and New Cross and New Cross Gate.'

## Emerging Policy

### The Draft London Plan (Mayor's Minor Changes)

- 4.24. The Draft London Plan has recently been at Examination and GLA are currently awaiting the Inspectors Report. Once finalised and published, the London Plan 2019 will replace all previous versions of the Plan.
- 4.25. Paragraph 2.1.13 discusses the New Cross Opportunity Area as follows:
- 'There remain significant opportunities for redevelopment especially around stations, which should complement the existing education, leisure, employment and retail offer in New Cross as well as provide additional housing alongside public realm and highways improvements. The proposal for a Bakerloo Line extension station at New Cross Gate will enable delivery of these developments and improvements. The area has an established commercial centre capable of supporting commercial expansion and diversification, building on the existing assets such as Goldsmiths College, University of London areas of artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across and along the traffic-dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities.'
- 4.26. Policy SD6 Town Centres and High Streets requires that the vitality and viability of London's varied town centres should be promoted and enhanced by:
1. encouraging strong, resilient, accessible, and inclusive and viable hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses;
  2. identifying locations for mixed-use or housing-led intensification to optimise residential growth potential, securing a high-quality environment and complementing local character and heritage assets;
  3. delivering sustainable access to a competitive range of services and activities by walking, cycling and public transport;
  4. strengthening the role of town centres as a main focus for Londoners' sense of place and local identity in the capital;
  5. ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy; and
  6. supporting the role of town centres in building sustainable, healthy, and walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.
- 4.27. Policy SD7 Town Centres: Development Principles and Development Plan Documents seeks to ensure that Development Plans and development proposals take a town centres first approach.
- 4.28. Policy SD8 outlines the town centre network. It confirms that:



'District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.'

### **New Cross Area Framework (May 2019)**

- 4.29. The Council have also produced the New Cross Area Framework as part of the evidence base to inform the new Local Plan. The New Cross Area Framework was approved by the Mayor and Cabinet in April 2019. This means that it will form part of the evidence base for the new Local Plan and it will be progressed to full supplementary planning document status.
- 4.30. The Framework discusses the vision and spatial strategies for the New Cross area and includes a detailed consideration of the sites being evaluated for the new station as part of the Bakerloo Line Extension (BLE). This includes the Sainsbury's site at New Cross Gate.
- 4.31. The options considered for the Sainsbury's site, referred to as the Hatcham Works site, include the re-provision of a supermarket of circa 4,385m<sup>2</sup> (GEA, exclusive of service yard), together with residential and other commercial uses. While the floorspace figure confirms a full-sized supermarket should be included on site, the floorspace figure was not derived from discussions with Sainsbury's and does not fit with Sainsbury's standard formats. Indeed, for reasons explained in this Statement, Sainsbury's do not want to reduce the size of their store. Sainsbury's want to increase its size in order to provide a better comparison and GOL offer.
- 4.32. If Sainsbury's were to provide a smaller (than existing) store in line with company standards, it would instead be a Sainsbury's Local format store which will not fulfil the same role or function in meeting bulk shopping needs that the existing store provides. Further, a Sainsburys Local store would not provide GOL services. Therefore, the provision of a smaller Sainsbury's store on site will result in a material worsening of the accessibility to grocery shopping needs for the local community.

### **Policy Summary**

- 4.33. There are clear and consistent policy expectations, expressed through national and local policy documents, in relation to this site:
- The vitality and viability of district centres and their role in meeting local community needs should be protected and enhanced through new development proposals;
  - Well designed and integrated residential uses are appropriate and encouraged to support the vitality and viability of town centres (including district centres);
  - Major development proposals, with valuable investment and regeneration potential, should be accommodated within town centres in line with NPPF objectives; and
  - The Sainsbury's site is an identified regeneration area which is suitable and indeed allocated for new mixed-use redevelopment including new retail to improve the district centre and housing development.
- 4.34. In short, the proposals are not only entirely consistent with the policy intention for the site, but will pro-actively deliver quality mixed-use development to fulfil key planning policy objectives and aspirations.

## 5. The Retail Context

- 5.1. WSP Indigo prepared an initial retail impact note in respect of the site and the redevelopment proposals to assist the Council in its early consideration of the proposed scheme.
- 5.2. This initial assessment used information from the Lewisham Retail Capacity Study (LRCS) 2017, which is the retail evidence base for Lewisham's new Local Plan. WSP Indigo's initial impact note assessed the loss of the Sainsbury's on New Cross/New Cross Gate District Centre. These initial findings have been revisited in light of the results of more up-to-date surveys, as outlined in Sections 6 and 7.
- 5.3. In this Section, we review the findings of the LRCS 2017 as they relate to the proposals. We go on to summarise the findings of our initial impact note.

### Lewisham Retail Capacity Study 2017

- 5.4. The Lewisham Retail Capacity Study 2017 (LRCS) was prepared to provide an up-to-date assessment of the 'need' for additional retail floorspace in the Borough as well as an assessment of the performance of its two major town centres of Lewisham and Catford, and network of seven district centres, including New Cross/New Cross Gate.
- 5.5. The LRCS 2017 identifies a convenience goods capacity of approximately 9,300sqm – 12,700sqm net (depending on commitments) across the Borough by 2033 and recommends that a large proportion of the capacity should be provided by 2021 to serve an immediate demand. This estimate may be considered conservative as it was produced before the publication of the Draft London Plan and the proposed increase in housing targets.
- 5.6. When assessing the health of New Cross/New Cross Gate District Centre, the LRCS 2017 considers that the mix of convenience uses in the centre is '*relatively strong*', and notes that its current convenience offer is '*headed*' by the existing Sainsbury's store. In overall health terms, the District Centre is regarded to be popular and well used, and that it is a bustling, diverse centre with generally positive levels of vitality and viability.
- 5.7. In accordance with the London Plan and Local Plan definitions for District Centres (which identify a floorspace range of 10,000 – 50,000sqm retail, leisure and service floorspace), we note that New Cross/New Cross Gate District Centre comprises 48,180sqm gross floorspace, of which 28,680sqm is in use for retail or service uses or is vacant.
- 5.8. The centre has a vacancy rate of 15.4%, which is above the UK average of 11.2%. On this basis, the LRCS 2017 recommends that the:
- Council should continue to support this whilst protecting, and where possible enhancing, the range of retail facilities available in the centre.' (paragraph 11.6 Recommendation NCDC01. LRCS 2017)
- 5.9. The LRCS 2017 makes a number of observations about the established Sainsbury's store. It states that the Sainsbury's store "*acts as the anchor store*" in the District Centre as it provides the main convenience goods offer as well as a range of non-food products (paragraph 6.88). It further confirms that the store offers a range of goods which are not provided by specialist retailers elsewhere in the centre, and that the existing Sainsbury's car park is the only public car park within the District Centre.
- 5.10. However, it should be highlighted that whilst the car park is open to the public, it is restricted

to 3 hours free parking only. .

- 5.11. Paragraph 6.19 further notes that there was:

*'a stream of pedestrian activity to and from the Sainsbury's store'.*

- 5.12. Paragraph 11.61 concludes that Sainsbury's:

*"makes an important contribution in meeting local residents' convenience goods shopping needs – as the only large supermarket serving the local area – and to the overall vitality and viability of the centre." (Our emphasis added).*

- 5.13. In summary, the Council's evidence base acknowledges the importance of the store to the District Centre and to the local community in meeting convenience goods needs. It also confirms the links between the District Centre and the Sainsbury's store; and the importance of the Sainsbury's car parking provision for the District Centre. It follows that any actions which undermine the role or function of the Sainsbury's store will have an adverse impact on the District Centre and on the opportunities for the local community to meet main food shopping needs.

### **WSP Indigo's Initial Retail Analysis**

- 5.14. As part of pre-application discussions in respect of the proposals, WSP Indigo prepared initial retail analysis to demonstrate the case for supporting a new, high quality development in this location, including an expanded and relocated Sainsbury's store. This preliminary analysis utilised the findings of the LRCS 2017 and is provided in summary below.

#### The Role of the Existing Sainsbury's Store

- 5.15. The existing Sainsbury's store is located within Zone 2 of the LRCS 2017 Study Area (see Appendix 2) and survey data confirms that it is one of the most popular stores within this zone, drawing 10.5% of convenience market share. It is only marginally beaten, in market share terms, by Morrisons in Peckham (11.3%). The data also confirms that Sainsbury's draws 85% of its turnover from Zone 2, underlining its role in meeting local convenience needs.
- 5.16. Indeed, Sainsbury's own data reinforces these results, indicating that over 50% of the trade of the store comes from within a 0-5 min drivetime (which is smaller than Zone 2).
- 5.17. The main competitors to the store are all located outside the Borough, and include Morrisons in Peckham town centre, Aldi on Old Kent Road and Tesco in Surrey Quays. These are all located within the adjoining London Borough of Southwark, but they provide the closest main food shop alternatives to residents of New Cross. It follows that, if Sainsbury's, New Cross Gate were to close, these Southwark stores are the most likely stores to capture the diverted expenditure, resulting in higher expenditure leakage from the Borough and less sustainable travel patterns.
- 5.18. The LRCS 2017 notes that the Sainsbury's store has a net floorspace of 3,539 sqm, including 2,555 sqm convenience goods floorspace. Based on company average figures in 2015, the LRCS 2017 calculates that the store has a benchmark turnover of £30.7m. Based on the Council's household survey, the store was estimated to have a turnover of £23.9m in 2015 and therefore, assumed to be trading slightly below a company average figure. However, the LRCS 2017 assessment of the store's turnover excluded turnover from online sales, which will be included in the calculation of the company average turnover. If online sales are included, the turnover would be higher than the company average.
- 5.19. Sainsbury's confirm that the store's turnover (and convenience goods floorspace) is higher

than that estimated in the LRCS 2017.

#### Convenience Goods Impact

- 5.20. The LRCS 2017 estimates that the convenience turnover of New Cross/New Cross Gate District Centre will be £36.4m at 2021. As shown in Figure 2 below, this includes the Sainsbury's store which accounts for two thirds (66%) of the convenience turnover of the centre (ie £24.2m in 2021).

**Figure 2: Convenience Turnover of New Cross/New Cross Gate District Centre at 2021**

	Turnover 2021 (£m)
Sainsbury's, New Cross Gate	24.20
Other convenience stores	12.20
Total, New Cross/New Cross Gate District Centre	36.40

Notes: Turnovers based on Table 5B of Appendix II of LRCS 2017 (2013 prices)

- 5.21. Therefore, based on the LRCS 2017 findings, should Sainsbury's cease trading at the site entirely, its closure will reduce the convenience turnover of the District Centre from £36.40m to £12.20m at 2021, resulting in a convenience impact of 66% at 2021.
- 5.22. A reduction in turnover of £24.20m, or 66%, is undoubtedly 'significant' and would have a critical impact on the convenience turnover District Centre. Indeed, the loss of this trade, employment and access to local facilities would contradict the Borough's intention to encourage an increase in residential development and employment opportunities with this London Plan Opportunity Area.

#### Comparison Goods Impact

- 5.23. The LRCS 2017 also estimates the comparison turnover of the existing Sainsbury's store and New Cross District Centre as shown in Figure 3 below for 2021.

**Figure 3: Comparison Turnover of New Cross/New Cross Gate District Centre at 2021**

	Turnover 2021 (£m)
Sainsbury's, New Cross Gate Retail Park	3.04
Other including retail warehouses	19.96
Total	23.00

Notes: SSL turnover based on SSL data at 2018, allowing for floorspace efficiencies (RPBN 16) to 2021.

- 5.24. In terms of comparison goods impact, the closure of the Sainsbury's store will reduce the comparison turnover of the centre by £3.04m, having a 13% impact on the District Centre at 2021. This impact would be further compounded by the loss of the retail warehouse units (however, these are not identified separately within the LRCS 2017).

#### Total Impact

- 5.25. Combining the convenience and comparison impact enabled us to estimate the total retail impact on the District Centre. As shown in Figure 4, the total closure of the existing Sainsbury's store would, based on LRCS 2017 figures, have a total impact of 46% on the District Centre. Notably, this does not include the impact arising from the loss of the New Cross Gate Retail Park.

**Figure 4: Total Retail Impact of the loss of Sainsbury's**

New Cross District Centre	Turnover 2021 (£m)	Loss of Sainsbury's Store (£m)	Residual Turnover 2021 (£m)	Impact %
Convenience Turnover	36.40	24.20	12.20	66%
Comparison Turnover	23.00	3.04	19.96	13%
<b>Total</b>	<b>59.40</b>	<b>27.24</b>	<b>32.16</b>	<b>46%</b>

### Summary

- 5.26. The findings of the Council's retail evidence base, the LRCS 2017, conclude that the existing Sainsbury's is an important anchor store for New Cross/New Cross Gate District Centre, generating around 46% of its turnover, and playing the principal role in meeting main food grocery needs for the local community.
- 5.27. Our initial estimates, based on the LRCS 2017, indicated that the closure of the Sainsbury's would result in a convenience impact of 66% and a total retail impact of 46% on the District Centre at 2021. Importantly, it would result in the loss of a key anchor store and main food shopping facility for the local community.
- 5.28. Our preliminary analysis concluded that the closure of the Sainsbury's store would result in a 'significant adverse impact' on the District Centre, which would conflict with national and local planning policy.

## 6. The Survey Analysis

- 6.1. WSP Indigo commissioned four bespoke surveys to clearly and thoroughly establish the role of the existing Sainsbury's store in meeting the convenience needs of the local community and as an anchor for the New Cross/New Cross Gate District Centre. The surveys undertaken were:
- A telephone survey of 500 households within a defined Study Area undertaken in January 2019;
  - An exit survey of 75 shoppers at the existing Sainsbury's store in January and February 2019;
  - An exit survey of 50 people undertaken at the New Cross Retail Park undertaken in February 2019; and
  - An on-street survey of 81 people within New Cross/New Cross Gate District Centre undertaken in February 2019.
- 6.2. The surveys provide a thorough overview of existing shopping habits, connections and links in the District Centre. Notably the surveys were commissioned at the request of the Council, despite having their own relatively recent survey evidence.
- 6.3. The surveys produced extensive data, but key results are summarised below.

### Household Telephone Survey

- 6.4. Household telephone surveys are typically undertaken to examine the convenience and comparison shopping habits of residents within a defined catchment area. They enable us to establish the popularity and performance of existing food stores within the catchment and provide an understanding of how, where, why and when people do their food and non-food shopping. These patterns inform our assessment of the likely changes when a new scheme is delivered.
- 6.5. In this instance, the household survey area was defined having regard to the findings of the LRCS 2017 which confirmed that the existing Sainsbury's store at New Cross Gate draws the majority of its trade from Zones 1 – 4 of the LRCS 2017 Study Area, and most particularly from Zone 2. For consistency, we have adopted the same Zones 1 – 4, as shown on the attached Study Area Plan at **Appendix 2**. The zones are as follows: Zone 1 – Rotherhithe and Deptford; Zone 2 – Peckham (also including New Cross/New Cross Gate); Zone 3 – Lewisham; and Zone 4 which includes Greenwich town centre at its northern end.
- 6.6. Our approach uses the market shares identified by the household survey to estimate store turnover, based on estimates of available spending potential. This information is used to determine the relative popularity and trading performance of stores and the degree of expenditure leakage from the Study Area. The LRCS 2017 used the same approach.
- 6.7. Our quantitative tables are provided at **Appendix 3** and explained in further detail below.

### Market Shares and Turnover Results

#### Main Food Market Shares

- 6.8. In respect of their main food shopping patterns, the survey asked respondents to identify

where they last did their main food shop and where else they undertake their main food shop. This recognises that since the 2008 recession, shopping habits have altered. Shoppers are less 'brand loyal' and they do not always undertake main food shopping at one destination. The response to the first question is considered to be the respondent's primary destination for main food shopping, and their response to the second question is considered to be their secondary destination. To incorporate the results into our quantitative model, we have weighted the responses to primary and secondary destinations on a 70%:30% basis.

- 6.9. The results of the household survey confirm the LRCS 2017 results that the existing Sainsbury's store at New Cross Gate is an important store in meeting main food grocery needs within the Study Area. In particular, the results indicate that in terms of which store respondents last visited for their main food shop (Q1), Sainsbury's captures the largest main food market share (12.39%) within Zone 2, followed by Morrisons in Peckham (10.76%) and then Aldi on the Old Kent Road (8.19%).
- 6.10. To obtain a fuller understanding of where residents' money is spent, we have combined the residents two stated main food shopping destinations (Q1 and Q6). Combining these results shows that, the existing Sainsbury's captures a market share of 13% of the total main food expenditure in Zone 2.
- 6.11. Across the wider Study Area (Zones 1 – 4), the results confirm that, in terms of respondents' preferred main food shop location, the Sainsbury's store captures a main food market share of 5.2%, which is below that of Tesco Extra at Surrey Quays (10.9%) and comparable to the Tesco superstore at Lewisham, but ahead of any other individual foodstore retailer. Combining the results of the preferred and secondary locations shows that the Sainsbury's captures a market share of 5.5% across the Study Area (please see Tables 3a and 5a of **Appendix 3** and Figure 5 below).

#### Top-up Market Shares

- 6.12. The same methodology and weightings for primary and secondary destinations explained above are used in respect of top up shopping responses.
- 6.13. In terms of top-up shopping, the Sainsbury's store is again relatively popular. Along with Morrisons in Peckham it is the most popular named retail destination in Zone 2, but as would be expected, the number of locations for top-up shopping is much greater and shopping patterns are more dispersed. Overall, the store attracts less than 3% of the total top up spending.

#### Total Convenience Market Shares

- 6.14. In terms of total convenience market share (main food and top up shopping combined), the results shown at Table 8a in **Appendix 3** and Figure 5 below reveal that the Sainsbury's store at New Cross Gate achieves one of the highest market shares (4.8%) across the Study Area, only falling behind Tesco Extra at Surrey Quays (7.7%).

**Figure 5: Convenience Market Shares Across the Study Area**

	WSP INDIGO HOUSEHOLD SURVEY 2019		
	Main Food Market Share (%)	Top-Up Market Share (%)	Total (Main and Top up) Market Share (%)
Tesco Extra, Surrey Quays	9.3%	5.9%	7.7%
Sainsbury's, New Cross Gate	5.5%	2.8%	4.8%
Tesco, Lewisham	5.4%	2.9%	4.7%

### Convenience and Comparison Turnovers

- 6.15. Applying the market share approach, the survey results translate into a total convenience turnover at Sainsbury's New Cross Gate (based on a main and top up food split of 70%:30%) of £32.08m at 2019, rising to £33.03m at 2021. This is higher than the findings of the LRCS 2017 which estimated the turnover of the store at £23.0m in 2016 and £24.6m in 2021 (when rebased to 2017 prices). This difference is partly attributed to an increase in available expenditure identified by the updated data, and partly attributed to an improved market share for Sainsbury's New Cross Gate shown in the updated survey.
- 6.16. The results further indicate that the turnover of 'other' convenience facilities within New Cross/New Cross Gate District Centre is lower than that estimated by the LRCS 2017. Our results show that the turnover of other facilities within the District Centre (including the Sainsbury's Local, Iceland and smaller independent shops) is £5.92m in 2019, compared to the LRCS 2017 estimate of £11.5m in 2016 (or £11.96 in 2019). A decline in market share largely explains the turnover differences.
- 6.17. In broad terms, these findings suggest that there has been a redistribution of convenience expenditure of approximately £5.6m from 'other' convenience facilities in New Cross/New Cross Gate District Centre to the Sainsbury's store since the LRCS 2017 was undertaken in October 2017. However, the convenience turnover for the District Centre overall (Sainsbury's + 'other' stores) has increased. Our results show a total convenience turnover of £38.0m in 2019, compared with the LRCS 2017 results of £35.91m (see Figure 7 below).
- 6.18. We have tried to remain consistent with the LRCS 2017 to enable a 'like for like' comparison. Nevertheless, the differences between the turnover figures identified above can be explained, at least partly, due to the inevitable differences between surveys, and partly that our survey was specifically designed and focussed on the shopping patterns within the local New Cross Gate area (while the LRCS 2017 had a wider focus). Differences in population and expenditure data, updated retail assumptions and some changes in market shares have also contributed to the different results. Ultimately, the surveys designed by WSP Indigo were undertaken at the request of the Council to ensure that the most up-to-date data was being used and are bespoke to the scheme under consideration. The LRCS 2017 surveys had a broader focus and the Council wanted WSP Indigo to use bespoke surveys.
- 6.19. Turning back to the turnover results, the survey shows that the comparison floorspace at Sainsbury's New Cross Gate is turning over at £8.19m in 2019, rising to £10.10m by 2024. The comparison turnover of the rest of the District Centre (including New Cross Retail Park) is estimated at £15.73m in 2019, rising to £19.43m in 2024. This translates into a total comparison turnover for the District Centre of £23.92m in 2019, rising to £29.54m in 2024, of which Sainsbury's accounts for 34% (see Table 10a and 10b of **Appendix 3**).
- 6.20. The LRCS 2017 indicates that New Cross/New Cross Gate District Centre has a comparison turnover of £19.1m in 2016, £23.1m in 2021, and £27.9m in 2026 (when rebased to 2017 prices). These are slightly lower, though not significantly different, to our more recent results.

**Figure 6: Turnover Summary – 2019 estimates**

<b>New Cross/New Cross Gate District Centre</b>	<b>LRCS 2017 (£m)</b>	<b>WSP Indigo 2019 (£m)</b>	<b>Difference (£m)</b>
<b>Convenience</b>	<b>35.91</b>	<b>38.00</b>	<b>+2.09</b>
Sainsbury's, New Cross Gate	23.95	32.08	+8.13
Other Convenience Stores, New Cross DC	11.96	5.92	-6.04
<b>Comparison</b>	<b>21.51</b>	<b>23.92</b>	<b>+2.41</b>
<b>Total</b>	<b>57.42</b>	<b>61.92</b>	<b>+4.50</b>

LRCS 2017 figures have been interpolated to 2019 and converted to 2017 prices.



- 6.21. **Figure 6** above indicates that there has been a minor increase in total convenience and comparison turnover of the District Centre since the LRCS 2017, resulting in an overall increase in the District Centre turnover of around £4.5m. The change in turnover represents an 8% increase.
- 6.22. In short, our results indicate that the existing Sainsbury's store is now even more valuable to the District Centre as an anchor than at the time of the LRCS 2017.
- 6.23. Notably, the turnover figures outline above exclude turnover from online shopping. This is explained, and quantified, below.

#### Online Shopping

- 6.24. The way Sainsbury's online offer functions is that an online shopper can only purchase goods that are in stock within the store that sources their delivery. In other words, the range of goods within the store determines the range of goods available to local online shoppers. As explained in Section 3, one of the key challenges faced by the existing Sainsbury's store is its constrained capacity to service 'goods online' (GOL) orders. Providing online shopping is sustainable and reduces car use.
- 6.25. Question 1 of the household telephone survey shows that currently 12.7% of respondents use the 'internet' for their main food shopping needs. This equates to some £56m across the Study Area in 2019 and at a constant market share, it is anticipated to exceed £60m by 2024. While the 'internet' response encompasses all retailers offering GOL services, it is the single largest market share across the Study Area. Of course, most experts expect that online shopping will increase over time so its contribution to meeting food shopping needs is likely to increase, provided there are adequate facilities to meet the online demand.
- 6.26. Q1A identified that around 20% of 'main food' internet shoppers within the Study Area used Sainsbury's (behind Ocado 35% and Tesco 25%). Within Zone 2, the proportion using Sainsbury's for online shopping was much higher at 42.5%. Although the data is not store-specific, Sainsbury's advise that GOL territories are, where possible, based on the shortest and most efficient delivery routes; and for this reason, we can reasonably conclude the established Sainsbury's store provides an important online service to local residents.
- 6.27. In short, if the GOL provision is currently inadequate at the store, and the consequence is an increase in miles travelled by delivery vans, the sustainability benefits of the service are obviously and significantly diminished. It is essential to have the GOL hub in the most logistically efficient location. The new store will significantly improve Sainsbury's capacity to service its GOL customers far more effectively and efficiently.

#### **Shopping Habits and Characteristics**

- 6.28. In addition to understanding the relative performance of stores, the household survey provides insightful data on how shoppers use the Sainsbury's store at New Cross Gate for their shopping needs. While the data is available for many stores, this analysis inevitably focusses on Sainsbury's at New Cross Gate.

**Figure 7: Frequency of Visits**

Frequency	
1 x week/ fortnight	81%
More Frequently	11%
Less Frequently	11%
Never	0%

**Figure 8: Mode of Transport**

Transport	
Car/Taxi	58%
Public transport	24%
Walk/cycle	18%

- 6.29. Figures 7 and 8 show that for main food shopping, the majority of people shopped once a week or fortnight, and most travel by car. In broad terms, this is not an unusual finding in respect of a large foodstore catering to main food shopping needs. However, the incidence of people walking/cycling or using public transport to undertake a main food shop is higher than we would normally expect to see (at 42% combined), reflecting the store's London catchment and the greater reliance on alternative transport options. This is likely to increase further with the store being brought closer to the public transport links within the New Cross/New Cross Gate District Centre; heightening the sustainability benefits of the store and its capacity to provide for those residents with restricted accessibility options.
- 6.30. Those respondents who identified Sainsbury's New Cross Gate as their main food shopping destination were asked to identify the main reason they choose this store. Some 47% indicated that it was convenient to home or work; 33% related it to the range and quality of goods; and 10% indicated a preference for the retailer/reward scheme.
- 6.31. Sainsbury's shoppers were also asked to identify what they dislike about the store. Some 68% said 'nothing'; and 17% related it to layout issues such as it being too small, too busy, a lack of product on shelves and limited range of stock.

#### Linked Trips

- 6.32. Linked trips are relevant consideration in the assessment of impact as they provide an indication of the value of an anchor store, to other facilities within the centre. They essentially refer to the trips that are made at the same time as – either before or after – the trip which is principally motivated by the need to visit the foodstore.
- 6.33. Linked trip evidence can be extracted from the household survey results through cross tabulation analysis. This analysis identifies that of all the shoppers using Sainsbury's New Cross Gate for main food or top-up shopping purposes, 14% link their shopping trip to Sainsbury's with a visit to another facility or business within the District Centre. We consider this result alongside the linked trip data extracted from the on-street surveys below.

### **Sainsbury's Store Exit Survey**

- 6.34. Similar questions relating to shopping habits were asked as part of the exit survey at the existing Sainsbury's store at New Cross Gate. The results are outlined below.

#### **Shopping Habits and Characteristics**

- 6.35. In addition to questions regarding their frequency of visit and their mode of transport, the exit survey also asked people about their level of spending at the store.

**Figure 9: Spending During Visit**

Spending	
£0-£19	37%
£20-£39	28%
£40-£59	13%
£60+	22%

**Figure 10: Frequency of Visit (for main food shopping)**

Frequency	
1 x week/ fortnight	46%
More Frequently	7%
Less Frequently	15%
Never	32%

**Figure 11: Mode of Transport**

Transport	
Car/Taxi	39%
Public transport	32%
Walk/cycle	29%

- 6.36. Figures 9 - 11 show that of the shoppers surveyed, 35% spent over £40, and 53% visit at least once a week, confirming its role as a main food, shopping destination. However, more than 60% of visitors arrived by public transport or walking/cycling to the store, and 32% of people indicated that they 'never' use the store for their main food shopping. These results suggest that, in addition to its role as a main food destination, the store may also be used by local workers and visitors to the centre (particularly given its proximity to the train station) who do their main food shopping elsewhere. It may also indicate that some local residents do not do a 'traditional' one-off main food shop and instead, given that they rely on walking or public transport, do regular smaller shops to meet their grocery needs.
- 6.37. Shoppers were asked to identify the main reason for using the Sainsbury's store at New Cross Gate, with results confirming its convenience to home (57%) and convenience to work (12%) were important factors. These results once again underline the importance of the store to the local community, and the importance of its accessibility.
- 6.38. When asked about the one thing they most dislike about this Sainsbury's, 25% of the respondents said it was too expensive, 25% were unhappy that the product location was constantly changing, and 14% said that it included limited goods. Other responses included lack of stock on shelves, out of date products and trolleys jammed together.
- 6.39. Survey respondents were also asked about what they like about New Cross/New Cross Gate District Centre. The majority of respondents indicated its proximity to home (65%) or work (11%). It is reasonable to conclude that the District Centre, including the Sainsbury's store, is an important hub for the shopping needs of the local community.

#### Linked Trips

- 6.40. The linked trip evidence from the store exit survey indicates that only 4% of shoppers intended to link their trip with New Cross/New Cross Gate District Centre on the day of the survey (see Question 14). However, it is relevant that it was raining on the day of the survey and this could have had an influence on the propensity of shoppers to undertake a linked trip. Indeed, Question 16 also asked if respondents ever undertook a link trip between the Sainsbury's and District Centre and if so, how often. This identified that 52% of people link their trip to Sainsbury's with New Cross/New Cross Gate District Centre at some point. Just over 9% said frequently, and 41% said rarely. This establishes a clear relationship between the Sainsbury's store and the wider District Centre.

### **New Cross Gate Retail Park Survey**

- 6.41. A shopper survey of 50 people within the car park in front of the New Cross Gate Retail Park was also undertaken.

## Shopping Habits and Characteristics

- 6.42. Question 1 and 2 of the shopper survey examined the reasons for which people were at New Cross Gate Retail Park on the day of the survey. For 30% of visitors, the main reason for being there was to undertake main food or top-up shopping at Sainsbury's. A further 28% were there for non-food shopping purposes and another 28% were there to 'browse'. The remainder 14% were there for work/business, social reasons or to access other services.
- 6.43. Figures 12 - 14 look at the same shopping habits and characteristics we examined in respect of the other surveys.

**Table 12: Spending Habits**

Spending	
Nothing	47%
£1-£19	12%
£20-£39	18%
£40-£59	22%
£60+	0%

**Table 13: Frequency of Visit**

Frequency	
1 x week/ fortnight	22%
More Frequently	10%
Less Frequently	45%
First time today	22%

**Table 14: Mode of Transport**

Transport	
Car/Taxi	34%
Public transport	52%
Walk/cycle	14%

- 6.44. More than half of the shoppers surveyed had travelled to the site via public transport, including 32% by bus and 20% by train, once again reflecting the very high level of public transport accessibility of the site. Around one-third of shoppers (34%) had travelled by car, with more than half (56%) parking at Sainsbury's.
- 6.45. Some 32% of shoppers indicated that they regularly visit New Cross Gate Retail Park, including once a fortnight or more regularly. This increased to 50% when considering the frequency of once a month or more regularly.
- 6.46. Around 30% of shoppers at New Cross Retail Park indicated that they use the Sainsbury's store for their main food shopping needs. The main reason for doing so was its convenience to home and work (68%). When asked what they most disliked about the store, 76% said 'nothing', 17% said 'limited range of goods' and 6% said it was 'too expensive'.

### Linked trips

- 6.47. The degree of links between New Cross Gate Retail Park and Sainsbury's is reinforced by these results which showed that 32% of shoppers 'always' or 'frequently' combine a trip to both Sainsbury's and the Retail Park. Taking into account that a further 38% indicated that

they 'rarely' combine the trip, the results show that around 70% of shoppers surveyed combine their trip at some point.

- 6.48. Notably, 28% of shoppers also intended to combine their trip to the Retail Park with a trip to the wider New Cross/New Cross Gate District Centre, confirming an established link between the site and the rest of the District Centre. More than one-third (36%) confirmed that they 'always' or 'frequently' combine a trip to the Retail Park with a trip to the District Centre. Up to 76% combined a trip at some stage (citing 'always', 'frequently' or 'rarely').
- 6.49. This is relevant as it confirms that there are established links between the wider Sainsbury's site and the District Centre, with people undertaking linked trips between both the Retail Park and the District Centre; and the Sainsbury's store and the District Centre. The higher degree of links between the New Cross Gate Retail Park and the District Centre (compared to Sainsbury's) may be explained by the fact that the Retail Park is closer to and has a better relationship with the District Centre. The proportion of people linking their trips indicates that there will be an increase in linked trips between the Sainsbury's store and the District Centre once the store is moved closer to the front of the site.

### The District Centre Survey

- 6.50. Finally, a street survey of 81 people within New Cross/New Cross Gate District Centre completes the analysis of the relationship between Sainsbury's and the District Centre.
- 6.51. Over half (53%) of respondents interviewed indicated that they would visit Sainsbury's as part of their visit to the District Centre on the day of the survey (Questions 1, 2 and 7). Some 22% indicated that visiting Sainsbury's was their main purpose for visiting the District Centre. This highlights the importance of Sainsbury's as an anchor for the District Centre.

**Table 15: Spending Habits**

Spending	
Nothing	17%
£1-£19	42%
£20-£39	18%
£40-£59	15%
£60+	8%

**Table 16: Frequency of Visit**

Frequency	
1 x week/ fortnight	31%
More Frequently	49%
Less Frequently	6%
First time today	0%
Never	14%

**Table 17: Mode of Transport**

Transport	
Car/Taxi	12%
Public transport	51%
Walk/cycle	37%

- 6.52. The survey results indicate relatively low levels of spending, with close to 60% of people spending less than £20. However, people are visiting regularly, with around 80% of people visiting once a week or more frequently. In terms of transport, again the results identified a high proportion of respondents walking or cycling (37%) or using public transport (51%) to visit the District Centre.
- 6.53. The remaining 12% arrived by car, and 90% of whom parked at Sainsbury's or New Cross Gate Retail Park, confirming the role of Sainsbury's and the Retail Park in providing parking for the rest of the District Centre.
- 6.54. Of those people visiting Sainsbury's on the day of the survey (Question 9), 42% are regularly use Sainsbury's for their main food shopping. While this confirms the 'local resident' element, it further indicates that a meaningful proportion of respondents were in the District Centre to visit Sainsbury's (and potentially, other services) despite it not being their 'usual' main food shopping destination.
- 6.55. The Sainsbury's shoppers were asked to identify the main reasons for choosing the New Cross Gate store for their main food shopping. Almost half (49%) said 'convenience to home/work'; a further 13% said that it was easy to get to; 10% indicated that it was better value for money; and a further 10% indicated that it was for the range and quality of goods. The remaining 12% gave a range of reasons, including the petrol filling station, habit and the availability of good/cheap parking.
- 6.56. Those respondents were also asked to identify what they most disliked about the Sainsbury's store. The results included 'lack of stock on shelves' (15.6%); 'limited range of goods' (12.5%); 'too small' (12.5%); 'poor internal layout' (3.1%); 'and queues at checkouts' (3.1%). In short, concerns relating to the size and format limitations of the store were common. The remaining respondents raised other matters.
- 6.57. Key suggestions for improvement included a wider non-food goods range (25%) and an improved food range (22%).

#### Linked trips

- 6.58. More than half (52%) of respondents indicated that they 'always' or 'frequently' combine a trip to the District Centre with a trip to Sainsbury's (Question 10). A further 20% combine a trip 'rarely', indicating that over 70% of respondents combine a trip between the District Centre and Sainsbury's at some point.
- 6.59. Just over a quarter (27%) of respondents indicated that they would be combining their trip to the District Centre with a trip to the New Cross Gate Retail Park (Question 11) on that day. A small proportion of these people were not combining this visit to the Retail Park with a trip to Sainsbury's. This indicates that there is also a separate, established link between the Retail Park and the District Centre. In total, almost three-quarters of survey respondents (74%) were combining a trip between the District Centre and either Sainsbury's or the Retail Park. This highlights the importance of the links between the District Centre and the wider Sainsbury's site.

### **Summary and Conclusions**

- 6.60. There is a clear consistency between the surveys in several respects:
- The Sainsbury's store has a very important role in meeting the needs of the local community and workforce, with its 'convenience to home or work' consistently identified as the principal reason for visiting the store;
  - There is a very high incidence of respondents walking, cycling or using public transport to access the Sainsbury's store and the District Centre (between 60% and 70%), which is

clearly reflective of its high levels of accessibility. These results highlight the importance of the accessibility of this store to the local community through means such as walking and public transport;

- The Sainsbury's car park is well used by visitors to the wider District Centre. Its loss will be likely to lead to the loss of trade to the District Centre;
- Key shortcomings identified by users of the Sainsbury' store included its limited range of goods and layout issues, such as being too small and too busy; and
- All surveys establish a good links between the Sainsbury's store and the wider District Centre.

6.61. The redevelopment proposals will largely address the qualitative short comings of the existing Sainsbury's store identified by the surveys, and will deliver a larger, refreshed store, with an improved shopping environment and considerable improvements in terms of store efficiencies and operations. It will also considerably expand the non-food comparison offer at the store, in line with Sainsbury's latest format. The proposals will, therefore, reinforce the role of Sainsbury's as the anchor for the District Centre well into the future. It will improve the accessibility of the store while maintaining the important District Centre car parking provision.

6.62. The results of the in-centre survey show that just over half (53%) of the people interviewed in the District Centre on the day of the survey intended to link their trip with a visit to Sainsbury's. This is a very clear and indisputable link between the District Centre and the existing store, which underlines the importance of the store in anchoring the centre.

## 7. The Impact Assessment

- 7.1. It would not normally be necessary to test impact for a scheme located within an allocated District Centre. In this case, the redevelopment proposals will deliver improved retail floorspace and high-density residential development in a highly sustainable, town centre location. As it complies with national policy aspirations, it should be supported.
- 7.2. However, at the request of the Council, we have undertaken a bespoke impact assessment. The Council have asked us to address three scenarios in which Sainsbury's and the New Cross Gate Retail Park are:
- Lost and not replaced – Scenario 1;
  - Replaced by a Sainsbury's Local format store - Scenario 2; or
  - Replaced by a better more appropriate Sainsbury's store, with an improved comparison goods offer and improved facilities compared to the existing store - Scenario 3.
- 7.3. The associated quantitative impact assessment tables are provided at **Appendix 3** and are explained below.

### Quantitative Impact Assessment

- 7.4. As discussed in the previous Section, this assessment has been informed by up-to-date survey information and updated population and expenditure data and retail assumptions. As noted, WSP Indigo has commissioned four surveys to understand the role, function and extent of links between the established Sainsbury's store and New Cross/New Cross Gate District Centre.
- 7.5. The Study Area and the basis for its definition is explained in Section 6 and our Study Area Plan is provided at **Appendix 2**. The Study Area is consistent with zones used within the LRCS 2017 assessment to enable comparison between the results.
- 7.6. This assessment adopts a base year of 2019 and an assessment year of 2024. The price base is 2017.

### Population and Expenditure

- 7.7. **Tables 1** and **2** calculate the total available convenience and comparison goods expenditure available within the Study Area over the assessment period using updated population and expenditure data (provided by Experian) and growth rates from the latest Experian Retail Planner Briefing Note 16 (2018) to calculate and project growth in expenditure. This however does not include the housing commitments within the surrounding area as well as the proposed housing on the site.
- 7.8. To calculate comparison turnovers, we have used national average spending results to proportion comparison expenditure into the following categories as shown in **Tables 2b** and **2c** in Appendix 3:
- Clothing and footwear;
  - Chemist and personal goods;
  - Books, toys and gifts;



- Jewellery, china and glass;
- Household appliances;
- Furniture and furnishings; and
- Hardware and DIY products.

7.9. The Study Area is estimated to see a growth in convenience expenditure of almost £51m, and a growth in comparison expenditure of £285m, between 2019 and 2024. This is significant expenditure growth which indicates demand for additional retail floorspace over the period to 2024.

#### Convenience Turnovers

- 7.10. Tables 3 – 10 calculate the convenience turnovers of existing convenience facilities within the Study Area based on the main food and top-up shopping market shares derived from the household survey. In calculating turnovers, our assessment takes into account where respondents 'last' visited for their main and top-up food shopping needs, and 'their alternative destination for their food shopping needs. The combined results are used to calculate total store turnovers at **Tables 3 to 10** at 2019 and 2024.
- 7.11. The assumptions which underpin the calculations in **Tables 3 to 10** include a convenience expenditure split of 70%:30% between main food and top-up shopping, which is consistent with the LRCS. We have further adopted a 70%: 30% split between the primary and secondary main food and top up shopping destinations.
- 7.12. Based on Tables 3 to 8, **Tables 9a** and **9b** summarise the total convenience turnovers at 2019 and 2024 respectively.
- 7.13. The turnovers of the existing Sainsbury's store and other facilities within New Cross/New Cross Gate District Centre are of principal relevance to this assessment. **Table 9a** estimates that the existing Sainsbury's has a total convenience turnover of £32.08m and the New Cross/New Cross Gate District Centre has a total convenience turnover of £5.92m, combining to a total convenience turnover of £38.0m at 2019 for the District Centre. Collectively the facilities attract a total food market share of 5.6% across the Study Area.
- 7.14. **Table 9b** shows that in the absence of any redevelopment, the turnover of the existing Sainsbury's store would be expected to reach £34.36m by 2024, when the rest of the District centre is estimated to achieve a convenience turnover of £6.34m. Therefore, the total convenience turnover of the existing District Centre is expected to reach £40.7m in 2024, assuming no change to existing facilities.
- 7.15. **Tables 10a** and **10b** estimates the comparison turnover of the existing Sainsbury's store and comparison goods facilities within the New Cross/New Cross Gate District Centre at 2019 and 2024 respectively.
- 7.16. **Table 10** shows that the Sainsbury's store currently achieves a comparison turnover of £8.19m, rising to £10.10m in 2024. The turnover of the facilities within the remainder of the District Centre, including New Cross Gate Retail Park, is estimated to be £15.73m in 2019, rising to £19.43m in 2024. In total, the comparison turnover of the District Centre is estimated to be £23.92m in 2019, rising to £29.54m in 2024.
- 7.17. Figure 18 below, and **Table 11** in Appendix 3, summarises the convenience and comparison turnover estimates for facilities within New Cross/New Cross Gate District Centre.

**Figure 18: Convenience and Comparison Turnover Summary**

	2019			2024		
	Conv	Comp	Total	Conv	Comp	Total
Sainsbury's, New Cross Gate	32.08	8.19	<b>40.27</b>	34.36	10.10	<b>44.46</b>
New Cross Gate Retail Park	-	4.41	<b>4.41</b>	-	5.45	<b>5.45</b>
Other District Centre	5.92	11.32	<b>17.24</b>	6.34	13.98	<b>20.32</b>
<b>Total District Centre</b>	<b>38.00</b>	<b>23.92</b>	<b>61.92</b>	<b>40.7</b>	<b>29.54</b>	<b>70.24</b>

### Goods Online (GOL)

- 7.18. The Sainsbury's store turnover in Figure 18 above does not take into account internet sales. It is based on expenditure from shoppers physically visiting the store.
- 7.19. As outlined in previous sections, online orders for Sainsbury's are filled, and transacted, within established stores and, as such, contribute to store turnovers. Therefore, in terms of the technical aspects of the impact assessment, the internet sales for each individual store should be taken into consideration because company sales densities also include online sales. Therefore, to maintain technical correctness, the estimated store turnover should take into account online sales.
- 7.20. Within the household survey, those people who purchased main food and top-up goods online are classified separately (with responses given to questions Q1A, 6A, 14A and 18A).
- 7.21. For simplicity, we have only examined the contribution of online sales to the turnover of Sainsbury's at New Cross Gate. Smaller stores within New Cross/New Cross Gate District Centre will not offer online services through the store and it is not necessary to take online sales into account for other stores within the District Centre. Iceland does have an online service but was not identified in the survey as being a retailer from which online purchases were made. The contribution of online sales to other stores within the Study Area is not relevant to this bespoke analysis.
- 7.22. As previously identified, the existing Sainsbury's at New Cross Gate has limited GOL facilities. It currently only has a three GOL van capacity. Sainsbury's intend that the replacement store be able to accommodate 14 GOL vans, underlining the popularity and the growth potential for GOL service from this store.
- 7.23. The household survey indicates that Sainsbury's currently generates £2.1m from online sales at 2019. Discussions with Sainsbury's regarding the proposed improvements to the GOL services from 3 vans to 14 vans have informed our estimates of the likely uplift to online sales within the new store. We estimate that having a 14-van facility will allow Sainsbury's online trade to increase to around £11m.

### Total Turnover of the New Store

- 7.24. It is pertinent to note that we have assumed that the new Sainsbury's store will absorb the turnover of the existing store, rather than using a theoretical 'benchmark' based on company averages. Given that proposed Sainsbury's store will be located on the same site and that Sainsbury's seek continuous trading throughout the redevelopment, it is realistic to expect that the new store will trade at comparable levels to the existing store, with the exception of the changes to the GOL contribution and the uplift to the comparison goods turnover through absorbing some of the turnover of the New Cross Retail Park (explained below).

- 7.25. In calculating the turnover of the proposed Sainsbury's store in Table 12, we have made allowance for the closure of the New Cross Gate Retail Park. In this regard, we have assumed that the proposed Sainsbury's store will absorb 75% of the turnover of the New Cross Gate Retail Park on the basis that the improved Sainsbury's comparison goods offer, which will include its expanded Tu and Home offer as well as Argos, Oasis and Habitat concessions, will largely compensate for the loss of TK Maxx, Harveys and Dreams. Given the overlap in adult and children's clothing, homewares and soft furnishings and to a more limited extent, some furniture items, it is not unreasonable to expect that the proposed Sainsbury's store could capture the majority of the existing expenditure at the Retail Park.
- 7.26. The comparison turnover of the proposed store is, therefore, estimated to be £14.19m (£10.10m + 75% of £5.45m).
- 7.27. **Table 12** in Appendix 3 estimates that the total turnover of the proposed Sainsbury's store will be £59.67m in 2024, with £11.1m coming from online sales.

### Linked Trips

- 7.28. Finally, before assessing impact, a further relevant consideration in this case is the way in which the Sainsbury's store supports the District Centre through the generation of linked trips. As explained above, linked trips are those trips to the District Centre (and the associated 'spin off' expenditure) which are undertaken at the same time (before or after) a trip to the Sainsbury's store.
- 7.29. The various surveys undertaken to inform this analysis revealed a range of linked trip percentages. The District Centre survey identified linked trips of 52%; the Retail Park exit survey identified linked trips of 28% on the day of the survey; the household survey results showed linked trips of 14% and the store exit survey indicated 4% on the day of the survey. The variations in the overall results for the on-site surveys will be, at least in part, influenced by the weather conditions on the day of the survey. We know that the store exit survey was undertaken on a very wet day, with poor weather conditions which is likely to have reduced the number of people walking between the store and the District Centre. It is highly pertinent that more than half of the people interviewed within the District Centre (in more favourable weather conditions) indicated that they would link their trip with visit to Sainsbury's.
- 7.30. Taking into account the variation between linked trip results, we have used the household survey results to inform our linked trip assessment (at **Table 13**) as it represents a reasonable balance between other survey evidence. As noted, the store exit survey identified 4% linked trips (on a very wet day) and the adjoining Retail Park exit survey identified 28% linked trips (on a more favourable day). The mid-point between the two is 16%. As the household survey results are unaffected by weather conditions and slightly below the mid-point between the other survey evidence, it is our view that the household survey evidence provides a reasonable indication of the likely linked trips between the Sainsbury's store and the rest of the District Centre.
- 7.31. **Table 13** estimates the likely number of transactions per annum at the existing Sainsbury's store using store turnover information and average spend data derived from the Sainsbury's exit survey. The store turnover used excludes the online sales on the basis that online transactions do not generate linked trips.
- 7.32. **Table 13** estimates that on the basis of store turnover and average spend at the store, the existing store achieves around 1.064million transactions (or visitors) per annum. By 2024, this is estimated to increase to 1.164million transactions per annum.
- 7.33. Based on the estimated visitation numbers identified above, the linked trip data from the household survey (14%) and average spend data during the linked trip also derived from the Sainsbury's exit survey, **Table 13** estimates the current minimum value of the linked trips to the District Centre to be £3.23m per annum (and some 149,000 trips). Given the evidence, it

could be higher than this. For example, if this was based on the Retail Park exit survey figure of 28%, then this would equate to £6.46m.

- 7.34. Projecting forward, we have used the same methodology to estimate the value of linked trips at 2024. However, we have taken into account the fact that the proposed store will be much closer to the other parts of the District Centre, being located at the front of the site, and in a far better position to support linked trips. We have, therefore, assumed an uplift in the proportion of people linking their trips from the Sainsbury's store to the District Centre to 25%. In other words, we expect that the proportion of people undertaking linked trips between Sainsbury's and the District Centre will increase from 14% to 25% once the store is moved. The uplift to 25% is below the results of the Retail Park survey (which shows 28% linked trips) which is considered to be a reasonable benchmark as the new store will be closer to the rest of the District Centre than the existing Retail Park facilities.
- 7.35. On the basis of the uplift to 25%, the value of linked trips to the District Centre of the new store is estimated to be £6.95m (or 291,000 trips) in 2024. This represents a doubling of the linked trip expenditure to the District Centre, and an almost doubling in respect of trips (footfall).

### Impact Assessment

- 7.36. **Table 14** addresses the three impact scenarios identified by the Council. These are scenarios in which Sainsbury's and the New Cross Gate Retail Park are:
- Lost and not replaced – Scenario 1;
  - Replaced by a Sainsbury's Local format store - Scenario 2; or
  - Replaced by a better more appropriate Sainsbury's store, with an improved comparison goods offer and improved facilities compared to the existing store - Scenario 3.
- 7.37. Column A calculates the turnover of the District Centre at 2024 assuming a no development scenario and all existing facilities remain as they are now. This is the baseline or 'no change' scenario and is the appropriate basis on which to assess impact of any changes. Column A calculates that, at 2024, the turnover of existing facilities within New Cross District Centre would be £75.70m.
- 7.38. Column B assesses the change to the turnover of the District Centre if the existing Sainsbury's store and New Cross Gate Retail Park are redeveloped and not replaced at all. Column B estimates that this scenario would result in the loss of £55.38m from the District Centre, having an impact of -73.2%. Clearly, a negative impact of this magnitude will be significantly adverse for the Centre.
- 7.39. Column C assesses the impact if the existing Sainsbury's store and New Cross Gate Retail Park were replaced by a Sainsbury's Local store. We assume that a Sainsbury's Local format store will turnover at £3.04m per annum at 2017 prices based on a benchmark turnover.
- 7.40. Column C identifies a loss in turnover of some £52.34m and impact of -69.1%. Compared to scenario B above, the impact of this scenario is marginally offset by the turnover of the Sainsbury's Local store. The overall impact, however, remains significantly adverse.
- 7.41. Finally, Column D assesses the impact of the proposed development on New Cross/New Cross District Centre. While the proposed redevelopment will involve the loss of the New Cross Gate Retail Park, the results of Table 14 confirm that this is more than offset by the higher turnover of the new Sainsbury's store which is assumed to absorb 75% of the turnover of the Retail Park (given the overlap in product ranges) and the significant increase in the online turnover of the new store.

- 7.42. Overall, Column D estimates that the turnover of the District Centre with the proposed development will be £86.94m, an increase of £11.24m on the baseline scenario, having a **positive** impact of +14.9%.
- 7.43. The quantitative impact conclusions are clear. The only redevelopment solution that will not result in a significant adverse impact, in quantitative terms, on the New Cross/New Cross Gate District Centre is the replacement of the existing store with a new and improved, relocated store at the front of the site.
- 7.44. There are, however, other impact considerations that have not formed part of our quantitative model. In particular, the scheme also includes 1,161 new dwellings housing an estimated 1,974 new residents. Based on average expenditure, the new residential community could generate additional spending potential of some £3.6m convenience expenditure and £6.5m comparison expenditure which would be available to support the Sainsbury's store and other District Centre facilities.
- 7.45. There are also employment benefits, through construction and operation phases of the development, with an anticipated increase, in particular, in the employment requirement to support the enhanced online services at the store. The vast majority of Sainsbury's colleagues that work in store live locally so it is likely that the new jobs in the store will be taken up by local people. These are additional associated local economic benefits which must be accounted for in the assessment of the scheme.

### **Conclusions on Impact**

- 7.46. The results of the quantitative impact assessment are conclusive. The loss of the existing Sainsbury's store and adjoining New Cross Gate Retail Park, without replacement or replaced only by a small format Sainsbury's Local store, would result in a significant adverse impact of between -69% and -73% on the turnover of the District Centre. This is a loss in trade in the order of £52m to £55m. It would reduce the turnover of the District Centre from £73m to £20 to £23m. The loss of this proportion of its turnover is indisputably significantly adverse.
- 7.47. However, the potential impacts of the closure of the Sainsbury's store and the adjoining Retail Park are more than just quantitative. Consistent findings from the extensive survey work undertaken to support this assessment underline the importance of the accessibility of this store to the Study Area residents. The survey results discussed in Section 6 confirm a notably higher than average reliance on public transport, walking and cycling by Sainsbury's shoppers to obtain grocery shopping. The results further emphasised the 'convenience to home' of the store for many residents. As such, the loss of this store could have very significant implications for local residents and their ability to access basic convenience needs. There are limited alternative supermarkets and foodstores of a size that allows a shopper to undertake a weekly shop in the area. This means that the loss of the store would require many residents to travel further, at greater cost and inconvenience, to meet their grocery needs.
- 7.48. The loss of the existing store car park would also have an adverse impact on the district centre given it currently provides 3 hours free parking and therefore provides the opportunity for customers to both shop in the store as well as visit the rest of the centre.
- 7.49. Moreover, the loss of a full-sized store would result in a loss of local employment for some 230 people. Protecting and enhancing employment opportunities is supported by local policy; the loss of employment is not.
- 7.50. The store also provides a well-used, albeit somewhat limited, online service which Sainsbury's want to improve. The loss of the online service at this store will increase pressure on other, more distant stores, to fulfil the demand. This will result in longer delivery distances and an overall reduction in the capacity to fulfil online orders to the detriment of

the surrounding traffic and transport network and air quality environment.

- 7.51. Finally, the survey results confirm an established link between the Sainsbury's store and the District Centre. The on-street centre survey indicates that linked trips could account for over 50% of the trips to the District Centre. The loss of linked trips will reduce footfall in the District Centre which will impact on the vitality and overall performance of the centre.
- 7.52. In addition, if the store is relocated closer to the front of the site, the District Centre is anticipated to experience a considerable uplift in linked trip expenditure and local residents would benefit from an improved, more modern Sainsbury's store which is more closely aligned with current shopping expectations. Therefore, the loss of the Sainsbury's store would also be a lost opportunity to strengthen the health of the District Centre.
- 7.53. At present, Sainsbury's and the Retail Park's car parks provide a car park for the centre. The loss of the associated car parking as a result of the redevelopment for the BLE will further damage the attractiveness and accessibility of the centre.
- 7.54. In conclusion, our analysis has demonstrated that the loss of the existing Sainsbury's store and the New Cross Gate Retail Park will result in significantly adverse quantitative and qualitative impacts on the New Cross/New Cross Gate District Centre. The loss of the store entirely or its replacement with a Local format store would result in the material worsening in access to basic, main food grocery needs for local residents; a loss of local employment for a substantial number of people; and a clear significant adverse impact on the health of the District Centre. Alternatively, the proposed replacement store provides the opportunity to: update the existing Sainsbury's store; expand and transform its comparison goods offer and its capacity to meet online needs; and relocate it to the front of the site which will reinforce links to the rest of the District Centre
- 7.55. The redevelopment of the site will result in a more intensive use of the site to include quality residential development in a highly accessible location. It not only safeguards existing employment, but will expand employment opportunities, as well as retaining the car parking provision that supports the store and the adjoining District Centre.

## 8. Conclusions

- 8.1. Sainsbury's and its development partner are proposing the redevelopment of the site at New Cross Gate for a mixed-use scheme incorporating a relocated and expanded Sainsbury's store (moved nearer to the New Cross Road frontage) with high-density residential development above and across the rest of the site.
- 8.2. There is clear acknowledgement and support within the local planning framework for future proposals at the site to include a Sainsbury's store. The adopted Site Allocations Local Plan 2013 identifies the Sainsbury's site as an important town centre site and allocates it for mixed use redevelopment (including Sainsbury's) which will contribute to improve the vitality and viability of the District Centre and provide a stronger active frontage. The proposals accord with the local policy aspirations for the site.
- 8.3. Furthermore, the Council's Retail Study recognises that the Sainsbury's store is an anchor for the District Centre and that there is a 'steady stream' of people travelling between the two elements. Our surveys reinforce these conclusions.
- 8.4. Ordinarily, it would not be necessary to test the impact of new retail development within an allocated centre. However, despite the clear policy position relevant to this site, we address three retail impact scenarios as follows:
1. The complete closure of all retailing at the site, including the loss of the Sainsbury's store and New Cross Gate Retail Park;
  2. The replacement of the existing retail with a small format Sainsbury's Local store; or
  3. The development proposed by Sainsbury's which includes a replacement store closer to the New Cross Road frontage and new residential development.
- 8.5. Our findings have been informed by extensive and up-to-date survey work which includes a new household telephone survey; an exit survey at both the Sainsbury's store and New Cross Retail Park; and an on-street survey within New Cross/New Cross Gate District Centre undertaken in January and February 2019.
- 8.6. Our impact assessment shows that the scenarios which include the complete closure of the Sainsbury's store and New Cross Gate Retail Park, without any replacement facilities, or its replacement with a small format Sainsbury's Local store would result in a significant adverse impact on the District Centre in the order of -69% to -73%.
- 8.7. However, the impact of the loss of the Sainsbury's store will be more than the loss of turnover. The loss of Sainsbury's and the Retail Park will result in the loss of some 230 local jobs as well as the car parking provision which supports the adjoining District Centre. It is likely to materially reduce the number of visitors to the District Centre as our survey evidence confirms that a significant number of visitors to these facilities link their trip with a visit to the District Centre. This is unsurprising given the Sainsbury's store anchors the District Centre. These impacts have implications for the health, vitality and viability of the District Centre which will be inevitably weakened.
- 8.8. The loss of the Sainsbury's store will have further implications for those residents who rely on alternative means of transport to access grocery needs. A small format store cannot fulfil main food shopping needs and the loss of this popular store will reduce accessibility for those residents to basic convenience needs. Also, the loss of the already under pressure GOL service will result in increased sustainability impacts as Sainsbury's look to stores

further afield to meet consumer online shopping needs around the existing store.

- 8.9. The alternative, however, is the proposed redevelopment of the Sainsbury's store and the New Cross Gate Retail Park to provide a state-of-the-art replacement Sainsbury's store and new residential development in this highly accessible location. The result will be a positive impact (+14.9%) on the District Centre, particularly as the new Sainsbury's store will include an improved and expanded comparison goods offer which will help to mitigate the impact of the loss of the New Cross Gate Retail Park, and a material improvement to the shopping environment as well as store efficiency and operation. Also, the store will be far more appropriately located to support and generate linked trips to the District Centre and it will further improve accessibility for people who rely on alternative means of transport such as public transport or walking/cycling.
- 8.10. In short, it will secure and enhance employment opportunities; ensure that Sainsbury's can continue to meet consumer needs for the foreseeable future; and underpin the ongoing health, vitality and viability of the District Centre as anticipated by the local policy framework.
- 8.11. In the context of the widely-reported 'high street crisis' and the closure of unprecedented numbers of shops; the substantial loss of employment within the retail industry; worsening vacancy rates and the commercial instability of some of the highest profile and longest-serving retailers on the high street; the benefits of the proposal should be affirmed. Despite the challenges facing Britain's high streets and town centres, Sainsbury's, together with their development partner, are committing to significant investment which will deliver high-quality, modern development; regeneration to an under-utilised (and policy compliant) site; and safeguard the vitality of the wider District Centre, as well as future-proofing the ongoing provision of important and essential grocery needs of the local community for the foreseeable future.
- 8.12. Underpinning the NPPF is the Government expectation to deliver strong, responsive and competitive economies; and strong, vibrant and healthy communities whilst minimising the impact on the natural (and other) environments. The proposed development will deliver these aspirations on an appropriately located site in a highly-urbanised and accessible location. In short, there are compelling planning grounds for its favourable determination.





Sainsbury's

Selly Oak



21 November 2018

# Delivering Destination Sainsbury's

To successfully deliver Destination Sainsbury's, our focus is on developing existing and new missions, while step changing our store environments to make them more exciting and engaging for our customers. We believe this will deliver a leading and unique proposition for our customers.

Selly Oak represents a step on that journey, creating a store which really harnesses the power of the Group and select partner brands, whilst ensuring we have a robust operating and service model to provide our colleagues with the platform they need to give customers WOW service.

We have future plans to introduce these propositions across our estate in a targeted way, picking the right component parts relevant to individual stores based on key demographic characteristics and customer requirements.

What we have delivered in Selly Oak makes us really excited for the future.



# Background

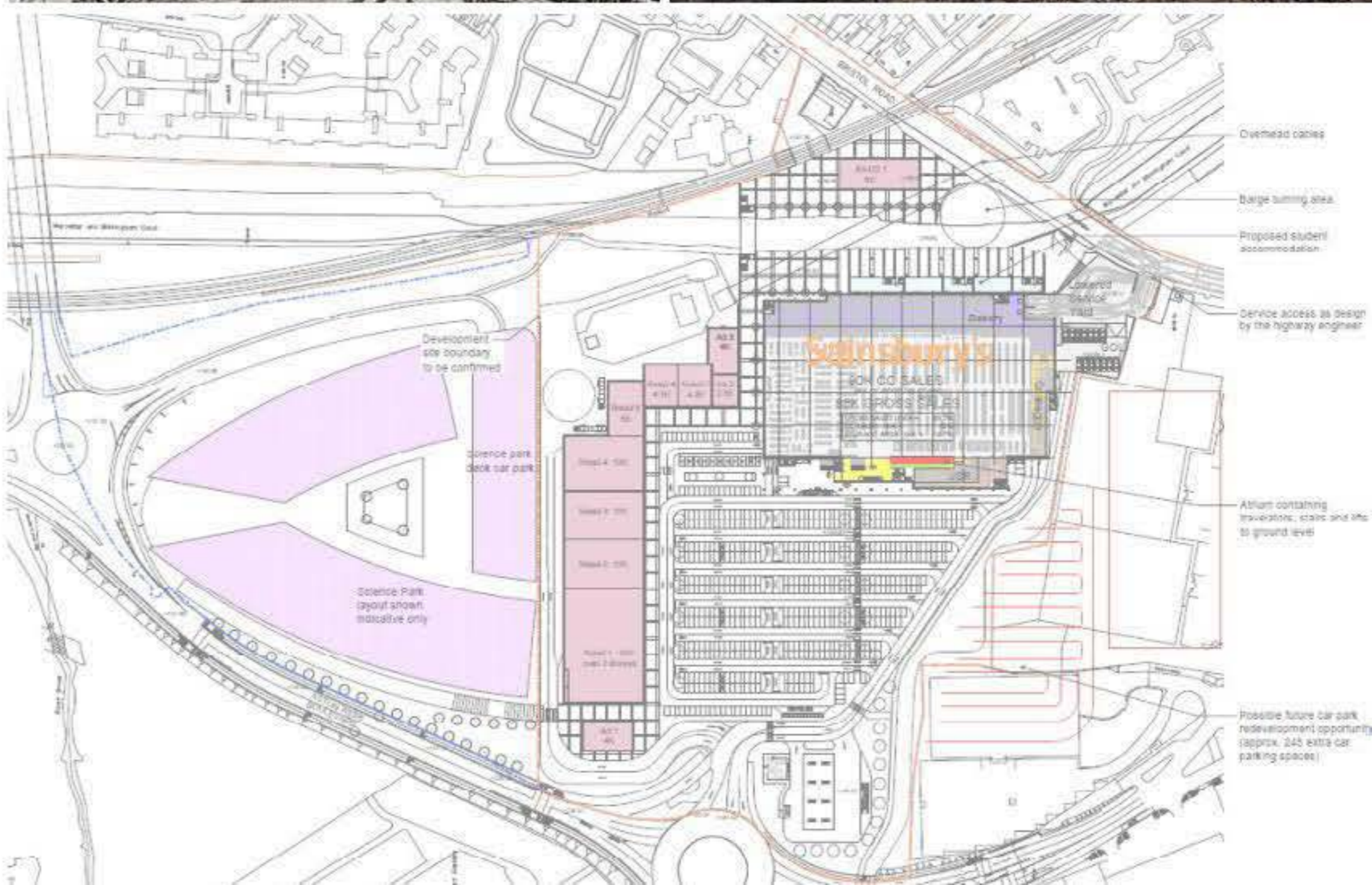
**'Regenerating Selly Oak' is a project to develop the industrial and residential area, delivered by the Harvest Partnership (a joint venture between Sainsbury's and Land Securities) and Birmingham City Council.**

The former Battery Park site at Selly Oak in Greater Birmingham has played a key role in the regeneration and economic growth of the Region. Birmingham Battery & Metal Company, which was founded in the first half of the 19th Century and moved here in the 1870s. Later known as the Birmingham Battery Company, the firm manufactured brass pans at the site, ranging from a few inches to several feet in diameter.

The site also featured a copper refinery, a tube mill, a rolling mill and a canal wharf on the Dudley Canal, also known locally as the Lapal Canal. In the decades to follow, part of the site became an area for landfill, which was later covered with a layer of clay. Due to this, and the industrial history of the site, a huge amount of ash, coal tar and other contaminated materials remained buried underground. In order to make the site ready for construction, Contractors PJ Carey have combined advanced planning and an innovative remediation strategy to re-profiling the 12-hectare Battery site landscape.

The entire site has been transformed into a hub of retail, employment, leisure and student accommodation, including a more sustainable replacement Sainsbury's foodstore along with a number of shops, restaurants, cafés, bars and services, creating up to 2,700 jobs.

Relocating from the Selly Oak Chapel Lane site and doubling the existing from 61ksqft. The new development comprises of a 130ksqft supermarket, with a multi offer Food Market and 180 seating capacity, as well as Food to Go and Sushi Gourmet counters. The store includes a new home department with an Argos and Habitat store in store. As well as a new Tu clothing department and Oasis store in store. There is a dedicated undercroft car park with 596 spaces. The site includes a 16 pump petrol station with the first 24 hour operated kiosk and a self-serve Coffee to Go offer.



# Project overview

## Sales Forecast

JS Mature Sales Forecast - £983k/wk

JS Year 1 Sales Forecast - £909k/wk (92.5% of mature sales)

JS Forecast Basket Size - £26

## Sales Forecast

Total sales area with checkouts - 71,475 SQFT

Total GM sales area - 26,594 SQFT

Total colleagues - 353

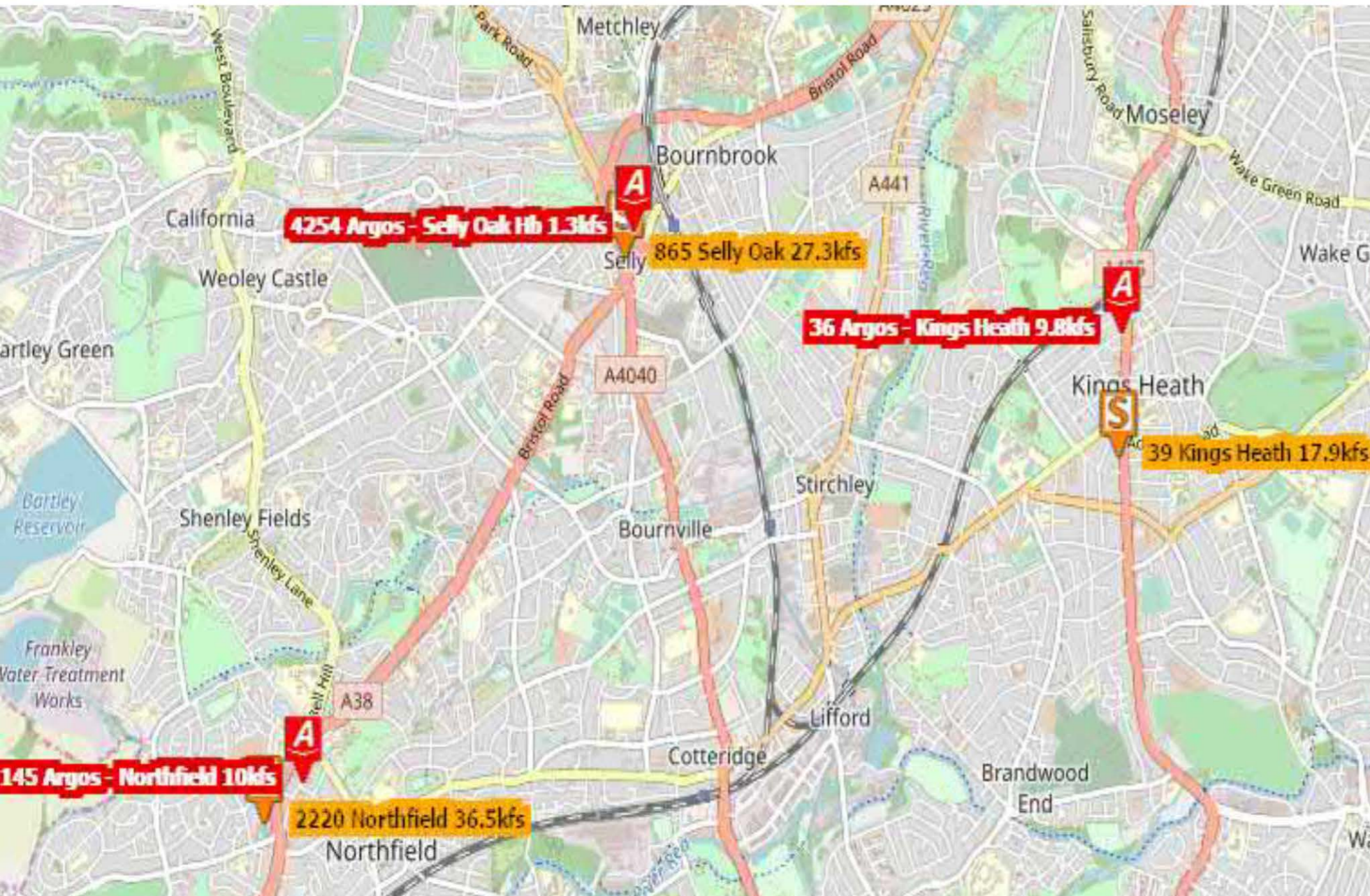
Total car park spaces - 596

Parent & child parking - 22

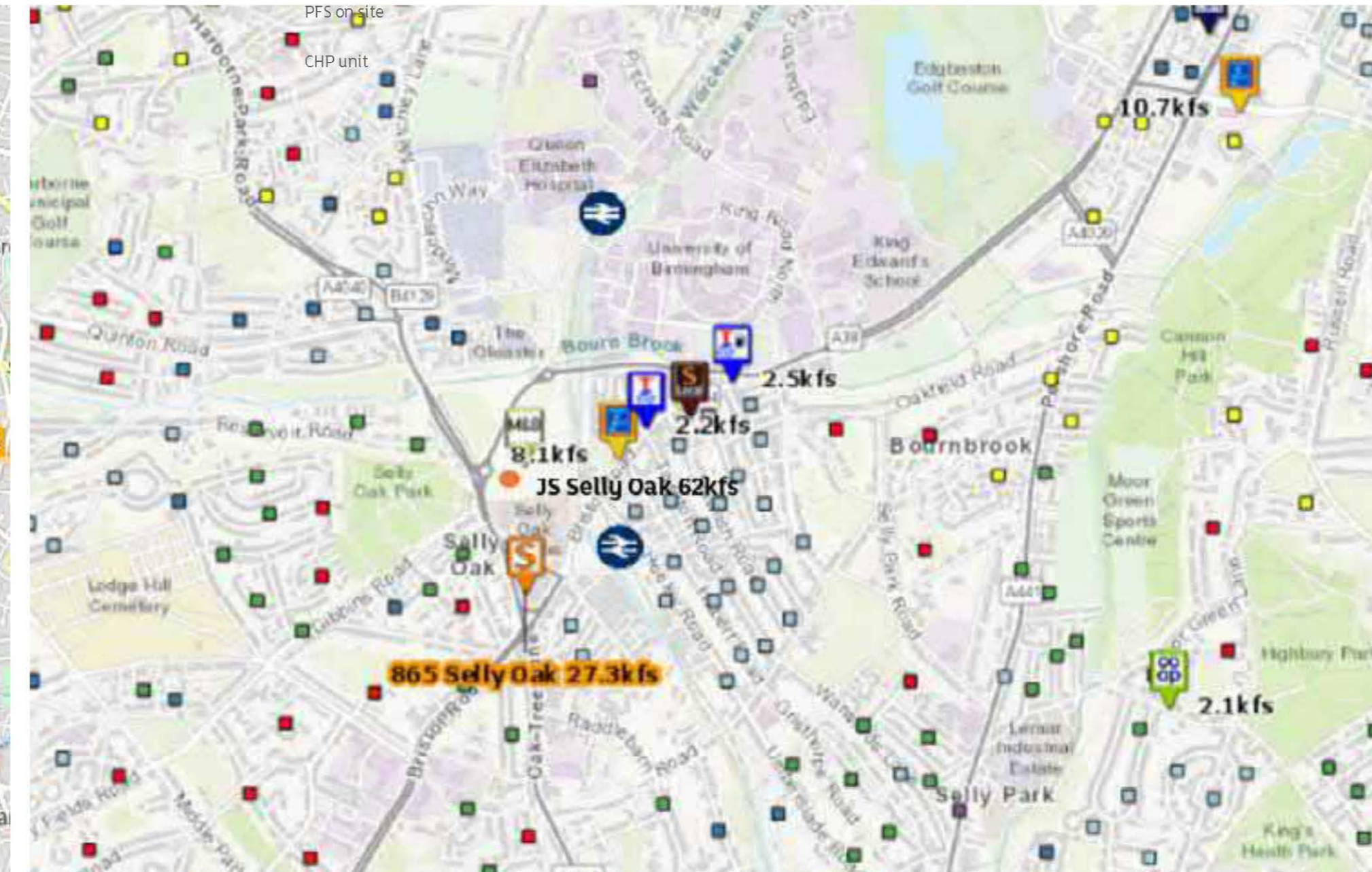
GOL operation

Total new colleagues - 180

Disabled parking - 33



## Location



## Competition

## Key numbers

- In June 2014, Sainsbury's and its development partners commenced with one of the most intensive brownfield clean-up operations in the UK.
- June 2016, the remediation works are complete and the site is ready to be regenerated. Construction work commenced to deliver a new Sainsbury's supermarket, additional retail outlets, places to eat and drink, new student accommodation and an entire campus for Life Sciences.
- 13 week store fit out programme completed by Sainsbury's and Contractors. 4-5 week delays within some areas has not impacted the delivery of the programme.

## Key site facts

- Joint venture with Harvest (Development company jointly owned by SSL and Land Securities)
- Site was re-mediated by Ramheath (SSL company)
- On PC of the re-mediation works approximately half the site was sold off to Birmingham City Council for future use as Life Sciences Park
- Site includes an 18 Storey Student Accommodation Block and 11 Retail Units
- Retail park has now been sold to M&G with CBRE as the managing agent
- S278 works to complete once new supermarket opens at the site of the current trading store
- Provision made on site for a future canal to run through the site (will be left as a "Greenway" linking Bristol Road to Selly Park
- Second site known as "Goodmans Yard" is in process of being developed to provide linkages and a bridge to the town centre (July 2019)

## Milestone Dates

<b>August 2016</b> Handover remediated site to Harvest	<b>September 2016</b> Main contractor tenders issued	<b>July 2017</b> Interserve appointed as Shell contractor	<b>August 2017</b> Work start on site	<b>August 2018</b> Basebuild commence fit out for 13 weeks	<b>September 2018</b> Retail units completed	<b>November 2017</b> Sainsbury's open	<b>July 2018</b> Student accommodation completed
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# Construction

**June 2014** Work on-site commenced

**13** Week store fit-out program

**50,000** tonnes of aggregate removed

**35,000** man hours for remediation work

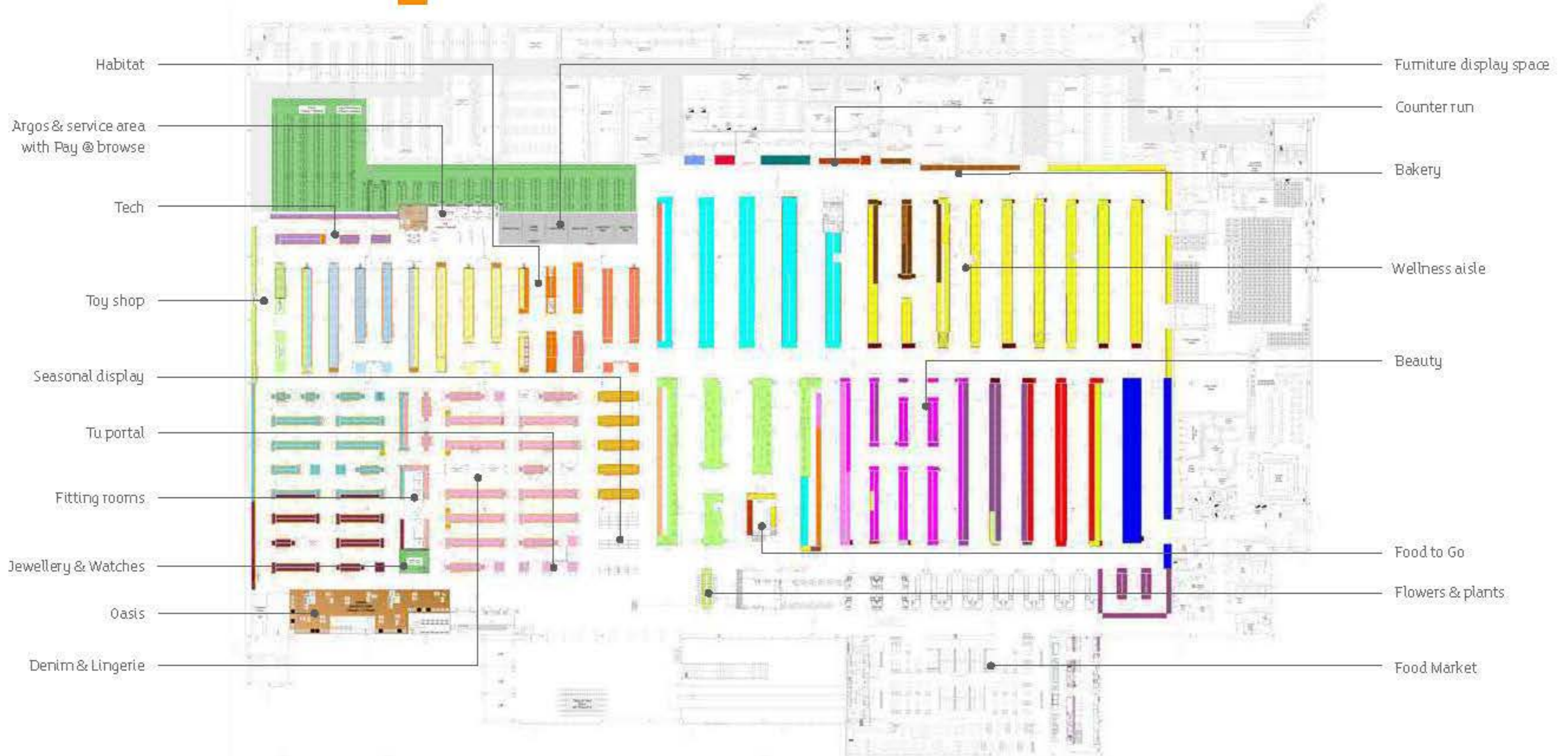
**375** 'Unique' items discovered



# Exterior photos



# Store plan





# Value added food

It is critical that we continue to put food at the heart of our customer offer, celebrate our distinctiveness and use our Fresh offer to create a greater emotional engagement with our shoppers and with our brand. Delivering a compelling Food Service proposition across our stores is a key part of that.

Across Food Service our vision is to deliver:

- An inspiring range & environment that creates a complete sensory experience for our customers
- A fresh and distinct food proposition to ultimately create more motivation for our customers to visit
- Personal and experiential food for now, always with theatre
- Whenever and wherever customers want

In Selly Oak, we have taken material steps towards delivering on our vision to bring this to life for our customers and colleagues. We will use this as a springboard to drive this work back into our wider estate.



Food for Later Destination:  
Counter run championing freshness, providing inspiration and celebrating our Sainsbury's Select offer



Food to Go Hub:  
A focal point in-store to drive the 'on the go' mission championing freshness and convenience



Open-plan bakery celebrating our scratch baking offer



Our first Food Market creating a destination for customers to eat-in and dwell



Appealing and inspiring 'Flower Shop'

# FOOD MARKET

## Food Market

Our first ever Food Market brings a real energy and excitement to the store. It creates a destination for customers to eat-in and dwell, and has been designed to cater for a variety of occasions, whether that is over a coffee and chat with friends, to plug in and do some work or to enjoy a casual dinner with family. This offers a significant opportunity for Sainsbury's in a space where we have low customer participation.

The menus are designed to champion freshness and the choice is varied, ranging from classic British food from our own Fresh Kitchen, highlighting the best of J Sainsbury's products, to specially developed offers from our implant partners Wok Street (South East Asian cuisine), and Little India Kitchen (Indian street food). There is also a salad bar, a coffee bar, and a range of desserts including a range of Patisserie Valerie cakes and a Taste the Difference ice-cream counter.

This fantastic customer offer, delivered over extended opening hours, and with our first ever alcohol license, will help to drive use throughout the day and create a destination fit for more occasions.

Fresh Kitchen

Coffee Bar

# Food Market





## Food to go hub

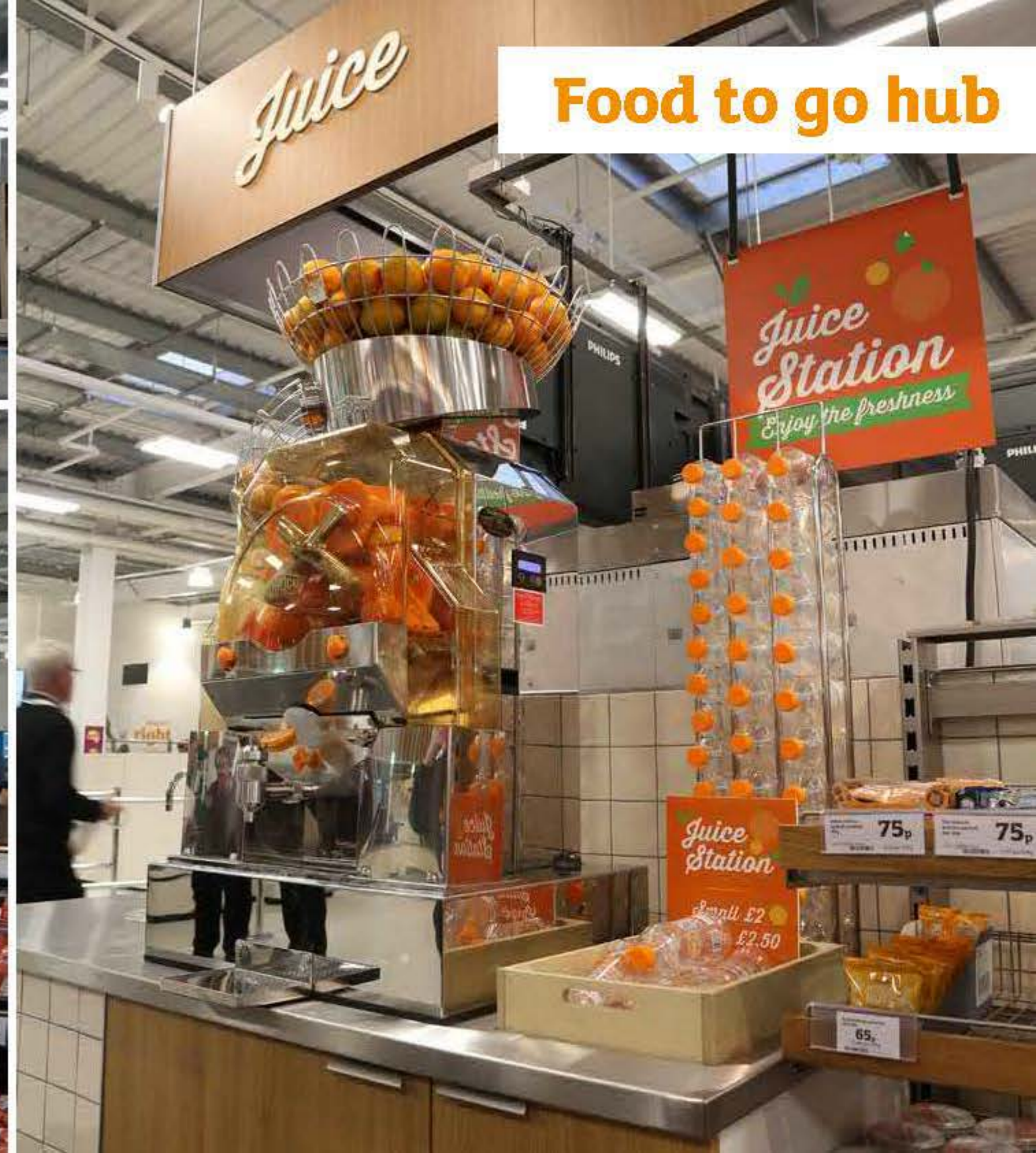
Building on the success of the Food To Go 'store-in-store' we delivered at the front of our Pimlico store last year, we've created a one-stop destination for Food To Go at the front of Selly Oak – the Food To Go Hub - as a focal point to drive the mission championing freshness and speed / convenience.

*Hot drinks*  
We've brought together the best of our hot and cold food to go offers in one place and added some new offers, so customers can get what they need from the hub for their 'On the go' breakfast, lunch and dinner, as well as for a quick snack!

Customers can help themselves to pastries baked in store, alongside new offers of freshly ground coffee and freshly squeezed juice for breakfast. For lunch, we've also introduced freshly made baguettes alongside our chilled sandwiches, salads, snacks and hot food, and put our fast-cook pizza oven in the heart of the Hub to cook pizzas to order for customers in 2-3 minutes.

With an eye on sustainability, we've also added a refillable water station with reusable bottles on sale, and will also offer reusable coffee cups for sale.

By bringing the on the go mission together, and locating it near to the self-service checkout we're making it really quick and easy for customers on the go.



**Food to go hub**

# Counters

In the counter run, we are on the journey towards creating a Food For Later / Food For Tonight destination.

Alongside our latest Fish, Meat and Deli counters we have:

- A Sushi Gourmet implant
- Space dedicated to celebrating our fantastic Sainsbury's Select Customer Ordering range,
- Created our first 'Meals for Later' counter focused delivering inspiring food for tonight, an area where we have exciting product development planned for the future.



Meat Quality



Cheese The Deli Antipasti



Meals for Later Hot Chicken





## Bakery & Patisserie

In Bakery we are really celebrating the work our bakers do every day to get the credit we deserve for our fantastic range.

We have done this by:

- Opening vision into the production area allowing customers to see how their bread is baked in store daily
- Offering sampling to engage and entice customers
- For the first time there is a 'Naked' bread display to champion our new range of premium artisan bread baked from scratch in store

# Floral & produce

We want to create a best-in-class destination more akin to a Flower Shop that is more engaging for customers encouraging more dwell and consideration.

We have redesigned the equipment to:

- Accommodate a wider range
- Offer flexibility to adjust for seasonal space requirements
- Be visually more appealing and inspiring for customers

This execution has been developed alongside a 1-2 bay solution for Floral in Convenience which is being rolled out to 300 stores this financial year.

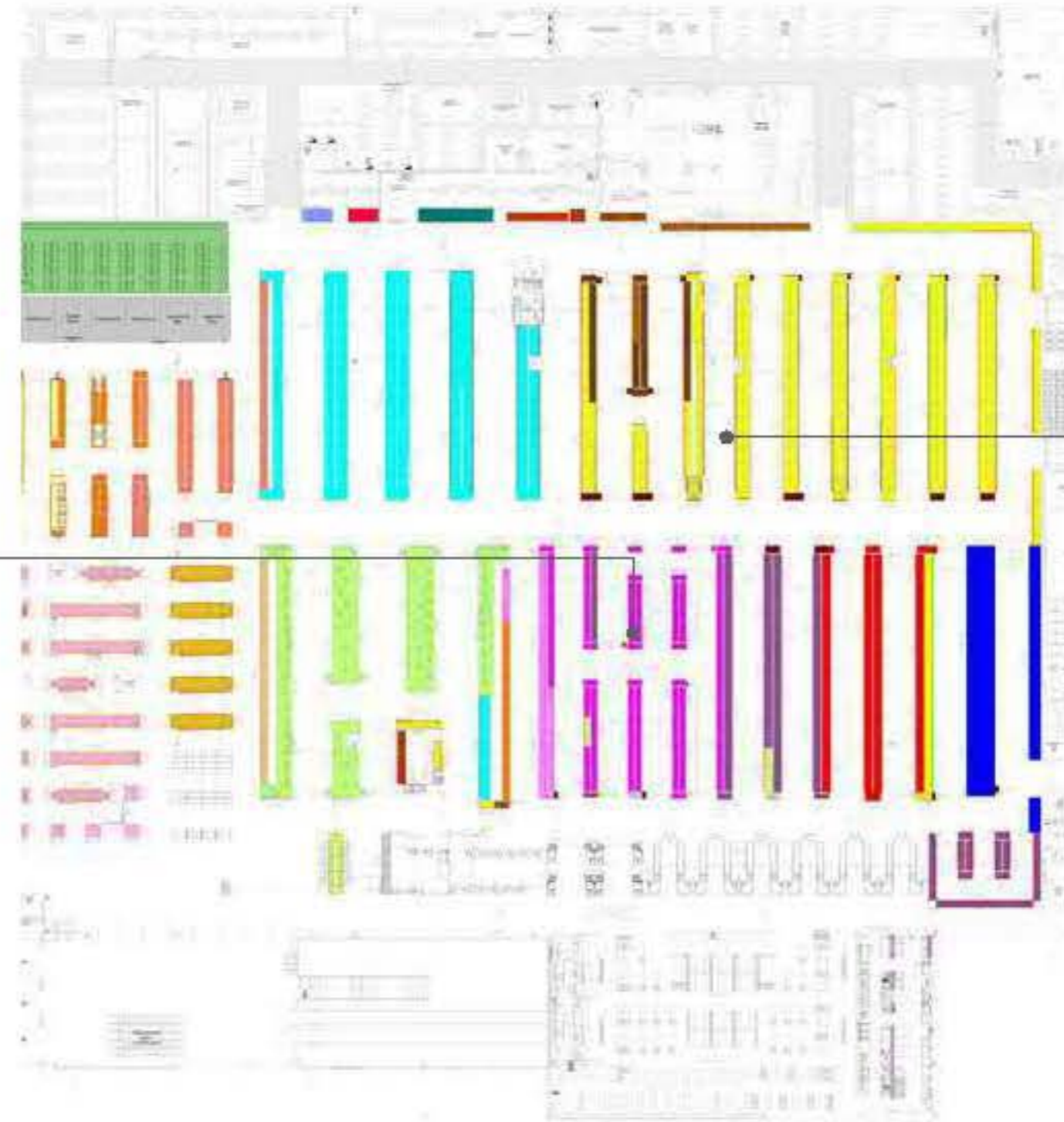




# Big bets



The latest iteration of our brand new Beauty category



Our first Wellness category bringing together a selection of healthy food, snacks and vitamins

# Beauty

## Ambition

We want to grow our position as a leading supermarket and compete with the specialist retailers.

To do this we will significantly grow our cosmetics, personal care, skincare, gifting and fragrance ranges. They need to be at the heart of the department in an environment which has more of a specialist store feel.

## Opportunity

The beauty and personal care market in the UK is worth £10.1bn, forecast to rise 9.5% to £11.1bn by 2022. Beauty has consistently driven the market growth over the last 7 years.

For this kind of product, bricks and mortar shops remain the most common place to purchase. However, in order to defend our position versus the online retailers, the environment we create in store and the service we offer will become increasingly important.

## Proposition

New tile system cosmetic units, which showcase products and hero the brands – providing an easier to shop and browse area. Provide theatre and newness from the main aisle to create interest and change of pace. New fixture treatment for skincare, premiumised personal care, fragrance and gifting to create a distinctively different environment to the food hall.

Brands now ranged to serve wider customer missions, for example, Barry M and Collection in Cosmetics, and more premium Skincare brands such as Kiss the Moon and a wider range of Super Facialist. The "Beauty Expert" will maintain the department and take ownership of the service delivered in this area.

Each colleague completes our online training academy and in some cases has undertaken some training with L'Oréal themselves. This training sets the colleague up to deliver on their "Beauty Expert" title, making them feel comfortable advising on our exciting brands and looking after their beautiful new equipment.





Beauty

8 Fragrance Skincare

RIMMEL LONDON

RIMMEL LONDON

MAYBELLINE

MAYBELLINE

Facial skincare

Natural skincare

Natural skincare

GIVE YOUR SKIN A TREAT

SKINCARE MUST-HAVES



# Wellness

## Ambition

Allocate more space to Wellness, expanding product ranges, and offering a more aspirational environment for Wellness customers.

By gaining 3% market share in the component Wellness categories in focus, Sainsbury's could capture a sales opportunity worth £80m.

## Opportunity

- 10% of our customers shop at Holland & Barrett
- The combined UK Wellness market is worth over £2.5bn
- We have clear range gaps which we can address
- Our product information and navigation is currently limited

## Proposition

A standalone Wellness proposition with an 'aspirational' feel to serve new health and lifestyle missions and drive incremental sales from current and new customers.

Introduced into an aisle within Grocery within the area that health foods is currently located, or adjacent ranges are near to.

New equipment to create a stand out feature in store and give us credibility in the Wellness space. Up weighted comms to provide customers with key product information, as well as exciting and enticing customers to try something new.

There are c.1000 SKUs, half of which are new. We have relocated vitamins and supplements, sports nutrition to create a destination area, while dual locating products which have a split mission e.g. nuts and grains still remain within home baking.

# Wellness



# Grocery



## BWS

We have continued to roll forward our successful new BWS 'warehouse' environment landed in Pimlico. This brings more interest and dwell time to the category.

Outside Selly Oak we have a programme of trials and roll-backs to get this into more of our estate.



Argos & service area with Pay @ browse



Habitat



Furniture display space



Finance hub



Entertainment & tech



Toy shop



Fitting rooms



Oasis



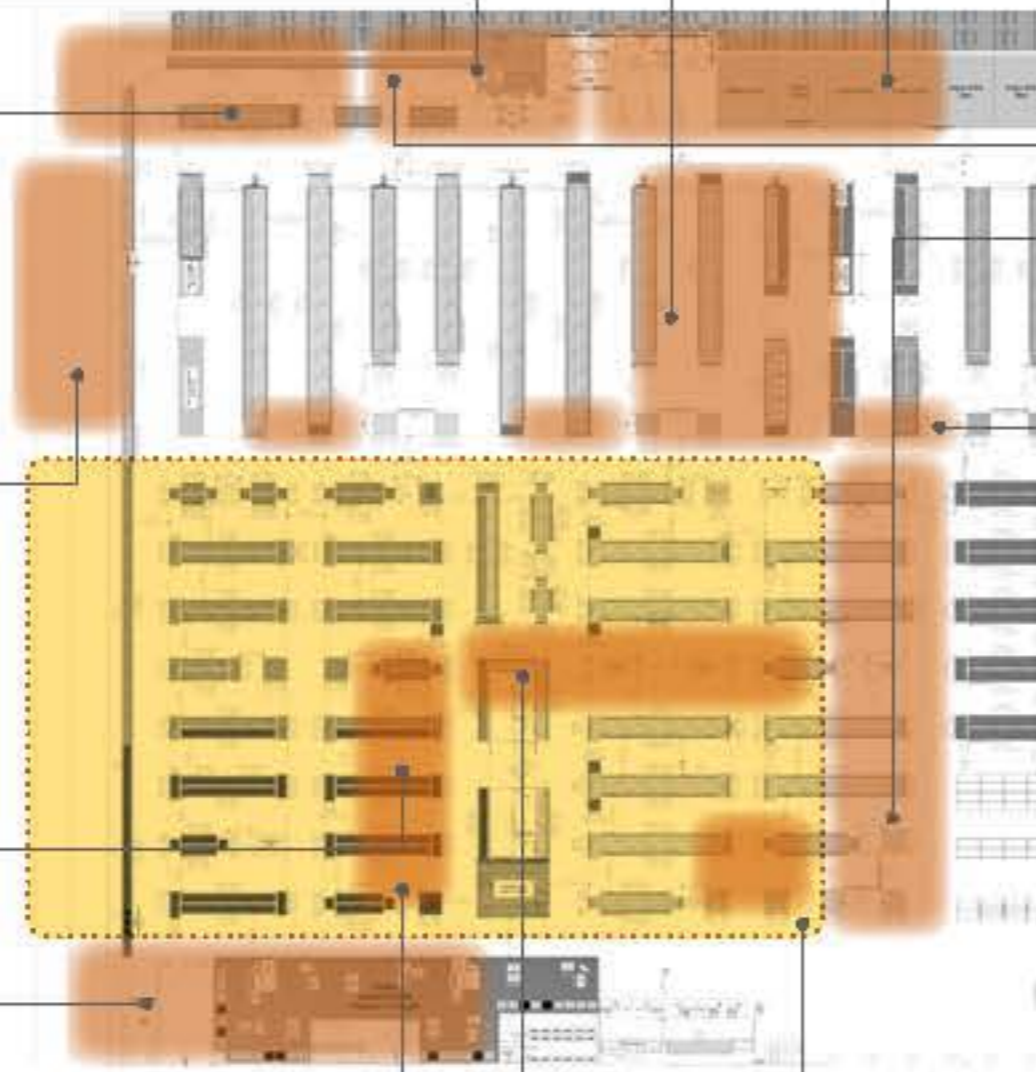
Jewellery & Watches



Lingerie



Tu portal



Seasonal display



Portals

# Integrated GM & Clothing

We want our customers to experience a seamless blend between the Argos store in store and the Sainsbury's general merchandise shop floor. We have linked the category missions by encouraging customers to shop the physical ranges with engaging displays and then highlighting extended ranges accessed through Argos digital browsers in each department, where customers can search for more products, pay, and pick up from the Argos collection point.

Clothing & Seasonal have been located at the front of the mat providing key positions for two areas which continually change through the seasons.

This enables General Merchandise to flow off the Argos store in store with key service enabled categories - Tech, Furniture and Habitat within sight-lines of colleagues who can provide dedicated advice and help customer with their purchase.

# Seasonal

## Ambition

At the front of the Non Food mat we want a highly visible area which creates theatre and showcases seasonal products across our three group brands, for example; Christmas Trees from Sainsbury's and Argos, accessorised with bright and colourful decorations.

## Proposition

A complete seasonally themed area, which also works in conjunction with the food seasonal offers - a blend of visually merchandised displays and products to pick up.

The area will change in line with seasonal events, including The January Sale, and Summer Living - where we will showcase products BBQs, Garden Furniture and accessories.

Part of the equipment is mobile and flexible so it can be moved and re-merchandised depending on the season and mix of products seasonal cycle.







# Tu

## Ambition

Our strategy for Tu is to continually grow awareness and establish it as a standalone fashion brand.

A big part of this is to highlight our breath of ranges, strengths of key categories and update the in-store environment experience through improved look & feel and layout.

## Proposition

The layout and flow has been updated to support a more 'shop' type environment to enable products to be more segmented into specific zones.

The area maintains the flexibility in range movement with use of medium height fixtures allow for a more open feel.

At the heart of the department we have introduced new look fitting rooms.

Key departments and features like lingerie and denim have been given a face lift to feel more relevant to the product type, with new fixtures and vibrant, fresh, merchandising displays to highlight the latest in season looks.

The Tu corner portal feature acts as our shop window, and certainly doesn't lack impact!

# Jewellery & Watches

## Ambition

Argos is a leading retailer of jewellery and watches under £200 and the majority of transactions take place in the physical space. But the presence of the category is reduced in store in stores. We need to maintain our market position.

## Proposition

We have development a standalone counter offer, located adjacent to the fitting rooms and in the centre of our clothing area - linking the fashion related ranges.

The counter will be manned by a colleague, providing customers with advice and great fulfilment from the store in store.

Jewellery & Watches

JEWELLERY & WATCHES



# Fitting Rooms

Being able to try clothes on before purchasing is key to our customers, and being able to do so in a comfortable environment is important.

Located at the heart of our clothing area, you'll find our new attractive fitting rooms, which serves our whole clothing area - Tu and Oasis.

We believe it will encourage a wider range of customers to try ranges as a result, increases sales and reducing returns.

We have a standalone Argos Jewellery & Watches shop to cement our position as a leading retailer of products under £200.



# Oasis

Selly Oak is one of six Oasis store in stores we are launching. This partner brand aligns with the strategy to create a destination fashion department.

As part of the integration journey the environment is open, with minimal walls to create a seamless link with Tu and encourage footfall.



# Home & furniture

## Ambition

Provide inspiration for your living room, dining room, bedroom and kitchen, bringing together all our group brands to showcase our breath of furniture and home accessories.

## Proposition

Located next to the Argos store in store and adjacent to our Home department - this area is a showroom for our home and furniture products.

With furniture from Argos and Habitat, fulfilled via the Argos order point, accessorised with Sainsbury's and Habitat home-wares - which customers can pick up and purchase through the Sainsbury's tills.

The space will be refreshed and change throughout cycles in the year.



# Home & furniture





# Habitat

## Ambition

As part of the integration journey, we want to explore ways in which we can introduce our fantastic Habitat group brand into the Home area - enabling a more scalable proposition and link the home missions.

## Proposition

An integrated but defined Habitat home & furnishings space within the Home footprint and linked to the Home & furniture showroom where Habitat furniture and accessories are on display.

Key ranges and products from the store in store proposition included.

Utilisation of existing fixture structure, but with a Habitat look & feel applied.

Products on fixtures will be transactional via the JS till.

Habitat furniture products will be fulfilled via the service / FS HUB area.

# Argos

## Finance and service hub pay @ browse

### Ambition

We want to create a seamless blend between the Argos order and collection area and the general merchandising space, so we can link the category missions of the products physically on display, while highlighting the extended ranges.

### Proposition

The customer area has been developed into a much more open space, clearly linked to the general merchandise categories which sit in front.

To the left of the order and collection point is a new financial services HUB. The area will facilitate our range of group finance and service options and act as a destination for customer advice, including an order point for Habitat extended ranges.

Pay @ browsers are included in-front of the service area and now stretch out onto some the end fixtures facing into the Argos - providing that clear link to extended ranging which enable payment.

Non-transaction browsers included in the department lead in portals to introduce extended ranging early in the journey.







# Tech

## Ambition

Highlight our breath of range in the tech category by providing an interactive area for customers to touch, test and play with the products.

## Proposition

An area adjacent to the entertainment department and Argos store in store with tables to display a number of smart home and smart speaker products.

A 2 bay display of televisions, sound bars and console products included with a clear signpost to range within the Argos. This area enables customers to really engage with the products to test and try out their features and functions.





# Toys

## Ambition

An exciting and interactive area to bring children and parents alike into the toy department – and here the key market and group brands.

## Proposition

An area to hero three brands (Hasbro, Mattel and Lego) complete with interactive branded bays. We've given an area of physical space to Chad Valley providing a gateway into Argos to over a further 1,000 lines.

All lines within toys can be purchased through the Sainsbury's checkouts.

A browser has been added into the area to enable customers to browse extended ranges.

We have added a 'pop up' area for events which can be flexed throughout the year, either for interactive brand led events or volume product during Toy Spike events.

# Toys



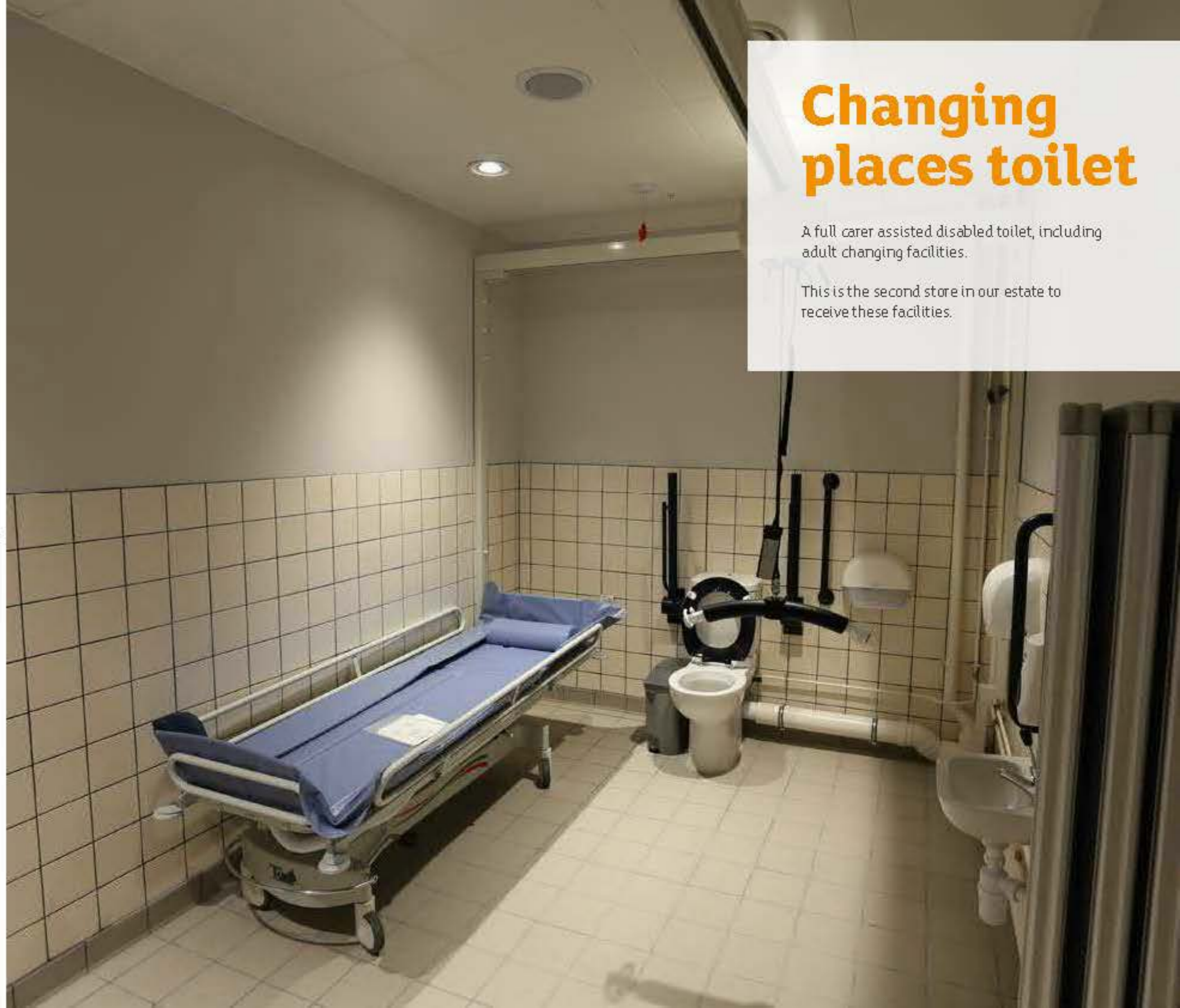




## Changing places toilet

A full carer assisted disabled toilet, including adult changing facilities.

This is the second store in our estate to receive these facilities.



# General comms



PFS



Self-serve coffee



# Colleague area

Significantly reduced colleague areas to encourage more colleagues to spend more time on the sales floor supporting delivery of WOW service.

Charging facilities provided in colleague areas.

Oak







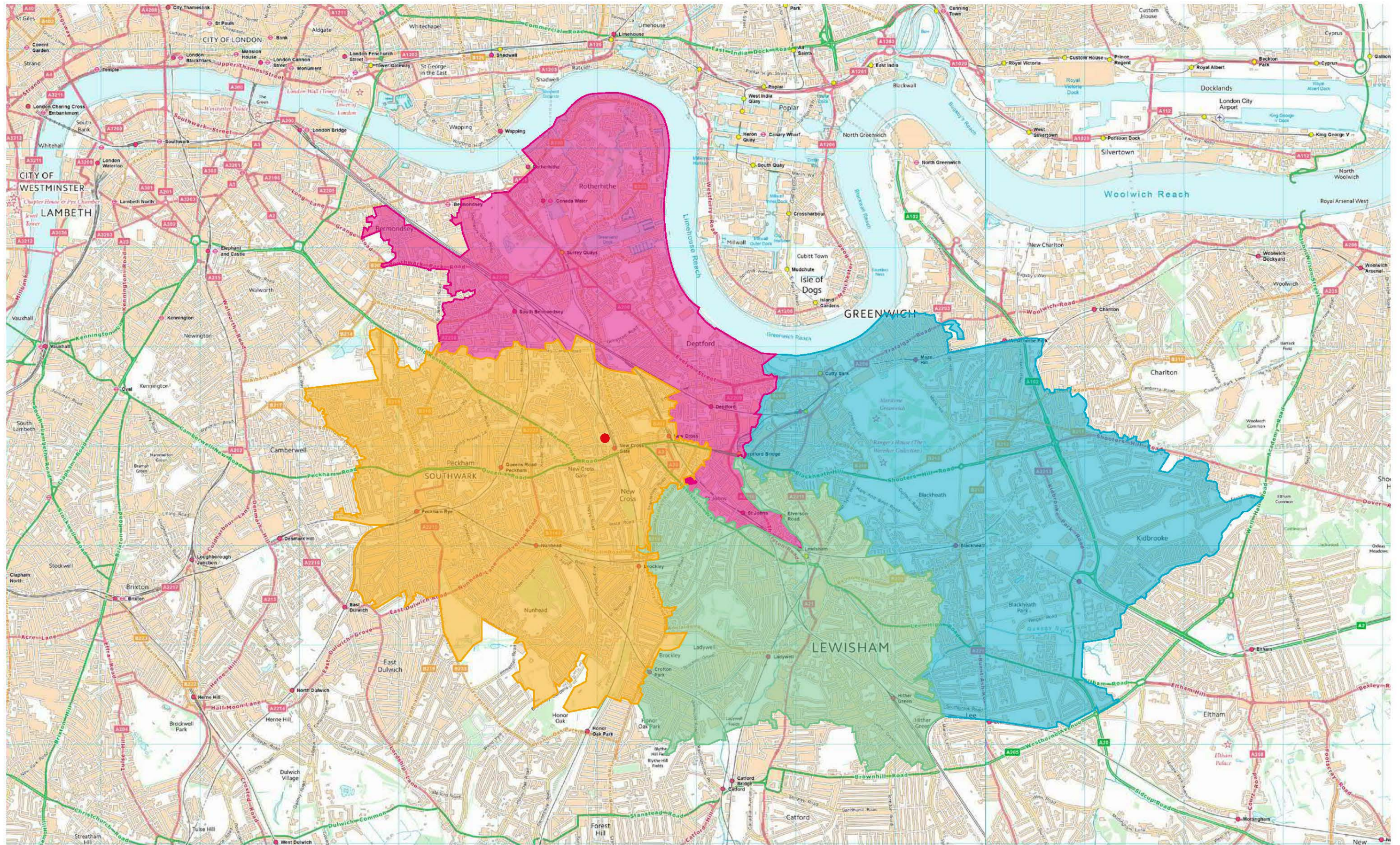
**I'm really proud to continue with Sainsbury's in our community of Selly Oak, where we've been established for over 32 years.**

**We can now offer customers a fantastic, extended product range such as Argos, Habitat and our new Food Market with Wok Street and Little India Kitchen.**

**Tom Balay – Store Manager**

**#winningtogether**





Key ● Site location

- Study area zone 1
- Study area zone 2
- Study area zone 3
- Study area zone 4

**Project** Sainsbury's New Cross Gate  
**Title** Location plan  
**Client** Sainsbury's Property Investments

**LPA** London Borough of Lewisham

**Date:** 21.03.19  
**Scale:** NTS  
**Project No:** 16140007  
**Drawing No:** 16140007/1  
**Drawn By:** MKR



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**indigo.**



Sainsburys, New Cross Gate

Table 1: Estimated Study Area Population and Convenience Goods Expenditure

	Zone 1	Zone 2	Zone 3	Zone 4	Total
<b>2017</b>					
Population	79,631	110,290	64,547	67,343	<b>321,811</b>
Expenditure Per Head (£)	1,860	1,809	2,086	2,294	
Total Expenditure (£m)	148.11	199.51	134.65	154.48	<b>636.76</b>
<b>2019</b>					
Population	82,762	114,761	67,935	70,151	<b>335,609</b>
Expenditure Per Head (£)	1,888	1,836	2,117	2,328	
Total Expenditure (£m)	156.25	210.72	143.84	163.34	<b>674.16</b>
<b>2024</b>					
Population	88,438	121,454	72,612	74,732	<b>357,236</b>
Expenditure Per Head (£)	1,907	1,855	2,139	2,352	
Total Expenditure (£m)	168.64	225.25	155.29	175.76	<b>724.94</b>
<b>Expenditure Growth:</b>					
2019-2024 (£m)	12.39	14.53	11.45	12.41	<b>50.78</b>

Notes

1. Population and projections derived from Experian based on study area zones. Experian do not make allowance for new housing provision.
2. 2017 convenience prices derived from Experian Retail Planner Expenditure Reports.
3. Growth rate of 1.3% for 2017 and 0.2% for 2018 - 2024 (Figure 2 of Experian RPB16).

Sainsburys, New Cross Gate

Table 2a: Estimated Study Area Population and Comparison Goods Expenditure

	Zone 1	Zone 2	Zone 3	Zone 4	Total
<b>2017</b>					
Population	79,631	110,290	64,547	67,343	<b>321,811</b>
Expenditure Per Head (£)	2,974	2,864	3,545	3,902	
Total Expenditure (£m)	236.82	315.87	228.82	262.77	<b>1,044.28</b>
<b>2019</b>					
Population	82,762	114,761	67,935	70,151	<b>335,609</b>
Expenditure Per Head (£)	3,235	3,115	3,856	4,244	
Total Expenditure (£m)	267.72	357.50	261.95	297.74	<b>1,184.91</b>
<b>2024</b>					
Population	88,438	121,454	72,612	74,732	<b>357,236</b>
Expenditure Per Head (£)	3,788	3,629	4,492	4,944	
Total Expenditure (£m)	333.26	440.75	326.16	369.49	<b>1,469.65</b>
<b>Expenditure Growth:</b>					
2019 - 2024 (£m)	65.54	83.24	64.21	71.75	<b>284.74</b>

Notes

1. Population and projections derived from Experian based on study area zones. Experian do not make allowance for new housing provision.
2. 2017 comparison prices derived from Experian Retail Planner Expenditure Reports.
3. Growth rate of 5.5% in 2017 and 3.1% between 2018 - 2024 (Figure 2 of Experian FPBN16).

Table 2b: Per Capita Comparison Expenditure by Category

	Per Capita Expenditure 2017				Per Capita Expenditure 2019				Per Capita Expenditure 2024			
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 1	Zone 2	Zone 3	Zone 4	Zone 1	Zone 2	Zone 3	Zone 4
Clothing & Footwear	986	843	1,015	1,073	964	917	1,104	1,167	1,123	1,088	1,286	1,360
Chemist & Personal	555	557	666	719	604	606	724	781	703	706	844	910
Books & Toys & Gifts	453	447	553	614	493	486	602	668	574	566	701	778
Household textiles	66	67	80	75	72	73	87	82	84	85	101	95
Jewellery, China & Glass	215	207	244	288	234	225	265	313	272	262	309	365
Household Appliances	92	76	103	123	100	83	112	134	117	96	131	156
Audio Visual	224	209	265	310	244	227	289	337	284	265	336	393
Furniture & Furnishings	380	362	492	564	413	394	535	613	481	459	623	715
Hardware, DIY & Decorating	103	96	127	137	112	104	138	149	131	122	161	174
<b>TOTAL</b>	<b>2,974</b>	<b>2,864</b>	<b>3,545</b>	<b>3,902</b>	<b>3,235</b>	<b>3,115</b>	<b>3,856</b>	<b>4,244</b>	<b>3,788</b>	<b>3,629</b>	<b>4,492</b>	<b>4,944</b>

Table 2c: Total Available Comparison Expenditure by Category

	Available Expenditure 2019					Available Expenditure 2024				
	Zone 1	Zone 2	Zone 3	Zone 4	Total	Zone 1	Zone 2	Zone 3	Zone 4	Total
Clothing & Footwear	79.76	105.23	75.00	81.87	341.86	99.28	129.73	93.39	101.60	424.00
Chemist & Personal	49.96	69.53	49.21	54.79	223.49	62.19	85.72	61.28	67.99	277.17
Books & Toys & Gifts	40.79	55.80	40.86	46.85	184.29	50.76	68.79	50.88	58.14	228.57
Household textiles	5.94	8.36	5.91	5.72	25.94	7.40	10.31	7.36	7.10	32.17
Jewellery, China & Glass	19.35	25.84	18.03	21.98	85.20	24.09	31.86	22.45	27.27	105.67
Household Appliances	8.28	9.49	7.61	9.39	34.77	10.31	11.70	9.48	11.65	43.13
Audio Visual	20.16	26.09	19.58	23.65	89.49	25.10	32.16	24.38	29.35	111.00
Furniture & Furnishings	34.21	45.19	36.36	43.04	158.79	42.58	55.71	45.27	53.41	196.96
Hardware, DIY & Decorating	9.27	11.98	9.98	10.45	41.09	11.54	14.77	11.68	12.97	50.97
<b>TOTAL</b>	<b>267.72</b>	<b>357.50</b>	<b>261.95</b>	<b>297.74</b>	<b>1184.91</b>	<b>333.26</b>	<b>440.75</b>	<b>326.16</b>	<b>369.49</b>	<b>1469.65</b>

Notes

1. Growth rate of 5.5% in 2017 and 3.1% between 2018 - 2024 (Figure 2 of Experian FPBN16).

Sainsbury, New Cross Gate

Table 3a: Main Food Turnover at 2019 Primary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	3.0%	2.31	12.4%	12.79	0.0%	0.00	2.5%	1.98	17.09	5.2%
Sainsbury's Local, Lewisham Way, New Cross	0.0%	0.00	0.7%	0.74	0.0%	0.00	0.3%	0.26	1.00	0.3%
Iceland, New Cross Road, New Cross	0.0%	0.00	0.5%	0.53	0.0%	0.00	0.0%	0.00	0.53	0.2%
Local Shops, New Cross town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	37.3%	28.56	6.4%	6.64	0.0%	0.00	0.9%	0.68	35.89	10.9%
Other, Surrey Quays	1.0%	0.77	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.77	0.2%
Waitrose, New Capital Quay, Greenwich	5.6%	4.25	0.4%	0.42	5.7%	4.00	4.0%	3.22	11.90	3.6%
Other, Greenwich	0.3%	0.21	0.0%	0.00	11.0%	7.75	0.0%	0.00	7.97	2.4%
Asda, Thurston Point, Thurston Road, Lewisham	3.3%	2.52	3.4%	3.52	0.4%	0.28	4.3%	3.46	9.78	3.0%
Aldi, Old Kent Road, Lewisham	0.4%	0.27	8.2%	8.45	0.0%	0.00	3.3%	2.61	11.34	3.4%
Tesco Superstore, Lewisham Road, Lewisham	0.3%	0.21	3.4%	3.55	4.6%	3.24	15.1%	12.09	19.09	5.8%
Local shops, Lewisham town centre	3.0%	2.31	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.31	0.7%
Other, Lewisham	0.8%	0.63	3.8%	3.96	4.3%	3.03	15.1%	12.07	19.69	6.0%
Lidl, Bestwood Street, Bermondsey	7.9%	6.07	0.5%	0.53	0.0%	0.00	0.0%	0.00	6.60	2.0%
Iceland, Southwark Park Road, Bermondsey	3.4%	2.58	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.58	0.8%
Other, Bermondsey	0.6%	0.48	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.48	0.1%
Local shops, Bermondsey town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Asda, High Street, Deptford	3.3%	2.52	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.52	0.8%
Iceland, High Street, Deptford	0.3%	0.21	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.21	0.1%
Local Shops, Deptford town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.3%	0.21	10.8%	11.11	0.0%	0.00	0.0%	0.00	11.32	3.4%
Lidl, Bellenden Road, Peckham	0.0%	0.00	5.5%	5.68	0.0%	0.00	0.4%	0.34	6.02	1.8%
Other, Peckham	0.0%	0.00	4.1%	4.26	0.5%	0.35	2.7%	2.18	6.79	2.1%
Local Shops, Peckham town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Brockley Stores	0.0%	0.00	0.0%	0.00	0.5%	0.35	4.6%	3.66	4.01	1.2%
Other Stores, Inside Study Area	0.7%	0.55	0.0%	0.00	4.9%	3.44	1.3%	1.02	5.01	1.5%
Internet	12.4%	9.47	8.1%	8.34	12.1%	8.52	19.4%	15.55	41.88	12.7%
<b>Subtotal - Inside Study Area</b>									<b>224.70</b>	<b>68.0%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	5.3%	4.05	18.2%	18.84	0.0%	0.00	0.0%	0.00	22.89	6.9%
East Dulwich/Dulwich Stores	0.4%	0.27	10.8%	11.14	0.0%	0.00	0.0%	0.00	11.41	3.5%
Charlton Stores	3.4%	2.59	0.0%	0.00	20.5%	14.46	1.6%	1.30	18.35	5.6%
Lee Green Stores	1.1%	0.83	0.0%	0.00	15.5%	10.89	6.8%	5.44	17.16	5.2%
Eltham Stores	0.0%	0.00	0.0%	0.00	4.5%	3.17	0.0%	0.00	3.17	1.0%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	6.9%	5.56	5.56	1.7%
Bermondsey (outside) Stores	2.7%	2.10	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.10	0.6%
Woolwich Stores	0.0%	0.00	0.0%	0.00	6.8%	4.80	0.0%	0.00	4.80	1.5%
Sydenham Stores	0.0%	0.00	1.3%	1.37	0.0%	0.00	5.3%	4.25	5.62	1.7%
Others, Outside Study Area	3.4%	2.58	1.3%	1.37	8.8%	6.20	5.4%	4.35	14.50	4.4%
<b>Subtotal - Outside Study Area</b>									<b>106.56</b>	<b>32.0%</b>
<b>TOTALS</b>	<b>100.0%</b>	<b>76.56</b>	<b>100.0%</b>	<b>103.25</b>	<b>100.0%</b>	<b>70.48</b>	<b>100.0%</b>	<b>80.04</b>	<b>330.34</b>	<b>100.0%</b>

Notes

1. Results from the household survey.
2. It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
3. It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 3b: Main Food Turnover at 2024 Primary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	3.0%	2.50	12.4%	13.68	0.0%	0.00	2.5%	2.13	18.30	5.2%
Sainsbury's Local, Lewisham Way, New Cross	0.0%	0.00	0.7%	0.79	0.0%	0.00	0.3%	0.28	1.07	0.3%
Iceland, New Cross Road, New Cross	0.0%	0.00	0.5%	0.57	0.0%	0.00	0.0%	0.00	0.57	0.2%
Local Shops, New Cross town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	37.3%	30.83	6.4%	7.10	0.0%	0.00	0.9%	0.73	38.67	10.9%
Other, Surrey Quays	1.0%	0.83	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.83	0.2%
Waitrose, New Capital Quay, Greenwich	5.6%	4.59	0.4%	0.45	5.7%	4.32	4.0%	3.47	12.83	3.6%
Other, Greenwich	0.3%	0.23	0.0%	0.00	11.0%	8.37	0.0%	0.00	8.60	2.4%
Asda, Thurston Point, Thurston Road, Lewisham	3.3%	2.72	3.4%	3.76	0.4%	0.30	4.3%	3.73	10.51	3.0%
Aldi, Old Kent Road, Lewisham	0.4%	0.30	8.2%	9.04	0.0%	0.00	3.3%	2.81	12.14	3.4%
Tesco Superstore, Lewisham Road, Lewisham	0.3%	0.23	3.4%	3.79	4.6%	3.50	15.1%	13.01	20.52	5.8%
Local shops, Lewisham town centre	3.0%	2.50	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.50	0.7%
Other, Lewisham	0.8%	0.68	3.8%	4.24	4.3%	3.27	15.1%	12.98	21.17	6.0%
Lidl, Bestwood Street, Bermondsey	7.9%	6.55	0.5%	0.57	0.0%	0.00	0.0%	0.00	7.12	2.0%
Iceland, Southwark Park Road, Bermondsey	3.4%	2.78	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.78	0.8%
Other, Bermondsey	0.6%	0.52	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.52	0.1%
Local shops, Bermondsey town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Asda, High Street, Deptford	3.3%	2.72	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.72	0.8%
Iceland, High Street, Deptford	0.3%	0.23	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.23	0.1%
Local Shops, Bermondsey town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.3%	0.23	10.8%	11.88	0.0%	0.00	0.0%	0.00	12.10	3.4%
Lidl, Bellenden Road, Peckham	0.0%	0.00	5.5%	6.07	0.0%	0.00	0.4%	0.37	6.43	1.8%
Other, Peckham	0.0%	0.00	4.1%	4.55	0.5%	0.38	2.7%	2.34	7.27	2.0%
Local Shops, Peckham town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Brockley Stores	0.0%	0.00	0.0%	0.00	0.5%	0.38	4.6%	3.94	4.32	1.2%
Other Stores, Inside Study Area	0.7%	0.59	0.0%	0.00	4.9%	3.72	1.3%	1.10	5.41	1.5%
Internet	12.4%	10.22	8.1%	8.91	12.1%	9.20	19.4%	16.74	45.06	12.7%
<b>Subtotal - Inside Study Area</b>									<b>241.68</b>	<b>68.0%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	5.3%	4.37	18.2%	20.14	0.0%	0.00	0.0%	0.00	24.51	6.9%
East Dulwich/Dulwich Stores	0.4%	0.30	10.8%	11.91	0.0%	0.00	0.0%	0.00	12.20	3.4%
Charlton Stores	3.4%	2.79	0.0%	0.00	20.5%	15.61	1.6%	1.40	19.80	5.6%
Lee Green Stores	1.1%	0.90	0.0%	0.00	15.5%	11.76	6.8%	5.86	18.51	5.2%
Eltham Stores	0.0%	0.00	0.0%	0.00	4.5%	3.42	0.0%	0.00	3.42	1.0%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	6.9%	5.98	5.98	1.7%
Bermondsey (outside) Stores	2.7%	2.26	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.26	0.6%
Woolwich Stores	0.0%	0.00	0.0%	0.00	6.8%	5.18	0.0%	0.00	5.18	1.5%
Sydenham Stores	0.0%	0.00	1.3%	1.47	0.0%	0.00	5.3%	4.57	6.04	1.7%
Others, Outside Study Area	3.4%	2.78	1.3%	1.47	8.8%	6.69	5.4%	4.68	15.62	4.4%
<b>Subtotal - Outside Study Area</b>									<b>113.64</b>	<b>32.0%</b>
<b>TOTALS</b>	<b>100.0%</b>	<b>82.64</b>	<b>100.0%</b>	<b>110.37</b>	<b>100.0%</b>	<b>76.09</b>	<b>100.0%</b>	<b>86.12</b>	<b>355.22</b>	<b>100.0%</b>

Notes

1. Results from the household survey.
2. It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
3. It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Sainsbury's, New Cross Gate

Table 4a: Main Food Turnover at 2019 Secondary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	0.9%	0.29	14.7%	6.51	0.0%	0.00	6.3%	2.15	8.96	6.3%
Sainsbury's Local, Lewisham Way, New Cross	0.7%	0.23	0.7%	0.31	0.0%	0.00	0.0%	0.00	0.54	0.4%
Iceland, New Cross Road, New Cross	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.5%	0.18	0.18	0.1%
Local Shops, New Cross town centre	0.0%	0.00	4.4%	1.97	0.0%	0.00	0.5%	0.18	2.14	1.5%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	15.3%	5.02	6.0%	2.66	0.0%	0.00	0.7%	0.23	7.91	5.6%
Other, Surrey Quays	0.5%	0.16	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.18	0.1%
Waitrose, New Capital Quay, Greenwich	4.6%	1.51	1.4%	0.63	4.4%	1.33	0.5%	0.18	3.65	2.6%
Other, Greenwich	0.0%	0.00	0.0%	0.00	11.3%	3.40	4.2%	1.45	4.85	3.4%
Asda, Thurston Point, Thurston Road, Lewisham	0.0%	0.00	0.5%	0.24	0.0%	0.00	6.3%	2.15	2.39	1.7%
Aldi, Old Kent Road, Lewisham	3.6%	1.17	1.8%	0.78	0.0%	0.00	4.2%	1.45	3.40	2.4%
Tesco Superstore, Lewisham Road, Lewisham	8.1%	2.64	0.0%	0.00	0.9%	0.26	9.8%	3.36	6.26	4.4%
Local shops, Lewisham town centre	0.0%	0.00	0.5%	0.24	5.7%	1.71	0.0%	0.00	1.95	1.4%
Other, Lewisham	2.3%	0.76	7.8%	3.46	4.4%	1.33	17.5%	6.01	11.57	8.2%
Lidl, Bestwood Street, Bermondsey	4.8%	1.57	0.9%	0.39	0.0%	0.00	4.2%	1.45	3.42	2.4%
Iceland, Southwark Park Road, Bermondsey	9.1%	2.99	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.99	2.1%
Other, Bermondsey	0.7%	0.23	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.23	0.2%
Local shops, Bermondsey town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Asda, High Street, Deptford	5.9%	1.94	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.94	1.4%
Iceland, High Street, Deptford	0.5%	0.16	0.0%	0.00	0.0%	0.00	1.2%	0.40	0.58	0.4%
Local Shops, Deptford town centre	1.4%	0.47	0.0%	0.00	0.0%	0.00	0.7%	0.23	0.70	0.5%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.0%	0.00	21.3%	9.44	0.5%	0.16	0.0%	0.00	9.59	6.8%
Lidl, Bellenden Road, Peckham	0.0%	0.00	2.1%	0.93	0.0%	0.00	0.0%	0.00	0.93	0.7%
Other, Peckham	0.0%	0.00	2.8%	1.24	0.0%	0.00	0.5%	0.18	1.42	1.0%
Local Shops, Peckham town centre	0.0%	0.00	6.6%	2.91	0.0%	0.00	0.0%	0.00	2.91	2.1%
Brockley Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Other Stores, Inside Study Area	25.4%	8.35	7.8%	3.46	23.0%	6.95	5.7%	1.95	20.71	14.6%
Internet	7.4%	2.41	1.4%	0.62	14.2%	4.28	6.2%	2.14	9.45	6.7%
<b>Subtotal - Inside Study Area</b>									<b>100.03</b>	<b>76.9%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	1.2%	0.41	16.5%	7.30	0.0%	0.00	0.0%	0.00	7.70	5.4%
East Dulwich/Dulwich Stores	0.0%	0.00	1.8%	0.78	0.0%	0.00	0.0%	0.00	0.78	0.6%
Charlton Stores	6.6%	2.17	0.0%	0.00	16.4%	4.95	11.9%	4.08	11.19	7.9%
Lee Green Stores	0.0%	0.00	0.0%	0.00	17.6%	5.38	2.0%	0.69	6.07	4.3%
Etham Stores	0.0%	0.00	0.0%	0.00	1.5%	0.46	0.0%	0.00	0.46	0.3%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	5.4%	1.86	1.86	1.3%
Bermondsey (outside) Stores	0.9%	0.29	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.29	0.2%
Woolwich Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Sydenham Stores	0.0%	0.00	0.9%	0.39	0.0%	0.00	7.4%	2.54	2.93	2.1%
Others, Outside Study Area	0.0%	0.00	0.0%	0.00	0.0%	0.00	4.2%	1.45	1.45	1.0%
<b>Subtotal - Outside Study Area</b>									<b>32.75</b>	<b>23.1%</b>
<b>TOTALS</b>	<b>100.0%</b>	<b>32.81</b>	<b>100.0%</b>	<b>44.25</b>	<b>100.0%</b>	<b>30.21</b>	<b>100.0%</b>	<b>34.30</b>	<b>141.58</b>	<b>100.0%</b>

- Notes**  
 1. Results from the household survey.  
 2. It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.  
 3. It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 4b: Main Food Turnover at 2024 Secondary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	0.9%	0.32	14.7%	6.96	0.0%	0.00	6.3%	2.32	9.59	6.3%
Sainsbury's Local, Lewisham Way, New Cross	0.7%	0.25	0.7%	0.33	0.0%	0.00	0.0%	0.00	0.58	0.4%
Iceland, New Cross Road, New Cross	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.5%	0.19	0.19	0.1%
Local Shops, New Cross town centre	0.0%	0.00	4.4%	2.10	0.0%	0.00	0.5%	0.19	2.29	1.5%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	15.3%	5.42	6.0%	2.85	0.0%	0.00	0.7%	0.24	8.51	5.6%
Other, Surrey Quays	0.5%	0.19	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.19	0.1%
Waitrose, New Capital Quay, Greenwich	4.6%	1.63	1.4%	0.67	4.4%	1.44	0.5%	0.19	3.93	2.6%
Other, Greenwich	0.0%	0.00	0.0%	0.00	11.3%	3.67	4.2%	1.56	5.23	3.4%
Asda, Thurston Point, Thurston Road, Lewisham	0.0%	0.00	0.5%	0.25	0.0%	0.00	6.3%	2.32	2.57	1.7%
Aldi, Old Kent Road, Lewisham	3.6%	1.26	1.8%	0.83	0.0%	0.00	4.2%	1.56	3.66	2.4%
Tesco Superstore, Lewisham Road, Lewisham	8.1%	2.85	0.0%	0.00	0.9%	0.28	9.8%	3.62	6.75	4.4%
Local shops, Lewisham town centre	0.0%	0.00	0.5%	0.25	5.7%	1.85	0.0%	0.00	2.10	1.4%
Other, Lewisham	2.3%	0.82	7.8%	3.70	4.4%	1.44	17.5%	6.47	12.43	8.2%
Lidl, Bestwood Street, Bermondsey	4.8%	1.70	0.9%	0.42	0.0%	0.00	4.2%	1.56	3.68	2.4%
Iceland, Southwark Park Road, Bermondsey	9.1%	3.22	0.0%	0.00	0.0%	0.00	0.0%	0.00	3.22	2.1%
Other, Bermondsey	0.7%	0.25	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.25	0.2%
Local shops, Bermondsey town centre	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Asda, High Street, Deptford	5.9%	2.10	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.10	1.4%
Iceland, High Street, Deptford	0.5%	0.19	0.0%	0.00	0.0%	0.00	1.2%	0.43	0.62	0.4%
Local Shops, Bermondsey town centre	1.4%	0.51	0.0%	0.00	0.0%	0.00	0.7%	0.24	0.75	0.5%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.0%	0.00	21.3%	10.09	0.5%	0.17	0.0%	0.00	10.25	6.7%
Lidl, Bellenden Road, Peckham	0.0%	0.00	2.1%	1.00	0.0%	0.00	0.0%	0.00	1.00	0.7%
Other, Peckham	0.0%	0.00	2.8%	1.33	0.0%	0.00	0.5%	0.19	1.52	1.0%
Local Shops, Peckham town centre	0.0%	0.00	6.6%	3.11	0.0%	0.00	0.0%	0.00	3.11	2.0%
Brockley Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Other Stores, Inside Study Area	25.4%	9.01	7.8%	3.70	23.0%	7.50	5.7%	2.10	22.31	14.7%
Internet	7.4%	2.60	1.4%	0.66	14.2%	4.62	6.2%	2.30	10.19	6.7%
<b>Subtotal - Inside Study Area</b>									<b>117.02</b>	<b>76.9%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	1.2%	0.44	16.5%	7.80	0.0%	0.00	0.0%	0.00	8.24	5.4%
East Dulwich/Dulwich Stores	0.0%	0.00	1.8%	0.84	0.0%	0.00	0.0%	0.00	0.84	0.5%
Charlton Stores	6.6%	2.35	0.0%	0.00	16.4%	5.34	11.9%	4.39	12.07	7.9%
Lee Green Stores	0.0%	0.00	0.0%	0.00	17.6%	5.61	2.0%	0.74	6.55	4.3%
Etham Stores	0.0%	0.00	0.0%	0.00	1.5%	0.50	0.0%	0.00	0.50	0.3%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	5.4%	2.00	2.00	1.3%
Bermondsey (outside) Stores	0.9%	0.32	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.32	0.2%
Woolwich Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Sydenham Stores	0.0%	0.00	0.9%	0.42	0.0%	0.00	7.4%	2.73	3.15	2.1%
Others, Outside Study Area	0.0%	0.00	0.0%	0.00	0.0%	0.00	4.2%	1.56	1.56	1.0%
<b>Subtotal - Outside Study Area</b>									<b>35.22</b>	<b>23.1%</b>
<b>TOTALS</b>	<b>100.0%</b>	<b>35.42</b>	<b>100.0%</b>	<b>47.30</b>	<b>100.0%</b>	<b>32.81</b>	<b>100.0%</b>	<b>36.91</b>	<b>152.24</b>	<b>100.0%</b>

- Notes**  
 1. Results from the household survey.  
 2. It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.  
 3. It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.



Sainsbury's, New Cross Gate

Table 5a: Total Main Food Turnover at 2019

Store/Centre	Zones				Turnover (£m)	Total Market Share %
	1	2	3	4		
<b>Inside Study Area</b>						
	£m	£m	£m	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	2.61	19.31	0.00	4.13	26.05	5.5%
Sainsbury's Local, Lewisham Way, New Cross	0.23	1.05	0.00	0.26	1.54	0.3%
Iceland, New Cross Road, New Cross	0.00	0.53	0.00	0.18	0.71	0.2%
Local Shops, New Cross town centre	0.00	1.97	0.00	0.18	2.14	0.5%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	33.59	9.31	0.00	0.91	43.80	9.3%
Other, Surrey Quays	0.95	0.00	0.00	0.00	0.95	0.2%
Waitrose, New Capital Quay, Greenwich	5.77	1.05	5.34	3.40	15.55	3.3%
Other, Greenwich	0.21	0.00	11.15	1.45	12.82	2.7%
Asda, Thurston Point, Thurston Road, Lewisham	2.52	3.76	0.28	5.62	12.17	2.6%
Aldi, Old Kent Road, Lewisham	1.44	9.23	0.00	4.07	14.74	3.1%
Tesco Superstore, Lewisham Road, Lewisham	2.85	3.55	3.50	15.45	25.35	5.4%
Local shops, Lewisham town centre	2.31	0.24	1.71	0.00	4.26	0.9%
Other, Lewisham	1.39	7.43	4.36	18.08	31.26	6.6%
Lidl, Bestwood Street, Bermondsey	7.65	0.92	0.00	1.45	10.02	2.1%
Iceland, Southwark Park Road, Bermondsey	5.57	0.00	0.00	0.00	5.57	1.2%
Other, Bermondsey	0.71	0.00	0.00	0.00	0.71	0.2%
Local shops, Bermondsey town centre	0.00	0.00	0.00	0.00	0.00	0.0%
Asda, High Street, Deptford	4.46	0.00	0.00	0.00	4.46	0.9%
Iceland, High Street, Deptford	0.39	0.00	0.00	0.40	0.79	0.2%
Local Shops, Deptford town centre	0.47	0.00	0.00	0.23	0.70	0.1%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.21	20.54	0.16	0.00	20.91	4.4%
Lidl, Bellenden Road, Peckham	0.00	6.61	0.00	0.34	6.95	1.5%
Other, Peckham	0.00	5.50	0.35	2.35	8.20	1.7%
Local Shops, Peckham town centre	0.00	2.91	0.00	0.00	2.91	0.6%
Brockley Stores	0.00	0.00	0.35	3.66	4.01	0.8%
Other Stores, Inside Study Area	8.89	3.46	10.39	2.97	25.72	5.5%
Internet	11.88	8.95	12.80	17.69	51.32	10.9%
<b>Subtotal - Inside Study Area</b>					<b>333.61</b>	<b>70.7%</b>
<b>Other Stores Outside of Study Area</b>						
Southwark Stores	4.46	26.14	0.00	0.00	30.59	6.5%
East Dulwich/Dulwich Stores	0.27	11.92	0.00	0.00	12.20	2.6%
Charlton Stores	4.76	0.00	19.40	5.38	29.54	6.3%
Lee Green Stores	0.83	0.00	16.27	6.13	23.24	4.9%
Etham Stores	0.00	0.00	3.63	0.00	3.63	0.8%
Catford Stores	0.00	0.00	0.00	7.42	7.42	1.6%
Bermondsey (outside) Stores	2.39	0.00	0.00	0.00	2.39	0.5%
Woolwich Stores	0.00	0.00	4.80	0.00	4.80	1.0%
Sydenham Stores	0.00	1.76	0.00	6.79	8.55	1.8%
Others, Outside Study Area	2.58	1.37	6.20	5.80	15.95	3.4%
<b>Subtotal - Outside Study Area</b>					<b>138.31</b>	<b>29.3%</b>
<b>TOTALS</b>	<b>109.38</b>	<b>147.51</b>	<b>100.69</b>	<b>114.34</b>	<b>471.91</b>	<b>100.0%</b>

**Notes**  
 1. Total derived from Tables 3 and 4.  
 2. It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.  
 3. It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 5b: Total Main Food Turnover at 2024

Store/Centre	Zones				Turnover (£m)	Total Market Share %
	1	2	3	4		
<b>Inside Study Area</b>						
	£m	£m	£m	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	2.81	20.64	0.00	4.45	27.90	5.5%
Sainsbury's Local, Lewisham Way, New Cross	0.25	1.12	0.00	0.28	1.65	0.3%
Iceland, New Cross Road, New Cross	0.00	0.57	0.00	0.19	0.76	0.1%
Local Shops, New Cross town centre	0.00	2.10	0.00	0.19	2.29	0.5%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	36.25	9.95	0.00	0.98	47.18	9.3%
Other, Surrey Quays	1.02	0.00	0.00	0.00	1.02	0.2%
Waitrose, New Capital Quay, Greenwich	6.22	1.12	5.76	3.66	16.76	3.3%
Other, Greenwich	0.23	0.00	12.04	1.56	13.83	2.7%
Asda, Thurston Point, Thurston Road, Lewisham	2.72	4.01	0.30	6.04	13.08	2.6%
Aldi, Old Kent Road, Lewisham	1.56	9.87	0.00	4.38	15.80	3.1%
Tesco Superstore, Lewisham Road, Lewisham	3.08	3.79	3.78	16.62	27.27	5.4%
Local shops, Lewisham town centre	2.50	0.25	1.85	0.00	4.60	0.9%
Other, Lewisham	1.50	7.94	4.71	19.45	33.60	6.6%
Lidl, Bestwood Street, Bermondsey	8.25	0.99	0.00	1.56	10.81	2.1%
Iceland, Southwark Park Road, Bermondsey	6.01	0.00	0.00	0.00	6.01	1.2%
Other, Bermondsey	0.77	0.00	0.00	0.00	0.77	0.2%
Local shops, Bermondsey town centre	0.00	0.00	0.00	0.00	0.00	0.0%
Asda, High Street, Deptford	4.81	0.00	0.00	0.00	4.81	0.9%
Iceland, High Street, Deptford	0.42	0.00	0.00	0.43	0.85	0.2%
Local Shops, Bermondsey town centre	0.51	0.00	0.00	0.24	0.75	0.1%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.23	21.96	0.17	0.00	22.36	4.4%
Lidl, Bellenden Road, Peckham	0.00	7.07	0.00	0.37	7.43	1.5%
Other, Peckham	0.00	5.88	0.38	2.53	8.79	1.7%
Local Shops, Peckham town centre	0.00	3.11	0.00	0.00	3.11	0.6%
Brockley Stores	0.00	0.00	0.38	3.94	4.32	0.9%
Other Stores, Inside Study Area	9.60	3.70	11.22	3.20	27.72	5.5%
Internet	12.82	9.57	13.82	19.03	55.25	10.9%
<b>Subtotal - Inside Study Area</b>					<b>388.70</b>	<b>70.7%</b>
<b>Other Stores Outside of Study Area</b>						
Southwark Stores	4.81	27.94	0.00	0.00	32.75	6.5%
East Dulwich/Dulwich Stores	0.30	12.75	0.00	0.00	13.04	2.6%
Charlton Stores	5.14	0.00	20.95	5.78	31.87	6.3%
Lee Green Stores	0.90	0.00	17.57	6.60	25.07	4.9%
Etham Stores	0.00	0.00	3.91	0.00	3.91	0.8%
Catford Stores	0.00	0.00	0.00	7.98	7.98	1.6%
Bermondsey (outside) Stores	2.58	0.00	0.00	0.00	2.58	0.5%
Woolwich Stores	0.00	0.00	5.18	0.00	5.18	1.0%
Sydenham Stores	0.00	1.89	0.00	7.31	9.19	1.8%
Others, Outside Study Area	2.78	1.47	6.69	6.25	17.19	3.4%
<b>Subtotal - Outside Study Area</b>					<b>148.76</b>	<b>29.3%</b>
<b>TOTALS</b>	<b>118.05</b>	<b>157.68</b>	<b>108.70</b>	<b>123.03</b>	<b>507.46</b>	<b>100.0%</b>

**Notes**  
 1. Total derived from Tables 3 and 4.  
 2. It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.  
 3. It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Sainsbury, New Cross Gate

Table 6a: Top Up Turnover at 2019 Primary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	0.5%	0.16	8.3%	3.69	0.0%	0.00	0.0%	0.00	3.85	2.6%
Sainsbury's Local, Lewisham Way, New Cross	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Iceland, New Cross Road, New Cross	0.0%	0.00	1.3%	0.57	0.0%	0.00	0.6%	0.20	0.77	0.6%
Local Shops, New Cross town centre	0.0%	0.00	0.7%	0.32	0.0%	0.00	0.0%	0.00	0.32	0.2%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	19.4%	6.36	42%	1.87	0.0%	0.00	0.0%	0.00	8.23	5.9%
Other, Surrey Quays	8.9%	2.94	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.94	2.1%
Waitrose, New Capital Quay, Greenwich	5.2%	1.71	3.7%	1.62	1.8%	0.56	0.6%	0.20	4.08	2.9%
Other, Greenwich	0.0%	0.00	0.0%	0.00	34.0%	10.27	-1.0%	0.35	10.62	7.7%
Asda, Thurston Point, Thurston Road, Lewisham	0.5%	0.16	0.0%	0.00	0.0%	0.00	3.2%	1.10	1.27	0.9%
Aldi, Old Kent Road, Lewisham	0.4%	0.13	6.4%	2.84	0.0%	0.00	3.7%	1.27	4.24	3.1%
Tesco Superstore, Lewisham Road, Lewisham	0.4%	0.13	0.0%	0.00	6.1%	1.85	6.0%	2.07	4.05	2.9%
Local Shops, Lewisham town centre	4.2%	1.39	0.6%	0.25	4.7%	1.41	6.5%	2.23	5.28	3.8%
Other, Lewisham	1.7%	0.54	3.6%	1.60	4.1%	1.23	28.8%	9.89	13.26	9.6%
Lidl, Bestwood Street, Bermondsey	5.1%	1.68	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.68	1.2%
Iceland, Southwark Park Road, Bermondsey	1.4%	0.46	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.46	0.3%
Other, Bermondsey	2.5%	0.83	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.83	0.6%
Local Shops, Bermondsey town centre	7.0%	2.30	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.30	1.7%
Asda, High Street, Deptford	0.8%	0.25	0.4%	0.19	0.0%	0.00	0.6%	0.20	0.65	0.5%
Iceland, High Street, Deptford	8.6%	2.81	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.81	2.0%
Other, Deptford	3.1%	1.00	4.8%	2.14	0.0%	0.00	0.6%	0.20	3.34	2.4%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.0%	0.00	8.7%	3.86	0.0%	0.00	0.0%	0.00	3.86	2.8%
Lidl, Bellenden Road, Peckham	0.0%	0.00	1.3%	0.57	0.0%	0.00	0.0%	0.00	0.57	0.4%
Other, Peckham	0.4%	0.13	16.1%	7.12	0.0%	0.00	3.7%	1.27	8.51	6.1%
Local Stores, Peckham town centre	0.0%	0.00	5.5%	2.44	0.0%	0.00	0.0%	0.00	2.44	1.8%
Brockley Stores	3.2%	1.05	4.6%	2.04	0.0%	0.00	12.4%	4.26	7.36	5.3%
Other Stores, Inside Study Area	9.1%	3.00	1.7%	0.77	18.6%	5.62	7.6%	2.66	12.06	8.7%
Internet	0.0%	0.00	0.0%	0.00	8.9%	2.70	-4.9%	1.68	4.38	3.2%
<b>Subtotal - Inside Study Area</b>									<b>107.34</b>	<b>77.4%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	3.2%	1.05	5.7%	2.53	0.0%	0.00	0.0%	0.00	3.58	2.6%
East Dulwich/Dulwich Stores	0.0%	0.00	14.0%	6.20	0.0%	0.00	0.0%	0.00	6.20	4.5%
Charlton Stores	4.2%	1.39	0.0%	0.00	1.7%	0.51	0.0%	0.00	1.90	1.4%
Lee Green Stores	0.0%	0.00	0.0%	0.00	14.5%	4.39	10.6%	3.65	8.04	5.8%
Eltham Stores	0.0%	0.00	0.0%	0.00	1.0%	0.30	0.0%	0.00	0.30	0.2%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.5%	0.85	0.85	0.6%
Bermondsey (outside) Stores	4.5%	1.47	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.47	1.1%
Woolwich Stores	0.6%	0.21	0.0%	0.00	4.0%	1.20	0.0%	0.00	1.41	1.0%
Sydenham Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.6%	0.20	0.20	0.1%
Others, Outside Study Area	5.1%	1.68	8.2%	3.61	0.6%	0.17	5.9%	2.02	7.48	5.4%
<b>Subtotal - Outside Study Area</b>									<b>31.41</b>	<b>22.6%</b>
<b>TOTALS</b>	<b>100.0%</b>	<b>32.81</b>	<b>100.0%</b>	<b>44.25</b>	<b>100.0%</b>	<b>30.21</b>	<b>100.0%</b>	<b>34.30</b>	<b>138.76</b>	<b>100.0%</b>

Notes

- Results from the household survey.
- It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
- It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 6b: Top Up Turnover at 2024 Primary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	0.5%	0.18	8.3%	3.94	0.0%	0.00	0.0%	0.00	4.12	2.7%
Sainsbury's Local, Lewisham Way, New Cross	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Iceland, New Cross Road, New Cross	0.0%	0.00	1.3%	0.61	0.0%	0.00	0.6%	0.21	0.83	0.5%
Local Shops, New Cross town centre	0.0%	0.00	0.7%	0.34	0.0%	0.00	0.0%	0.00	0.34	0.2%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	19.4%	6.87	42%	2.00	0.0%	0.00	0.0%	0.00	8.87	5.8%
Other, Surrey Quays	8.9%	3.17	0.0%	0.00	0.0%	0.00	0.0%	0.00	3.17	2.1%
Waitrose, New Capital Quay, Greenwich	5.2%	1.84	3.7%	1.73	1.8%	0.60	0.6%	0.21	4.38	2.9%
Other, Greenwich	0.0%	0.00	0.0%	0.00	34.0%	11.08	-1.0%	0.38	11.46	7.5%
Asda, Thurston Point, Thurston Road, Lewisham	0.5%	0.18	0.0%	0.00	0.0%	0.00	3.2%	1.16	1.36	0.9%
Aldi, Old Kent Road, Lewisham	0.4%	0.14	6.4%	3.04	0.0%	0.00	3.7%	1.37	4.54	3.0%
Tesco Superstore, Lewisham Road, Lewisham	0.4%	0.14	0.0%	0.00	6.1%	1.99	6.0%	2.23	4.36	2.9%
Local Shops, Lewisham town centre	4.2%	1.50	0.6%	0.27	4.7%	1.53	6.5%	2.40	5.69	3.7%
Other, Lewisham	1.7%	0.59	3.6%	1.71	4.1%	1.33	28.8%	10.64	14.26	9.4%
Lidl, Bestwood Street, Bermondsey	5.1%	1.81	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.81	1.2%
Iceland, Southwark Park Road, Bermondsey	1.4%	0.50	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.50	0.3%
Other, Bermondsey	2.5%	0.89	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.89	0.6%
Local Shops, Bermondsey town centre	7.0%	2.48	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.48	1.6%
Asda, High Street, Deptford	0.8%	0.27	0.4%	0.21	0.0%	0.00	0.6%	0.21	0.69	0.5%
Iceland, High Street, Deptford	8.6%	3.04	0.0%	0.00	0.0%	0.00	0.0%	0.00	3.04	2.0%
Other, Deptford	3.1%	1.08	4.8%	2.29	0.0%	0.00	0.6%	0.21	3.59	2.4%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.0%	0.00	8.7%	4.12	0.0%	0.00	0.0%	0.00	4.12	2.7%
Lidl, Bellenden Road, Peckham	0.0%	0.00	1.3%	0.61	0.0%	0.00	0.0%	0.00	0.61	0.4%
Other, Peckham	0.4%	0.14	16.1%	7.61	0.0%	0.00	3.7%	1.37	9.11	6.0%
Local Stores, Peckham town centre	0.0%	0.00	5.5%	2.61	0.0%	0.00	0.0%	0.00	2.61	1.7%
Brockley Stores	3.2%	1.13	4.6%	2.19	0.0%	0.00	12.4%	4.59	7.90	5.2%
Other Stores, Inside Study Area	9.1%	3.24	1.7%	0.82	18.6%	6.07	7.6%	2.67	13.00	8.5%
Internet	0.0%	0.00	0.0%	0.00	8.9%	2.92	-4.9%	1.81	4.73	3.1%
<b>Subtotal - Inside Study Area</b>									<b>118.48</b>	<b>77.8%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	3.2%	1.13	5.7%	2.70	0.0%	0.00	0.0%	0.00	3.84	2.5%
East Dulwich/Dulwich Stores	0.0%	0.00	14.0%	6.63	0.0%	0.00	0.0%	0.00	6.63	4.4%
Charlton Stores	4.2%	1.50	0.0%	0.00	1.7%	0.55	0.0%	0.00	2.05	1.3%
Lee Green Stores	0.0%	0.00	0.0%	0.00	14.5%	4.74	10.6%	3.93	8.67	5.7%
Eltham Stores	0.0%	0.00	0.0%	0.00	1.0%	0.32	0.0%	0.00	0.32	0.2%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	2.5%	0.91	0.91	0.6%
Bermondsey (outside) Stores	4.5%	1.58	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.58	1.0%
Woolwich Stores	0.6%	0.23	0.0%	0.00	4.0%	1.30	0.0%	0.00	1.52	1.0%
Sydenham Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.6%	0.21	0.21	0.1%
Others, Outside Study Area	5.1%	1.81	8.2%	3.86	0.6%	0.18	5.9%	2.17	8.02	5.3%
<b>Subtotal - Outside Study Area</b>									<b>33.76</b>	<b>22.2%</b>
<b>TOTALS</b>	<b>100.0%</b>	<b>35.42</b>	<b>100.0%</b>	<b>47.30</b>	<b>100.0%</b>	<b>32.81</b>	<b>100.0%</b>	<b>36.91</b>	<b>152.23</b>	<b>100.0%</b>

Notes

- Results from the household survey.
- It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
- It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Sainsbury's, New Cross Gate

Table 7a: Top Up Turnover at 2019 Secondary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	7.65%	1.10	5.69%	1.08	0.00%	0.00	0.00%	0.00	2.18	3.6%
Sainsbury's Local, Lewisham Way, New Cross	0.82%	0.12	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.12	0.2%
Iceland, New Cross Road, New Cross	0.00%	0.00	1.69%	0.32	0.00%	0.00	0.00%	0.00	0.32	0.5%
Local Shops, New Cross town centre	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	0.00%	0.00	1.02%	0.19	0.00%	0.00	0.00%	0.00	0.19	0.3%
Other, Surrey Quays	9.80%	1.38	0.00%	0.00	0.00%	0.00	0.00%	0.00	1.38	2.3%
Waitrose, New Capital Quay, Greenwich	0.82%	0.12	1.02%	0.19	18.26%	2.36	0.00%	0.00	2.67	4.4%
Other, Greenwich	0.00%	0.00	0.00%	0.00	18.15%	2.35	0.86%	0.13	2.48	4.1%
Asda, Thurston Point, Thurston Road, Lewisham	0.00%	0.00	0.00%	0.00	0.00%	0.00	16.57%	2.44	2.44	4.0%
Aldi, Old Kent Road, Lewisham	3.23%	0.45	1.02%	0.19	0.00%	0.00	0.00%	0.00	0.65	1.1%
Tesco Superstore, Lewisham Road, Lewisham	0.00%	0.00	1.39%	0.25	12.08%	1.56	1.42%	0.21	2.03	3.3%
Local Shops, Lewisham town centre	6.79%	0.95	1.02%	0.19	0.00%	0.00	4.81%	0.71	1.86	3.1%
Other, Lewisham	2.41%	0.34	10.87%	2.06	0.00%	0.00	9.88%	1.45	3.85	6.4%
Lidl, Bestwood Street, Bermondsey	2.17%	0.31	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.31	0.5%
Iceland, Southwark Park Road, Bermondsey	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Other, Bermondsey	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Local Shops, Bermondsey town centre	0.82%	0.12	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.12	0.2%
Asda, High Street, Deptford	8.98%	1.26	0.00%	0.00	0.00%	0.00	0.00%	0.00	1.26	2.1%
Iceland, High Street, Deptford	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Other, Deptford	9.24%	1.30	1.69%	0.32	0.00%	0.00	0.00%	0.00	1.62	2.7%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.00%	0.00	2.72%	0.52	0.00%	0.00	0.00%	0.00	0.52	0.8%
Lidl, Bellenden Road, Peckham	0.00%	0.00	5.02%	0.95	0.00%	0.00	0.00%	0.00	0.95	1.6%
Other, Peckham	0.00%	0.00	15.63%	2.96	0.00%	0.00	0.00%	0.00	2.96	4.9%
Local Stores, Peckham town centre	0.00%	0.00	13.59%	2.58	0.00%	0.00	0.00%	0.00	2.58	4.2%
Brookley Stores	0.00%	0.00	1.33%	0.25	0.00%	0.00	18.94%	2.78	3.04	5.0%
Other Stores, Inside Study Area	41.43%	5.83	8.41%	1.59	35.57%	4.61	13.86%	2.04	14.06	23.2%
Internet	0.00%	0.00	0.00%	0.00	1.43%	0.18	0.00%	0.00	0.18	0.3%
<b>Subtotal - Inside Study Area</b>									<b>47.76</b>	<b>78.7%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	4.6%	0.64	12.3%	2.33	0.0%	0.00	7.1%	1.05	4.02	6.6%
East Dulwich/Dulwich Stores	0.0%	0.00	13.9%	2.64	0.0%	0.00	0.0%	0.00	2.64	4.4%
Charlton Stores	0.0%	0.00	1.7%	0.32	4.7%	0.61	0.0%	0.00	0.93	1.5%
Lee Green Stores	0.0%	0.00	0.0%	0.00	6.9%	0.89	8.8%	1.30	2.19	3.6%
Etham Stores	1.1%	0.15	0.0%	0.00	2.9%	0.38	9.4%	1.39	1.91	3.2%
Catford Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	1.1%	0.16	0.16	0.3%
Bermondsey (outside) Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Woolwich Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Sydenham Stores	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.0%
Others, Outside Study Area	0.0%	0.00	0.0%	0.00	0.0%	0.00	7.1%	1.05	1.05	1.7%
<b>Subtotal - Outside Study Area</b>									<b>12.92</b>	<b>21.3%</b>
<b>TOTALS</b>	<b>100%</b>	<b>14.06</b>	<b>100%</b>	<b>18.06</b>	<b>100%</b>	<b>12.95</b>	<b>100%</b>	<b>14.70</b>	<b>60.67</b>	<b>100.0%</b>

Notes

- Results from household survey.
- It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
- It is assumed 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 7b: Top Up Turnover at 2024 Secondary Destination

Store/Centre	Zones								Turnover (£m)	Total Market Share %
	1		2		3		4			
Inside Study Area	%	£m	%	£m	%	£m	%	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	7.65%	1.19	5.69%	1.15	0.00%	0.00	0.00%	0.00	2.35	3.6%
Sainsbury's Local, Lewisham Way, New Cross	0.82%	0.12	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.12	0.2%
Iceland, New Cross Road, New Cross	0.00%	0.00	1.69%	0.34	0.00%	0.00	0.00%	0.00	0.34	0.5%
Local Shops, New Cross town centre	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	0.00%	0.00	1.02%	0.21	0.00%	0.00	0.00%	0.00	0.21	0.3%
Other, Surrey Quays	9.80%	1.49	0.00%	0.00	0.00%	0.00	0.00%	0.00	1.49	2.3%
Waitrose, New Capital Quay, Greenwich	0.82%	0.12	1.02%	0.21	18.26%	2.55	0.00%	0.00	2.88	4.4%
Other, Greenwich	0.00%	0.00	0.00%	0.00	18.15%	2.54	0.86%	0.14	2.67	4.1%
Asda, Thurston Point, Thurston Road, Lewisham	0.00%	0.00	0.00%	0.00	0.00%	0.00	16.57%	2.62	2.62	4.0%
Aldi, Old Kent Road, Lewisham	3.23%	0.49	1.02%	0.21	0.00%	0.00	0.00%	0.00	0.70	1.1%
Tesco Superstore, Lewisham Road, Lewisham	0.00%	0.00	1.39%	0.27	12.08%	1.69	1.42%	0.22	2.18	3.3%
Local Shops, Lewisham town centre	6.79%	1.03	1.02%	0.21	0.00%	0.00	4.81%	0.76	2.00	3.1%
Other, Lewisham	2.41%	0.37	10.87%	2.20	0.00%	0.00	9.88%	1.56	4.13	6.3%
Lidl, Bestwood Street, Bermondsey	2.17%	0.33	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.33	0.5%
Iceland, Southwark Park Road, Bermondsey	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Other, Bermondsey	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Local Shops, Bermondsey town centre	0.82%	0.12	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.12	0.2%
Asda, High Street, Deptford	8.98%	1.36	0.00%	0.00	0.00%	0.00	0.00%	0.00	1.36	2.1%
Iceland, High Street, Deptford	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Other, Deptford	9.24%	1.40	1.69%	0.34	0.00%	0.00	0.00%	0.00	1.75	2.7%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.00%	0.00	2.72%	0.55	0.00%	0.00	0.00%	0.00	0.55	0.8%
Lidl, Bellenden Road, Peckham	0.00%	0.00	5.02%	1.02	0.00%	0.00	0.00%	0.00	1.02	1.6%
Other, Peckham	0.00%	0.00	15.63%	3.17	0.00%	0.00	0.00%	0.00	3.17	4.9%
Local Stores, Peckham town centre	0.00%	0.00	13.59%	2.76	0.00%	0.00	0.00%	0.00	2.76	4.2%
Brookley Stores	0.00%	0.00	1.33%	0.27	0.00%	0.00	18.94%	3.00	3.27	5.0%
Other Stores, Inside Study Area	41.43%	6.29	8.41%	1.70	35.57%	4.97	13.86%	2.19	15.16	23.2%
Internet	0.00%	0.00	0.00%	0.00	1.43%	0.20	0.00%	0.00	0.20	0.3%
<b>Subtotal - Inside Study Area</b>									<b>51.37</b>	<b>78.7%</b>
<b>Other Stores Outside of Study Area</b>										
Southwark Stores	4.58%	0.70	12.29%	2.49	0.00%	0.00	7.13%	1.13	4.32	6.6%
East Dulwich/Dulwich Stores	0.00%	0.00	13.93%	2.62	0.00%	0.00	0.00%	0.00	2.62	4.3%
Charlton Stores	0.00%	0.00	1.69%	0.34	4.73%	0.66	0.00%	0.00	1.00	1.5%
Lee Green Stores	0.00%	0.00	0.00%	0.00	6.87%	0.96	8.85%	1.40	2.36	3.6%
Etham Stores	1.06%	0.16	0.00%	0.00	2.92%	0.41	9.44%	1.43	2.06	3.2%
Catford Stores	0.00%	0.00	0.00%	0.00	0.00%	0.00	1.12%	0.18	0.18	0.3%
Bermondsey (outside) Stores	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Woolwich Stores	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Sydenham Stores	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00	0.0%
Others, Outside Study Area	0.00%	0.00	0.00%	0.00	0.00%	0.00	7.13%	1.13	1.13	1.7%
<b>Subtotal - Outside Study Area</b>									<b>13.87</b>	<b>21.3%</b>
<b>TOTALS</b>	<b>100%</b>	<b>15.18</b>	<b>100%</b>	<b>20.27</b>	<b>100%</b>	<b>13.98</b>	<b>100%</b>	<b>15.82</b>	<b>65.24</b>	<b>100.0%</b>

Notes

- Results from household survey.
- It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
- It is assumed 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Sainsbury's, New Cross Gate

Table 8a: Total Top Up Turnover at 2019

Store/Centre	Zones				Turnover (£m)	Total Market Share %
	1	2	3	4		
<b>Inside Study Area</b>						
	£m	£m	£m	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	1.27	4.77	0.00	0.00	6.04	3.0%
Sainsbury's Local, Lewisham Way, New Cross	0.12	0.00	0.00	0.00	0.12	0.1%
Island, New Cross Road, New Cross	0.00	0.90	0.00	0.20	1.09	0.5%
Local Shops, New Cross town centre	0.00	0.32	0.00	0.00	0.32	0.2%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	6.36	2.07	0.00	0.00	8.43	4.2%
Other, Surrey Quays	4.31	0.00	0.00	0.00	4.31	2.1%
Waitrose, New Capital Quay, Greenwich	1.82	1.81	2.92	0.20	6.75	3.3%
Other, Greenwich	0.00	0.00	12.61	0.46	13.09	6.5%
Asda, Thurston Point, Thurston Road, Lewisham	0.16	0.00	0.00	3.54	3.70	1.8%
Aldi, Old Kent Road, Lewisham	0.58	3.03	0.00	1.27	4.89	2.4%
Tesco Superstore, Lewisham Road, Lewisham	0.13	0.25	3.41	2.28	6.07	3.0%
Local Shops, Lewisham town centre	2.34	0.45	1.41	2.93	7.14	3.5%
Other, Lewisham	0.88	3.66	1.23	11.34	17.12	8.5%
Lidl, Bestwood Street, Bermondsey	1.98	0.00	0.00	0.00	1.98	1.0%
Island, Southwark Park Road, Bermondsey	0.46	0.00	0.00	0.00	0.46	0.2%
Other, Bermondsey	0.83	0.00	0.00	0.00	0.83	0.4%
Local Shops, Bermondsey town centre	2.41	0.00	0.00	0.00	2.41	1.2%
Asda, High Street, Deptford	1.52	0.19	0.00	0.20	1.91	0.9%
Island, High Street, Deptford	2.81	0.00	0.00	0.00	2.81	1.4%
Other, Deptford	2.30	2.46	0.00	0.20	4.96	2.5%
Morrisons, Aylesham Centre, Fye Lane, Peckham	0.00	4.37	0.00	0.00	4.37	2.2%
Lidl, Bellenden Road, Peckham	0.00	1.53	0.00	0.00	1.53	0.8%
Other, Peckham	0.13	10.08	0.00	1.27	11.48	5.7%
Local Stores, Peckham town centre	0.00	5.02	0.00	0.00	5.02	2.5%
Brookley Stores	1.05	2.30	0.00	7.05	10.39	5.1%
Other Stores, Inside Study Area	8.83	2.36	10.23	4.70	26.12	12.9%
Internet	0.00	0.00	2.89	1.68	4.57	2.3%
<b>Subtotal - Inside Study Area</b>					<b>157.91</b>	<b>78.1%</b>
<b>Other Stores Outside of Study Area</b>						
Southwark Stores	1.69	4.86	0.00	1.05	7.60	3.8%
East Dulwich/Dulwich Stores	0.00	8.84	0.00	0.00	8.84	4.4%
Charlton Stores	1.39	0.32	1.12	0.00	2.83	1.4%
Lee Green Stores	0.00	0.00	5.28	4.95	10.23	5.1%
Eltham Stores	0.15	0.00	0.67	1.39	2.21	1.1%
Catford Stores	0.00	0.00	0.00	1.01	1.01	0.5%
Bermondsey (outside) Stores	1.47	0.00	0.00	0.00	1.47	0.7%
Woolwich Stores	0.21	0.00	1.20	0.00	1.41	0.7%
Sydenham Stores	0.00	0.00	0.00	0.20	0.20	0.1%
Others, Outside Study Area	1.68	3.61	0.17	3.07	8.52	4.2%
<b>Subtotal - Outside Study Area</b>					<b>44.33</b>	<b>21.9%</b>
<b>TOTALS</b>	<b>46.88</b>	<b>63.21</b>	<b>43.15</b>	<b>49.00</b>	<b>202.24</b>	<b>100.0%</b>

Notes

- Total derived from Tables 6 and 7.
- It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
- It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 8b: Total Top Up Turnover at 2024

Store/Centre	Zones				Turnover (£m)	Total Market Share %
	1	2	3	4		
<b>Inside Study Area</b>						
	£m	£m	£m	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	1.37	5.10	0.00	0.00	6.47	3.0%
Sainsbury's Local, Lewisham Way, New Cross	0.12	0.00	0.00	0.00	0.12	0.1%
Island, New Cross Road, New Cross	0.00	0.96	0.00	0.21	1.17	0.5%
Local Shops, New Cross town centre	0.00	0.34	0.00	0.00	0.34	0.2%
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	6.87	2.21	0.00	0.00	9.07	4.2%
Other, Surrey Quays	4.66	0.00	0.00	0.00	4.66	2.1%
Waitrose, New Capital Quay, Greenwich	1.96	1.94	3.15	0.21	7.27	3.3%
Other, Greenwich	0.00	0.00	13.62	0.51	14.13	6.5%
Asda, Thurston Point, Thurston Road, Lewisham	0.16	0.00	0.00	3.81	3.96	1.8%
Aldi, Old Kent Road, Lewisham	0.63	3.24	0.00	1.37	5.24	2.4%
Tesco Superstore, Lewisham Road, Lewisham	0.14	0.27	3.68	2.46	6.54	3.0%
Local Shops, Lewisham town centre	2.53	0.48	1.53	3.16	7.69	3.5%
Other, Lewisham	0.95	3.91	1.33	12.20	18.40	8.5%
Lidl, Bestwood Street, Bermondsey	2.14	0.00	0.00	0.00	2.14	1.0%
Island, Southwark Park Road, Bermondsey	0.50	0.00	0.00	0.00	0.50	0.2%
Other, Bermondsey	0.89	0.00	0.00	0.00	0.89	0.4%
Local Shops, Bermondsey town centre	2.60	0.00	0.00	0.00	2.60	1.2%
Asda, High Street, Deptford	1.64	0.21	0.00	0.21	2.06	0.9%
Island, High Street, Deptford	3.04	0.00	0.00	0.00	3.04	1.4%
Other, Deptford	2.49	2.63	0.00	0.21	5.33	2.5%
Morrisons, Aylesham Centre, Fye Lane, Peckham	0.00	4.67	0.00	0.00	4.67	2.1%
Lidl, Bellenden Road, Peckham	0.00	1.63	0.00	0.00	1.63	0.8%
Other, Peckham	0.14	10.78	0.00	1.37	12.28	5.6%
Local Stores, Peckham town centre	0.00	5.37	0.00	0.00	5.37	2.5%
Brookley Stores	1.13	2.46	0.00	7.58	11.17	5.1%
Other Stores, Inside Study Area	9.53	2.53	11.04	5.06	28.15	12.9%
Internet	0.00	0.00	3.12	1.81	4.93	2.3%
<b>Subtotal - Inside Study Area</b>					<b>169.85</b>	<b>78.1%</b>
<b>Other Stores Outside of Study Area</b>						
Southwark Stores	1.83	5.20	0.00	1.13	8.15	3.7%
East Dulwich/Dulwich Stores	0.00	9.45	0.00	0.00	9.45	4.3%
Charlton Stores	1.50	0.34	1.21	0.00	3.05	1.4%
Lee Green Stores	0.00	0.00	5.70	5.33	11.03	5.1%
Eltham Stores	0.16	0.00	0.73	1.49	2.38	1.1%
Catford Stores	0.00	0.00	0.00	1.09	1.09	0.5%
Bermondsey (outside) Stores	1.58	0.00	0.00	0.00	1.58	0.7%
Woolwich Stores	0.23	0.00	1.30	0.00	1.52	0.7%
Sydenham Stores	0.00	0.00	0.00	0.21	0.21	0.1%
Others, Outside Study Area	1.81	3.86	0.18	3.30	9.15	4.2%
<b>Subtotal - Outside Study Area</b>					<b>47.63</b>	<b>21.9%</b>
<b>TOTALS</b>	<b>50.60</b>	<b>67.57</b>	<b>46.59</b>	<b>52.73</b>	<b>217.48</b>	<b>100.0%</b>

Notes

- Total derived from Tables 6 and 7.
- It is assumed that 70% of overall convenience expenditure will be on main food shopping. The balance will be spent on top-up shopping.
- It is assumed that 70% of expenditure will be spent at the primary destination and 30% at the secondary destination.

Table 9a: Total Food Turnover at 2019

Store/Centre	Zones				Turnover (£m)	Total Market Share %
	1	2	3	4		
<b>Inside Study Area</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>		
Sainsbury's Superstore, New Cross Road, New Cross Gate	3.87	24.07	0.00	4.13	32.08	4.8%
Sainsbury's Local, Lewisham Way, New Cross	0.34	1.05	0.00	0.26	1.66	0.2%
Iceland, New Cross Road, New Cross	0.00	1.43	0.00	0.37	1.80	0.3%
Local Shops, New Cross town centre	0.00	2.29	0.00	0.18	2.46	0.4%
New Cross District Centre 'Other' Sub-total					5.92	0.9%
<b>New Cross District Centre Total</b>					<b>38.00</b>	<b>5.6%</b>
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	39.95	11.37	0.00	0.91	52.23	7.7%
Other, Surrey Quays	5.26	0.00	0.00	0.00	5.26	0.8%
Waitrose, New Capital Quay, Greenwich	7.59	2.86	8.25	3.60	22.30	3.3%
Other, Greenwich	0.21	0.00	23.77	1.93	25.91	3.8%
Asda, Thurston Point, Thurston Road, Lewisham	2.69	3.76	0.28	9.15	15.87	2.4%
Aldi, Old Kent Road, Lewisham	2.02	12.27	0.00	5.34	19.63	2.9%
Tesco Superstore, Lewisham Road, Lewisham	2.98	3.80	6.91	17.73	31.42	4.7%
Local shops, Lewisham town centre	4.66	0.68	3.13	2.93	11.40	1.7%
Other, Lewisham	2.27	11.09	5.59	29.42	48.38	7.2%
Lidl, Bestwood Street, Bermondsey	9.63	0.92	0.00	1.45	12.01	1.8%
Iceland, Southwark Park Road, Bermondsey	6.03	0.00	0.00	0.00	6.03	0.9%
Other, Bermondsey	1.54	0.00	0.00	0.00	1.54	0.2%
Local shops, Bermondsey town centre	2.41	0.00	0.00	0.00	2.41	0.4%
Asda, High Street, Deptford	5.97	0.19	0.00	0.20	6.37	0.9%
Iceland, High Street, Deptford	3.20	0.00	0.00	0.40	3.60	0.5%
Local Shops, Deptford town centre	2.77	2.46	0.00	0.43	5.66	0.8%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.21	24.92	0.16	0.00	25.28	3.8%
Lidl, Bellenden Road, Peckham	0.00	8.14	0.00	0.34	8.48	1.3%
Other, Peckham	0.13	15.58	0.35	3.62	19.68	2.9%
Local Shops, Peckham town centre	0.00	7.93	0.00	0.00	7.93	1.2%
Brockley Stores	1.05	2.30	0.35	10.70	14.40	2.1%
Other Stores, Inside Study Area	17.72	5.83	20.62	7.68	51.84	7.7%
Internet	11.88	8.95	15.69	19.37	55.89	8.3%
<b>Subtotal - Inside Study Area</b>					<b>491.52</b>	<b>72.9%</b>
<b>Other Stores Outside of Study Area</b>						
Southwark Stores	6.15	31.00	0.00	1.05	38.20	5.7%
East Dulwich/Dulwich Stores	0.27	20.76	0.00	0.00	21.04	3.1%
Charlton Stores	6.15	0.32	20.53	5.38	32.37	4.8%
Lee Green Stores	0.83	0.00	21.55	11.09	33.47	5.0%
Eltham Stores	0.15	0.00	4.30	1.39	5.84	0.9%
Calford Stores	0.00	0.00	0.00	8.43	8.43	1.3%
Bermondsey (outside) Stores	3.85	0.00	0.00	0.00	3.85	0.6%
Woolwich Stores	0.21	0.00	6.00	0.00	6.21	0.9%
Sydenham Stores	0.00	1.76	0.00	6.99	8.75	1.3%
Others, Outside Study Area	4.26	4.98	6.37	8.87	24.48	3.6%
<b>Subtotal - Outside Study Area</b>	<b>21.87</b>	<b>58.83</b>	<b>58.75</b>	<b>43.19</b>	<b>182.64</b>	<b>27.1%</b>
<b>TOTALS</b>	<b>156.25</b>	<b>210.72</b>	<b>143.84</b>	<b>163.34</b>	<b>674.16</b>	<b>100.0%</b>

## Notes

1. Total turnover derived from Tables 5a and Table 8a.

Sainsbury's, New Cross Gate

Table 10a: Estimated Comparison Goods Turnover at 2019

Store/Centre	Zone								Total £m
	1		2		3		4		
	%	£m	%	£m	%	£m	%	£m	
Sainsbury's Superstore, New Cross Road, New Cross Gate									8.19
Clothing & Footwear	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Chemist & Personal	0.0%	0.25	9.7%	6.76	0.0%	0.00	0.0%	0.00	7.01
Books & Toys & Gifts	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Household Textiles	0.0%	0.03	0.0%	0.05	0.0%	0.00	0.0%	0.00	0.08
Jewellery, China & Glass	0.0%	0.00	1.0%	0.25	0.0%	0.00	0.7%	0.15	0.40
Household Appliances	0.0%	0.00	6.0%	0.57	0.0%	0.00	0.0%	0.00	0.57
Audio Visual	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.6%	0.13	0.13
Furniture & Furnishings	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Hardware, DIY & Decorating	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
<b>New Cross District Centre</b>									11.32
Clothing & Footwear	0.0%	0.00	0.8%	0.85	0.0%	0.00	0.0%	0.00	0.85
Chemist & Personal	4.0%	2.02	5.8%	4.05	0.0%	0.00	0.3%	0.19	6.26
Books & Toys & Gifts	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Household Textiles	0.0%	0.00	6.2%	0.62	0.0%	0.00	0.8%	0.03	0.55
Jewellery, China & Glass	0.0%	0.00	7.2%	1.85	0.0%	0.00	0.0%	0.00	1.85
Household Appliances	0.0%	0.00	0.4%	0.04	0.0%	0.00	0.5%	0.05	0.09
Audio Visual	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Furniture & Furnishings	0.5%	0.16	3.3%	1.48	0.0%	0.00	0.0%	0.00	1.65
Hardware, DIY & Decorating	0.7%	0.06	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.06
<b>New Cross Retail Park</b>									4.41
Clothing & Footwear	0.0%	0.00	0.5%	0.48	0.0%	0.00	0.0%	0.00	0.48
Chemist & Personal	0.0%	0.00	0.0%	0.34	0.0%	0.00	0.0%	0.00	0.34
Books & Toys & Gifts	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Household Textiles	5.7%	0.34	0.8%	0.07	0.0%	0.00	0.0%	0.00	0.41
Jewellery, China & Glass	0.0%	0.00	1.0%	0.25	0.0%	0.00	0.0%	0.00	0.25
Household Appliances	0.0%	0.00	6.0%	0.57	0.0%	0.00	0.0%	0.00	0.57
Audio Visual	4.4%	0.89	5.5%	1.42	0.0%	0.00	0.0%	0.00	2.31
Furniture & Furnishings	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Hardware, DIY & Decorating	0.5%	0.05	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.05
<b>New Cross District Centre TOTAL</b>		3.79		19.57		0.00		0.58	23.92

Notes:  
 1. Market shares taken from the household survey.  
 2. Turnovers derived from market shares and available expenditure calculated at Table 2c.

Table 10b: Estimated Comparison Goods Turnover at 2024

Store/Centre	Zone								Total £m
	1		2		3		4		
	%	£m	%	£m	%	£m	%	£m	
Sainsbury's Superstore, New Cross Road, New Cross Gate									10.10
Clothing & Footwear	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Chemist & Personal	0.0%	0.31	9.7%	8.94	0.0%	0.00	0.0%	0.00	9.64
Books & Toys & Gifts	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Household Textiles	0.0%	0.03	0.0%	0.07	0.0%	0.00	0.0%	0.00	0.10
Jewellery, China & Glass	0.0%	0.00	1.0%	0.31	0.0%	0.00	0.7%	0.19	0.49
Household Appliances	0.0%	0.00	6.0%	0.70	0.0%	0.00	0.0%	0.00	0.70
Audio Visual	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.6%	0.16	0.16
Furniture & Furnishings	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Hardware, DIY & Decorating	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
<b>New Cross District Centre</b>									13.98
Clothing & Footwear	0.0%	0.00	0.8%	1.05	0.0%	0.00	0.0%	0.00	1.05
Chemist & Personal	4.0%	2.51	5.8%	5.00	0.0%	0.00	0.3%	0.24	7.75
Books & Toys & Gifts	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Household Textiles	0.0%	0.00	6.2%	0.64	0.0%	0.00	0.8%	0.04	0.68
Jewellery, China & Glass	0.0%	0.00	7.2%	2.29	0.0%	0.00	0.0%	0.00	2.29
Household Appliances	0.0%	0.00	0.4%	0.05	0.0%	0.00	0.5%	0.08	0.12
Audio Visual	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Furniture & Furnishings	0.5%	0.20	3.3%	1.83	0.0%	0.00	0.0%	0.00	2.03
Hardware, DIY & Decorating	0.7%	0.08	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.08
<b>New Cross Retail Park</b>									5.45
Clothing & Footwear	0.0%	0.00	0.5%	0.99	0.0%	0.00	0.0%	0.00	0.99
Chemist & Personal	0.0%	0.00	0.0%	0.42	0.0%	0.00	0.0%	0.00	0.42
Books & Toys & Gifts	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Household Textiles	5.7%	0.42	0.8%	0.08	0.0%	0.00	0.0%	0.00	0.51
Jewellery, China & Glass	0.0%	0.00	1.0%	0.31	0.0%	0.00	0.0%	0.00	0.31
Household Appliances	0.0%	0.00	6.0%	0.70	0.0%	0.00	0.0%	0.00	0.70
Audio Visual	4.4%	1.11	5.5%	1.75	0.0%	0.00	0.0%	0.00	2.86
Furniture & Furnishings	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00
Hardware, DIY & Decorating	0.5%	0.06	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.06
<b>New Cross District Centre TOTAL</b>		4.72		24.13		0.00		0.69	29.54

Notes:  
 1. Market shares taken from the household survey.  
 2. Turnovers derived from market shares and available expenditure calculated at Table 2c.

Table 9b: Total Food Turnover at 2024

Store/Centre	Zones				Turnover (£m)	Total Market Share %
	1	2	3	4		
<b>Inside Study Area</b>						
	£m	£m	£m	£m		
Sainsbury's Superstore, New Cross Road, New Cross Gate	4.18	25.73	0.00	4.45	34.36	4.7%
Sainsbury's Local, Lewisham Way, New Cross	0.37	1.12	0.00	0.28	1.78	0.2%
Iceland, New Cross Road, New Cross	0.00	1.53	0.00	0.40	1.93	0.3%
Local Shops, New Cross town centre	0.00	2.44	0.00	0.19	2.63	0.4%
New Cross District Centre 'Other' Sub-total					6.34	0.9%
<b>New Cross District Centre Total</b>					<b>40.70</b>	<b>5.6%</b>
Tesco Extra, Surrey Quays Centre, Redriff Road, Surrey Quays	43.12	12.16	0.00	0.98	56.25	7.8%
Other, Surrey Quays	5.68	0.00	0.00	0.00	5.68	0.8%
Waitrose, New Capital Quay, Greenwich	8.19	3.06	8.91	3.87	24.03	3.3%
Other, Greenwich	0.23	0.00	25.66	2.08	27.97	3.9%
Asda, Thurston Point, Thurston Road, Lewisham	2.90	4.01	0.30	9.85	17.06	2.4%
Aldi, Old Kent Road, Lewisham	2.18	13.11	0.00	5.74	21.04	2.9%
Tesco Superstore, Lewisham Road, Lewisham	3.22	4.06	7.46	19.08	33.81	4.7%
Local shops, Lewisham town centre	5.02	0.73	3.37	3.16	12.29	1.7%
Other, Lewisham	2.46	11.85	6.04	31.66	52.00	7.2%
Lidl, Bestwood Street, Bermondsey	10.39	0.99	0.00	1.56	12.95	1.8%
Iceland, Southwark Park Road, Bermondsey	6.50	0.00	0.00	0.00	6.50	0.9%
Other, Bermondsey	1.66	0.00	0.00	0.00	1.66	0.2%
Local shops, Bermondsey town centre	2.60	0.00	0.00	0.00	2.60	0.4%
Asda, High Street, Deptford	6.45	0.21	0.00	0.21	6.87	0.9%
Iceland, High Street, Deptford	3.46	0.00	0.00	0.43	3.89	0.5%
Local Shops, Bermondsey town centre	2.99	2.63	0.00	0.46	6.08	0.8%
Morrisons, Aylesham Centre, Rye Lane, Peckham	0.23	26.64	0.17	0.00	27.03	3.7%
Lidl, Bellenden Road, Peckham	0.00	8.70	0.00	0.37	9.07	1.3%
Other, Peckham	0.14	16.66	0.38	3.90	21.07	2.9%
Local Shops, Peckham town centre	0.00	8.48	0.00	0.00	8.48	1.2%
Brockley Stores	1.13	2.46	0.38	11.52	15.48	2.1%
Other Stores, Inside Study Area	19.13	6.23	22.26	8.26	55.87	7.7%
Internet	12.82	9.57	16.94	20.84	60.17	8.3%
<b>Subtotal - Inside Study Area</b>					<b>528.55</b>	<b>72.9%</b>
<b>Other Stores Outside of Study Area</b>						
Southwark Stores	6.64	33.13	0.00	1.13	40.90	5.6%
East Dulwich/Dulwich Stores	0.30	22.20	0.00	0.00	22.49	3.1%
Charlton Stores	6.63	0.34	22.16	5.78	34.92	4.8%
Lee Green Stores	0.90	0.00	23.27	11.93	36.10	5.0%
Eltham Stores	0.16	0.00	4.64	1.49	6.30	0.9%
Catford Stores	0.00	0.00	0.00	9.07	9.07	1.3%
Bermondsey (outside) Stores	4.16	0.00	0.00	0.00	4.16	0.6%
Woolwich Stores	0.23	0.00	6.48	0.00	6.70	0.9%
Sydenham Stores	0.00	1.89	0.00	7.52	9.40	1.3%
Others, Outside Study Area	4.59	5.32	6.88	9.55	26.34	3.6%
<b>Subtotal - Outside Study Area</b>					<b>196.38</b>	<b>27.1%</b>
<b>TOTALS</b>	<b>168.65</b>	<b>225.25</b>	<b>155.29</b>	<b>175.76</b>	<b>724.94</b>	<b>100.0%</b>

Notes

1. Total turnover derived from Tables 5b and Table 8b.

**Sainsburys, New Cross Gate**

**Table 11: Total Convenience and Comparison Turnover of the District Centre**

	2019			2024		
	Convenience	Comparison	Total	Convenience	Comparison	Total
Sainsbury's Superstore, New Cross Road, New Cross Gate (excluding GOL sales)	32.08	8.19	40.27	34.36	10.10	44.46
New Cross Gate Retail Park	0.00	4.41	4.41	0.00	5.45	5.45
Other Stores, New Cross/New Cross Gate District Centre	5.92	11.32	17.24	6.34	13.98	20.32
<b>TOTAL New Cross Gate Down centre</b>	<b>38.00</b>	<b>23.92</b>	<b>61.92</b>	<b>40.70</b>	<b>29.54</b>	<b>70.24</b>

**Notes:**

1. Other stores, New Cross/New Cross Gate District Centre includes local convenience stores and local comparison stores.
2. Turnovers taken from Table 9a, 9b, 10a and 10b.



**Sainsburys, New Cross Gate**

**Table 12: Total Turnover of Sainsbury's Store (including Goods Online)**

Sainsbury's Superstore, New Cross Gate	2019			2024		
	Convenience	Comparison	Total	Convenience	Comparison	Total
Existing Sainsbury's Store						
Store Turnover	32.08	8.19	40.27	34.36	10.10	44.46
Goods Online	1.61	0.41	2.02	1.79	0.45	2.23
<b>Total</b>	<b>33.69</b>	<b>8.60</b>	<b>42.29</b>	<b>36.15</b>	<b>10.55</b>	<b>46.70</b>
Proposed Sainsbury's Store, including GOL uplift						
Store Turnover				34.36	14.19	48.55
Goods Online				8.89	2.22	11.12
<b>Total</b>				<b>43.26</b>	<b>16.41</b>	<b>59.67</b>

**Notes:**

1. GOL uplift is estimated based on discussions with Sainsbury's.
2. Comparison goods turnover at 2024 assumes that the new store absorbs 75% of the turnover from New Cross Gate Retail Park.

Sainsburys, New Cross Gate

Table 13: Linked Trips at New Cross/New Cross Gate District Centre

	Existing Store 2019	Proposed Store 2024
Sainsbury's Store turnover per annum (£m)	40.27	49.55
Average spend at Store (£)	37.84	41.70
Estimated transactions per annum	1,064,245	1,164,347
% persons linking trip	14.0%	25.0%
Average number of linked trips to District Centre	148,994	291,087
Average spend during linked trip (£)	21.67	23.88
<b>Value of linked trips to District Centre per annum (£m)</b>	<b>3.23</b>	<b>6.95</b>

Notes

1. Store turnover excludes GOL sales.
2. Average spend at existing store taken from Sainsbury's exit survey data. Average spend at 2024 has been increased in line with retail spend growth projections at Figure 1a Experian RFPBN 16
3. Percentage of persons linking trip is taken from household survey data.
4. It is assumed that there will be an increase in the proportion of Sainsbury's shoppers linking their trip following the improved location of the store.
5. Average spend during linked trip taken from Sainsbury's exit survey data. Average spend at 2024 has been increased in line with retail spend growth projections at Figure 1a Experian RFPBN 16

Table 14: Impact at 2024

New Cross/New Cross Gate District Centre	Scenario A Baseline / No Change	Scenario B Closure of Sainsbury's and NXG Retail Park with No Replacement Store	Scenario C Replacement by Sainsbury's Local	Scenario D Replaced by the New Sainsbury's Store
<b>Convenience (£m)</b>				
New Cross 'Other' Convenience Facilities	6.34	6.34	6.34	6.34
Existing Sainsbury's Store (with existing GOL sales)	36.15	CLOSED		CLOSED
Existing linked trips	3.23			
Proposed new Sainsbury's Store (with increased GOL sales)				43.26
Linked trips uplift				6.95
Small Format Sainsbury's Local			3.04	
<b>Comparison (£m)</b>				
New Cross 'Other' Comparison Facilities (excluding SSL & NXG Retail Park)	13.98	13.98	13.98	13.98
Existing Sainsbury's Store (with existing GOL sales)	10.55	CLOSED	CLOSED	CLOSED
Proposed Sainsbury's Store (with proposed GOL sales)				16.41
New Cross Retail Park	5.45	CLOSED	CLOSED	CLOSED
<b>TOTAL (£m)</b>	<b>75.70</b>	<b>20.32</b>	<b>23.36</b>	<b>86.94</b>
<b>CHANGE IN TURNOVER</b>		<b>-66.38</b>	<b>-52.34</b>	<b>11.24</b>
<b>IMPACT COMPARED TO BASE (%)</b>		<b>-73.2%</b>	<b>-69.1%</b>	<b>14.9%</b>

Notes:

1. Proposed development scenario - assume Sainsbury's takes same turnover as existing store (projected to 2024).
2. Proposed Sainsbury's Store comparison turnover assumes 75% of New Cross Gate Retail Park turnover will be transferred to the new Sainsbury's store.
3. Sainsbury's Local store turnover is based on company averages (£10,710)\*280sqm, allowing for increases in floorspace efficiency to 2024.







# MEMORANDUM

Date: 2019-12-11

Project No: 495C

Office: DSP-L

**TO:** Mike Valmas, Mount Anvil  
**FROM:** Andreas Feiersinger, Dr Sauer & Partners  
**PROJECT:** Bakerloo line extension  
**SUBJECT:** Review of tunnelling aspects presented in TfL's public consultation documents with a focus on New Cross Gate

**REFERENCE:** [1] New Civil Engineer, Tunnelling | Northern line extension, 17<sup>th</sup> March 2017.  
[2] Transport for London, Bakerloo line extension, Tunnelling Worksite Summary Report, October 2019.  
[3] Transport for London, Bakerloo line extension, Factsheet 6, New Cross Gate station and tunnelling worksite.  
[4] Transport for London, Bakerloo line extension, Factsheet 9, Wearside Road Council depot.  
[5] Conference call with the Developer and consultants, 25<sup>th</sup> November 2019.  
[6] Intermodality, Technical note, Bakerloo line extension: Rail-linked sites for BLE construction, 25<sup>th</sup> November 2019.  
[7] Conference call with the Developer and consultants, 5<sup>th</sup> December 2019.

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## INTRODUCTION AND PURPOSE

Transport for London (TfL) is currently consulting the public on the Bakerloo line extension (BLE) from Lambeth North to Lewisham.

The documents on the public consultation website confirm the plan to use the New Cross Gate (NXG) retail park as proposed primary tunnelling worksite and for construction of a new station (references [2], [3] and [4]).

Dr Sauer & Partners (DSP) was contracted by Mount Anvil to provide tunnelling consultancy services regarding TfL's plans on how to use the NXG retail park site during BLE construction.

DSP reviewed the tunnelling related information available on TfL's BLE consultation website as well as information from similar London projects such as the Northern line extension and Crossrail 1 and 2.

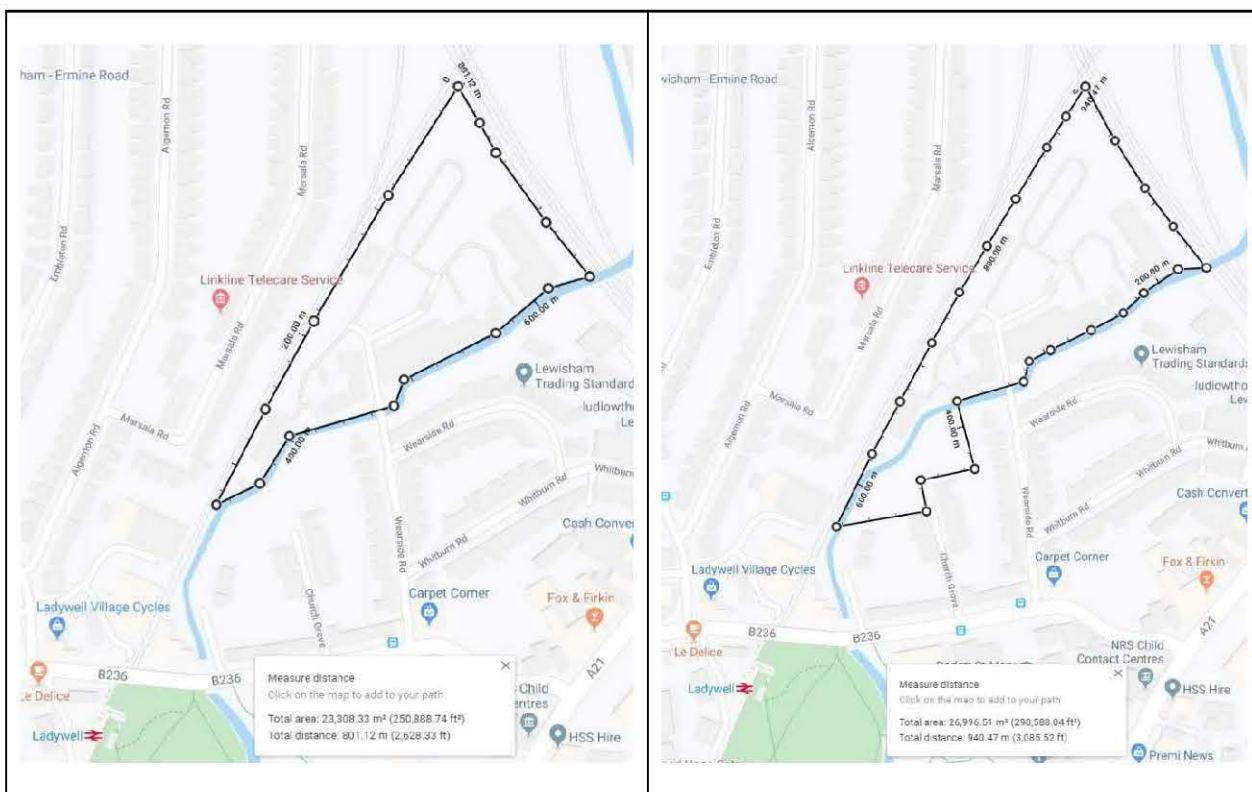
This memorandum provides considerations from a tunnel engineering perspective. It assesses alternative primary tunnelling worksites to the one proposed by TfL and provides comments on the wider scheme.

# MEMORANDUM

## ALTERNATIVE PRIMARY TUNNELLING WORKSITES

### Wearside Road Council depot

TfL didn't consider the Wearside Road Council depot site in the primary tunnelling worksite option assessment presented in reference [2]. This site was regarded as not large enough to accommodate a primary tunnelling worksite. TfL assessed a minimum footprint of more than 24,000 m<sup>2</sup> for a primary tunnelling worksite.



**Figure 1** Wearside Road Council depot footprint measured from Google maps: Area presented by TfL on the left (approx. 23,300 m<sup>2</sup>) and slightly increased assuming more land to the south following a Google maps satellite view investigation on the right (approx. 27,000 m<sup>2</sup>)

It is unclear considering Figure 1 why TfL has not considered the Wearside Road Council depot as primary tunnelling worksite. The currently proposed footprint as well as an assumed slightly larger footprint are in the same order of magnitude to what TfL presented as the requirement.

The Wearside Road Council depot site has the potential for more trains removing spoil and delivering construction materials compared to the NXG site (refer to reference [6]). The availability of more trains means a smaller construction site footprint will be required compared to the NXG site. This is because more trains will lead to less site footprint required for spoil stockpiling and for the storage of tunnel lining segments.

TfL's tunnelling worksite summary report (reference [2]) indicates that two tunnel boring machines (TBM's) will be assembled and launched at NXG and will be driven to the Wearside Road Council depot

# MEMORANDUM

(see Figure 2, orange line). The TBM's will then be disassembled at Wearside Road Council depot, taken to NXG, reassembled and relaunched for the second drive to Old Kent Road I (see Figure 2, red line). This will be a linear process and TBM assembly will take approximately three months per site. The assembly of the same TBM's twice (i.e. initially at NXG in direction east and then in direction west) will take approximately six months. TBM disassembly will take approximately one month per site.

Alternatively driving both TBM's directly from the Wearside Road Council depot to Old Kent Road I (OKR I) would save approximately four months on the TBM construction programme. That is one month of TBM disassembly at Wearside Road Council depot and three months of TBM reassembly at NXG before relaunch of the TBM's for the second drive.

It can be concluded that the programme advantages of TfL's presented TBM strategy will not be significant compared to alternatives. TfL considered the use of four TBM's (i.e. 2 No. for the tunnels between OKR I and Lambeth North and 2 No. for the tunnels between OKR I and Wearside Road Council depot) and the use of NXG as the primary tunnelling worksite.

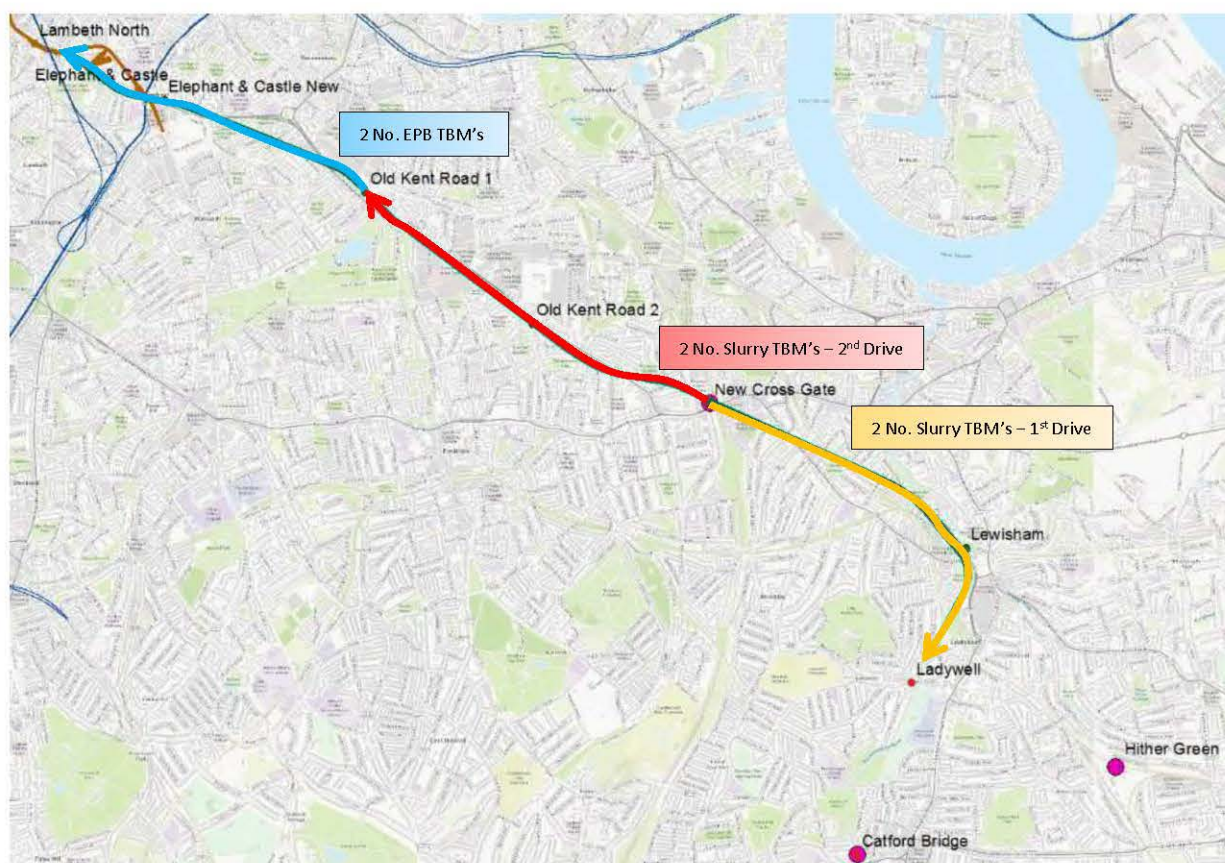


Figure 2 TBM drives included on figure extracted from reference [2]: Route of the tunnelled extension showing the considered primary tunnelling worksites

Two TBM's operating simultaneously would create a spoil volume of approximately 1,700 m<sup>3</sup> per day. This assumes a TBM diameter of 5.2 m (assumed from reference [1]), an advance rate of 20 meters per day and a bulk factor of 2. It will need to be assessed by the rail transport consultants how any primary tunnelling worksite responds to this volume and how different sites compare on performance.



# MEMORANDUM

It is to be noted that different rolling stock will be required for spoil removal and for the delivery of tunnel lining segments.

## Hither Green

A primary tunnelling worksite at Hither Green does not seem to have benefits over TfL's proposed worksite at NXG or the viable alternative at Wearside Road Council depot from a tunnel engineering perspective.

Approximately 3.2 km of extra tunnels will be required resulting in a large amount of spoil and construction materials required in addition. The extra tunnels will adversely impact the construction programme and Hither Green won't allow for synergies with other BLE works.

## General comments on TfL's presented worksites

It is not clear why TfL does not present OKR I as primary tunnelling worksite. Two TBM's will be launched and two received at this location (see Figure 2). It is assumed that this is due to the missing access to the rail network which is one of the presented core requirements.

The amount of construction required at OKR I will be comparable to the amount of construction required at TfL's 'primary tunnelling worksite'. It is understood that OKR I will also be a primary tunnelling worksite and TfL should classify it as such.

It is understood that more than one worksite could be classified as 'primary tunnelling worksite'. It would be sensible to use OKR I and Wearside Road Council depot as primary tunnelling worksites. A primary tunnelling worksite at NXG would be located relatively close to the OKR I worksite and would hence be less advantageous than a worksite at Wearside Road Council depot.

TfL's tunnelling worksite summary report highlights the importance of spoil removal and construction materials delivery via rail network. It further highlights the importance of the construction programme to the BLE. However, an approximate calculation indicates that 40 % of spoil will be removed via rail network and 60 % via road network which is unlikely to be acceptable for the community in the area. This assumes tunnels and stations start at the same time for programme reasons, which then requires the removal of spoil from all five stations as well as from both TBM's driving from OKR I to Lambeth North via road network. Station dimensions were assumed to be 140 m x 30 m x 25 m (see also reference [1], Nine Elms station) and the diameter of the tunnels was assumed to be 5.2 m (in line with reference [1], Northern line extension).

It is to be noted that TfL didn't make a more detailed construction programme available which could be reviewed and commented on. TfL's tunnelling worksite summary report repeatedly refers to the programme criticality of the tunnel fit-out stage. This can only be evaluated in context considering the overall BLE construction programme including enabling works, construction of tunnels and stations, fit-out of tunnels and stations, integration with the existing Bakerloo line, testing and commissioning.



# **Sainsbury's & Mount Anvil: New Cross Gate**

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**Proposed Bakerloo Line Extension  
Review of proposed work sites for construction: rail accessibility**

12<sup>th</sup> December 2019

## Document history

Date	Version	Issued to	Quantity	Format	Approved
12/12/2019	1	Client / project team	1	PDF	NTG

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# 1 Introduction

## 1.1 Introduction

- 1.1.1 Transport for London (TfL) is currently consulting the public on the Bakerloo line extension (BLE) from Lambeth North to Lewisham. The documents on the public consultation website confirm the plan to use the New Cross Gate (NXG) retail park as the proposed primary tunnelling worksite and for construction of a new station.
- 1.1.2 Intermodality (IMT) has been retained by Mount Anvil to provide rail transport consultancy services regarding TfL's plans to use the NXG retail park site during BLE construction.
- 1.1.3 This summary report provides considerations from a rail transport perspective. It assesses worksite options proposed by TfL and provides comments on the assessment process.

## 1.2 Overview

- 1.2.1 TfL confirms in its latest report on tunnelling worksites<sup>1</sup> that tunnelling would extend down as far as Wearside Road Council depot (section 3.3.1), and that rail transport would be used to support the tunnelling works, with multiple trains per day, each around 300m in length, operating off at least 2 sidings (section 4.1.6).
- 1.2.2 Like the Northern Line Extension (NLE), the BLE would continue with the same 5.2m-diameter twin running tunnels constructed between Elephant & Castle and Lewisham. Using the NLE quantities as a guide, the following high-level comparison can be made between the two:

**Table 1 Comparison of main construction quantities**

	Northern Line Extension	Bakerloo Line Extension
Length of route (km)	3.2	8.5
Spoil excavated from tunnels (tonnes)	300,000	800,000
Tunnel lining segments imported	20,000	53,000

- 1.2.3 Using a 300m length train for comparative purposes (21 wagons @ 76 tonnes payload = 1600 tonnes), a daily 25m average drive by 4 x TBMs might produce the equivalent of 4,800 tonnes of spoil or up to 3 trainloads per day, subject to the level of residual spoil remaining following treatment of slurry.

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<sup>1</sup> Bakerloo line extension: Tunnelling Worksite Summary Report, TfL October 2019

## 2 Worksites

### 2.1 New Cross Gate

- 2.1.1 TfL's promotion of the Sainsbury's site at NXG is in part due to the suggestion that there is an existing siding to the north of the site (Page 16). This is designated by Network Rail (NR) as the "Up Sussex Loop" (USL) and is used by NR maintenance engineers for loading and unloading rail-mounted plant on and off the main line (known as a Road Rail Access Point or RRAP). NR operates a maintenance engineering compound alongside. The Figures below show the USL and adjacent land uses.

**Figure 1 Up Sussex Loop (left) looking from NXG towards London Bridge**



**Figure 2 Up Sussex Loop and NR maintenance compound (NXG to left, London Bridge to right)**



- 2.1.2 The USL offers around 300m of usable length, electrified with DC third-rail power supply and signalled for bi-directional working. The only practical route for freight trains would be to and from the south and the signalling would allow for this. However, the route through NXG has not carried commercial freight traffic for many years and does not form part of Network Rail's Strategic Freight Network (SFN)<sup>2</sup>. Therefore, there is no strategic or daily provision in the timetable for freight trains to operate.
- 2.1.3 However, the East London Line track formation and overbridge structure, combined with the raised level of the Network Rail main line relative to the adjacent Cold Blow Lane, significantly constrains available space. Constructing multiple sidings within the Network Rail maintenance compound would at best achieve no more than 130m in length and further reduce space for storage and handling of material. Any attempt to link the USL back to the NXG works site would either require an at-grade crossing of the Up East London Line, or require new sidings to be laid on the formation of the existing road access into the Network Rail compound, effectively sterilising the maintenance compound site. Alternatively, a new connection would be required from the main line at NXG into the main works site, in which case any suggestion that the NXG site somehow benefits from an existing siding would be baseless.
- 2.1.4 In terms of pathing, the Mayor has expressed concern about the impact of freight trains on passenger services on the South London Network. During the 2018 Appeal on the proposed Strategic Rail Freight Interchange at Howbury Park in Bexley (situated on a core SFN route), the Mayor challenged IMT's assertions regarding the availability of capacity on the local rail network, stating:

"7.4.54. The reality is that the passenger timetable has shown enduring stability. Recent changes are the exception to a period of great stability. The recent changes associated with Thameslink altered the destinations of trains rather than their slots (e.g. Thameslink trains now running through to Rainham). The reality is that this is a heavily congested area of London – described by Mr Goldney in his oral evidence as 'South London's tube'. There is very little slack in the system throughout the day. As Mr Goldney explained in re-examination on 17 September 2018, there is inter-dependency of services based on 'decades of refinement'. Furthermore, he maintained that the restrictions which exist in the current timetable are a good proxy for the constraints that will exist in any future timetable. The complexity of making alterations stems from very constrained junctions, rolling stock constraints, congestion at critical junctions (for example Lewisham) and the demands at the London termini. The time taken in manoeuvring a slow and long freight train across multiple junctions during the day creates the need for gaps in services which will disrupt the rhythm of the passenger timetable even if all goes well.... If things go wrong, then the delays that will ensue will be significant given the difficulties lack of flexibility in the network."<sup>3</sup>

- 2.1.5 Noting the Mayor's concerns about the lack of network capacity and impact that additional freight traffic would have on it (which the Inspector and Secretary of State acknowledged in rejecting the Appeal), NXG has a very high level of traffic every day across the four main line tracks running between Norwood Junction and London Bridge, as well as the two East London Line main line tracks between NXG and Dalston.

<sup>2</sup> National Policy Statement on National Networks, DfT 2014, Annex C

<sup>3</sup> Land adjacent to the Southeastern Train Depot, Moat Lane, Slade Green, Erith APP/D5120/W/17/3184205 APP/T2215/W/17/3184206: Report to the Secretary of State for Housing, Communities and Local Government by I Jenkins BSc CEng MICE MCIWEM 4 February 2019



- 2.1.6 Network Rail's Working Timetable (WTT) shows over 1,000 separate train movements through NXG station on a weekday. In addition, Network Rail's Engineering Access Statement (EAS) indicates that the line may be blocked Tuesday to Saturday between 01:15 and 05:00 for engineering works to take place.<sup>4</sup>
- 2.1.7 Given the length of time needed to bring a freight train into the USL (or direct into the NCG site itself) from the south via the adjacent Up Slow main line track (timing of freight train movements on, off and across the south London network was discussed at length in the Howbury Park SRFI Inspector's report), the only available windows for such a movement would be between midnight and 06:00, noting that the route can be closed on weekday nights between 01:15 and 05:00 for maintenance.
- 2.1.8 Outbound freight trains from the USL would have to run south and cross 3 of the 4 main line tracks at grade (Up Slow, Up Fast, Down Fast) to reach the Down Slow, via a ladder of 15mph crossovers north of NXG<sup>5</sup>. Allowing for the additional time needed to make this crossing manoeuvre, the only period when a sufficiently large window would exist across all 4 main line tracks would again fall within overnight engineering possessions.
- 2.1.9 This suggests that the site could only accept freight trains on and off the main line in the middle of the night, unless other train services were retimed during the day to allow this. As the Mayor objected to similar proposals for the Howbury Park SRFI scheme to require retiming (or "flexing") of passenger trains to accommodate additional freight trains, it is presumed that the Mayor would not wish to see this occur at NXG either. This also presumes that paths could then be found from NXG through to suitable destinations for spoil disposal / loading of inbound materials in and around the overnight engineering possessions in the immediate area.

## **2.2 Wearside**

- 2.2.1 The available land at Wearside (Figure overleaf) extends to 2.44 Hectares, above the minimum 2.4 Hectare footprint identified by TfL (para 4.1.10) for a primary worksite. TfL state that the site would not be large enough to be used in this way (para 8.1.2) and give the site no consideration beyond recovery of the TBMs, which we presume would necessitate relocation of the existing Council depot in order to accommodate this.
- 2.2.2 The Wearside site lies adjacent to the double-track branch line from Lewisham to Hayes and has around 375m of frontage onto the main line (Figure overleaf). As there are no sidings into the site, a new main line connection would be required into the site from the adjacent Down Mid Kent line, allowing trains of up to 275m to arrive from the north, propel (reverse) in and depart to the south. A solution allowing freight trains access to and from the south would then, in turn, facilitate direct rail access from the BLE south to Hayes, for maintenance and/or for passenger trains (The TfL report is silent on whether the BLE would include provision for rail access to the Hayes branch).
- 2.2.3 In contrast to NXG, the Hayes branch currently handles a much lower level of rail services, with 152 trains per day between 05:30 and 00:46 and without the significant overnight engineering access restrictions. Onward connectivity to the south via Beckenham Junction would provide onward access to the wider rail network.

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<sup>4</sup> Timetable Planning Rules, Engineering Access Statement 2020, Section 5, South East Route

<sup>5</sup> Any freight trains departing directly from the NXG worksite itself would still have to use the USL as there are no equivalent main line crossovers or bi-directional signalling available south of NXG station to allow a direct departure from the NXG worksite in the southbound direction

**Figure 3 Wearside site (Hayes to left, Lewisham to right)**



## **2.3 Hither Green**

- 2.3.1 The site is an established facility for rail freight services to and from North Kent (see Figure below), with extensive railway land (14 Hectares within the redline below) capable of being configured to support BLE construction activity.

**Figure 4 Hither Green (Lewisham to left, Sevenoaks to right)**



- 2.3.2 Hither Green is on a core route of the SFN, the timetable having scheduled paths for freight trains as well as “strategic” paths held for future growth in traffic, eg between the Channel Tunnel, the Isle of Grain, Northfleet Embankment and London. The site, which includes 5 full-length stabling sidings for freight trains accessible from either direction of travel, would therefore be significantly easier to achieve paths than for NXG

## **2.4 TfL site comparison**

- 2.4.1 The following comments are made on TfL’s site comparison exercise:

### ***New Cross Gate***

- 2.4.2 Access to Network Rail: the assessment says “Yes” and does not indicate how / where multiple sidings would be achieved on site. In para 7.2.5 TfL suggests that “*there is rail access adjacent to the site and suitable sidings could be built here to deliver and remove materials and spoil from the site*” but again does not indicate whether the USL would be used and/or new sidings constructed within the site;

- 2.4.3 Environmental and Planning Policy considerations: the assessment is silent on the loss of existing rail sidings / maintenance facility (as noted against the Hither Green site);

### **Hither Green**

- 2.4.4 Access to Network Rail: the assessment says “Yes; two reduced length sidings possible. Requires use of additional land at Grove Park Sidings and larger number of train movements.” In para 7.3.5 TfL suggests that “the sidings identified as most suitable for use on this site are relatively short and we would also need to use Grove Park sidings to receive longer trains. The need to undertake train movements at a higher frequency due to the shorter sidings, would be less efficient compared to the alternative sites.” This is based on an overly-restrictive definition of the available land, using only the northern end of the area shown in Figure 4 above. If the whole area shown in Figure 4 is included TfL’s statements here would not be correct.

## **2.5 Conclusions**

- 2.5.1 The recent TfL document makes no reference to the very clear position adopted by the Mayor with regard to the lack of capacity on the south London rail network and the implications for passenger services. The adherence to the NXG site as the main works site for the BLE, and the suggestion that multiple trains will be generated per day, at the point where TfL’s East London Line and Network Rail’s main line networks converge with over 1,000 train movements per day, runs counter to the Mayor’s stated position that:
- The reality is that this is a heavily congested area of London;
  - There is very little slack in the system throughout the day;
  - The restrictions which exist in the current timetable are a good proxy for the constraints that will exist in any future timetable;
  - The complexity of making alterations stems from very constrained junctions, rolling stock constraints, congestion at critical junctions (for example Lewisham) and the demands at the London termini;
  - The time taken in manoeuvring a slow and long freight train across multiple junctions during the day creates the need for gaps in services which will disrupt the rhythm of the passenger timetable, even if all goes well;
  - If things go wrong, then the delays that will ensue will be significant given the difficulties lack of flexibility in the network.
- 2.5.2 Routing of multiple freight trains amongst 1,000 other passenger services, across a series of 15mph junctions, should be considered in the context of the Mayor’s stated position. In practice, freight trains (and the associated noise of such movements) would be restricted to arriving and departing from site at night – assuming that Network Rail can then suspend vital overnight engineering work (and lose a local maintenance base and access point) for the duration of the construction and fit-out works.
- 2.5.3 It is also unclear the extent to which Network Rail has been engaged by TfL on the specific topic of freight train movements to and from NXG. At the time of writing we have yet to find a Network Rail contact in the Freight & National Passenger Operators Route (FNPO) or System Operator that is aware of the proposals.

- 2.5.4 TfL has therefore yet to provide a sufficiently compelling or transparent assessment of the various proposed worksite options, with continued silence about the comparative costs of acquiring the various sites, or the potential disposal proceeds following completion of the BLE project. The latest report raises a number of critical unanswered questions relevant to the deliverability of the proposals around the preferred primary worksite at NXG, including:
- a) Does TfL agree with the Mayor's position on south London rail network capacity as stated above;
  - b) Does the Up Sussex Loop have sufficient clearance from the main line for it to be used for loading and unloading of bulk materials without compromising passenger trains on the adjacent Up Slow line;
  - c) How would the presence of third-rail affect its use for loading and unloading of materials;
  - d) Can multiple sidings be achieved in this location;
  - e) Were the USL to be used for construction traffic, how far would this interfere with Network Rail's engineering access to the main line via the RRAP, where would replacement facilities be provided, and why was the impact not noted in the comparative assessment;
  - f) Is Network Rail confident that sufficient paths can be found in the timetable to accommodate multiple freight trains per day within the constraints of the existing timetable and overnight engineering access;
  - g) How many of the freight trains would have to operate to and from the site at night (ie 19:00 – 07:00) and how far would any existing services or engineering access arrangements have to be altered as a consequence;
  - h) Why was the Hither Green site assessment so narrowly defined;
  - i) Why was the Wearside site so swiftly dismissed when the BLE plans will still require its use as the southern terminus for the tunnelling works.

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# Appendix 2

Friday, 20<sup>th</sup> December 2019  
By email only

Dear Sir or Madam,  
**RE: Bakerloo Line Extension (BLE) consultation**

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## 1. Introduction

- 1.1. Sainsbury's Supermarkets Ltd (SSL), Mount Anvil and A2Dominion (referred to hereafter as 'the developers') make this submission in response to the current consultation (14 October - 22 December 2019) in respect of the proposed Bakerloo Line Extension (BLE).
- 1.2. Sainsbury's own the existing Sainsbury's store and petrol filling station, together with a retail terrace currently occupied by Harveys Furniture, TK Maxx, and Dreams; and associated car parking on land north of New Cross Road at New Cross Gate. This site provides significant employment for local people and it is essential for the vitality and viability of the New Cross/New Cross Gate District Centre.
- 1.3. Through their ongoing engagement in the consultation process for the proposed BLE, the developers have reiterated their support in principle for the BLE, provided the business case is proven. However, the developers strongly object to the Sainsbury's site (described as 'New Cross Gate Retail Park') being identified as a tunnelling worksite and the site's selection as the location for New Cross Gate Station. These selections will have significant and unacceptable consequences for: the existing Sainsbury's store; its employees and the community which it serves; the developers' regeneration proposals for the site; and the wider New Cross/New Cross Gate District Centre.
- 1.4. At this stage, the developers would like clarification as to how Transport for London (TfL) is dealing with the significant issues raised by the developers during the first consultation response. TfL has so far failed to provide an adequate response to the developers' objections.
- 1.5. The developers submitted a planning application to Lewisham Council for development at their New Cross Gate store consisting of 1,161 homes across two phases, as well as a replacement supermarket, commercial space, placemaking and infrastructure. The planning application was submitted in October 2019.
- 1.6. This application confirms the commitment of the developers to delivering new housing and investment in the short term. This investment will not happen if the current BLE proposals for a new station and tunnelling worksite at New Cross Gate Retail Park are confirmed. It is within this context that this consultation response is submitted.
- 1.7. As a substantial and highly accessible site (it has a PTAL rating of 6), New Cross Gate Retail Park offers a valuable regeneration opportunity with excellent potential for contributing to the delivery of much-needed high quality housing, as recognised in the Lewisham Site Allocations Plan. The developers' proposals will deliver significant beneficial development and investment which will be lost should the site be acquired for BLE works.
- 1.8. The developers have reviewed the published consultation information and supporting evidence with respect to their interests in the area. As set out in the previous consultation responses (dated April 2017 and December 2018), the developers object to locating the new station at New Cross Gate Retail Park; and the use of the site for a tunnel launching and works site. This objection is supported by a series of technical reports including:
  - A Socio-economic Assessment, prepared by WSP | Indigo;
  - A Retail Impact Assessment, prepared by WSP | Indigo;
  - Tunnel engineering advice provided by Dr Sauer and Partners; and
  - A Transport Appraisal prepared by Intermodality.

## 2. Bakerloo Line Extension Consultation 2019

- 2.1. The current consultation runs from 14 October until 22 December 2019. The developers have actively engaged with the previous consultations but TfL have not sought to adequately address the significant issues raised.
- 2.2. The key issues which TfL are currently consulting on are as follows:
- A new integrated station entrance at Elephant & Castle;
  - The route of the proposed tunnels from Lambeth North to Elephant & Castle;
  - The route of the proposed tunnels from Elephant & Castle to Lewisham;
  - The location of the primary and secondary tunnelling worksites for the scheme;
  - The naming of the two proposed stations on Old Kent Road; and
  - A possible further extension of the route from Lewisham to Hayes and Beckenham Junction, involving a conversion of the National Rail line.
- 2.3. It appears that the location of New Cross Gate station is not the subject of this consultation as the location of stations has been decided as a result of the earlier consultations. The letter from Chris Porter of TfL, dated 21 November 2019 (which is provided at **Appendix 1**), states that the proposed location on Sainsbury's land at New Cross Gate is the only "practical option".
- 2.4. However, TfL's letter goes on to state that TfL welcome feedback on "any" aspect of the proposals. In short, although it appears a selection has been made about the location of the New Cross Gate station, the current consultation provides the opportunity to comment again on this matter. It remains to be seen, however, whether TfL are genuinely consulting on this matter.
- 2.5. The developers are concerned over the robustness of previous consultations carried out by TfL and the lack of consideration given to the genuine and serious concerns raised by the developers to date. Indeed, it is unacceptable that the location of the New Cross Gate station is explicitly included in the public consultation where for the first time TfL acknowledge that the store will have to close as a result of the BLE proposals. In previous public consultations, TfL indicated that the store could continue to trade. The developers are firmly of the view that the previous consultation responses were made based on misleading and incomplete information which failed to fully convey the impact of the new station being located at New Cross Gate Retail Park. As a result, the responses received as part of this consultation are misleading and do not reflect the wider concerns about the permanent closure of the Sainsbury's store.
- 2.6. This objection uses the online survey questions to frame the responses to these matters.
1. **Please let us have any comments about our proposals, including how these may impact you whether in a positive or negative way.**
- 2.7. The developers are concerned that TfL is seeking to promote another major capital-intensive and disruptive infrastructure project, when no evidence has been provided to demonstrate a robust and transparent business case. The developers have repeatedly asked for information about overall development costs, including the costs of land acquisition and the wider socio-economic impacts on the community and New Cross/New Cross Gate District Centre, but TfL remains unwilling to discuss or disclose this.
- 2.8. Given that HS2 and Crossrail 1 are both significantly over budget and behind schedule, and Crossrail 2 remains under review it is difficult to understand why TfL continues to press ahead with the BLE without there being clear evidence of a business case. Indeed, now it is

acknowledged that the Sainsbury's store will be forced to close, the effect this will have on the 'business case' should be open to scrutiny. In short, the project should be halted until the business case is proven.

- 2.9. Notwithstanding this overarching concern with the overall project, the Stations Overview consultation document confirms that TfL are proposing a new station at New Cross Gate Retail Park. It goes on to confirm that:

*"At the last consultation we stated that there could be a potential loss of the Sainsbury's supermarket during the construction period. As we have developed our plans for the site to incorporate the primary tunnelling worksite, it has become clearer that the current supermarket, other retailers and petrol station would not be able to remain operational on the site during construction."*

- 2.10. Therefore, the businesses at New Cross Gate Retail Park will be forced to close. This will have a significant negative impact on Sainsbury's business, the people currently employed on the site, regeneration of the area in the short term and the impact on the wider community and New Cross/New Cross Gate District Centre.

- 2.11. In the light of this, the developers object to:

- The location of New Cross Gate Station; and
- The use of the site as a tunnelling worksite from which tunnel boring machines will be launched.

- 2.12. We deal with each of these in turn.

#### **The Location of New Cross Gate Station**

- 2.13. The October 2019 Consultation does not explicitly ask for further views on the location of the proposed station location at New Cross Gate.

- 2.14. Factsheet 6: New Cross Gate Station and tunnelling worksite states:

*"We have further developed our proposals for the New Cross Gate station and concluded that the location identified in 2017 remains the proposed location for the station at New Cross Gate."*

- 2.15. The developers have requested evidence that justified TfL reaching this conclusion, but it has not been forthcoming.

- 2.16. The October 2019 Consultation Background to Consultation Summary Report states at paragraph 5.4.2 that, in respect of the selection of the New Cross Gate Retail Park site:

*"The site has been selected for the New Cross Gate station because of its size, location and access from the A2. These factors would enable a station to be constructed at least impact, risk, complexity and cost."*

- 2.17. TfL wrote to SSL on 14 October 2019 (see **Appendix 2**) confirming that:

*"We have now completed our review of the 2017 consultation feedback and your own responses and can confirm that those initial findings are unchanged. Accordingly, the Sainsbury's Retail Park is now the proposed and selected location for the construction and operation of a new London Underground station and interchange with the East London Line at New Cross Gate as part of the BLE. We have concluded that our proposal is the only practical option."*

- 2.18. However, in their letter of 21 November 2019 (**Appendix 1**) TfL state:

*“As part of the current consultation an opportunity has been provided for respondents to comments on any aspect of our proposals for the extension (Question 1) alongside specific questions about the new aspects of the proposals, including our plans to locate a tunnelling worksite at New Cross Gate, (Question 5).... We welcome public and stakeholder feedback regarding potential impacts of our proposals, so that we can understand these and begin to work on mitigations as we progress our design.”*

2.19. Since the station locations, including New Cross Gate, have been “selected”, station locations are not amongst the list of ‘key issues’ that are being consulted on within the main consultation documents for the current consultation.

2.20. Therefore, it is not clear what views TfL are genuinely seeking in respect of the station locations at this stage.

2.21. The choice of New Cross Gate Retail Park is referred to in the Stations Overview consultation document as follows:

*“In the 2017 consultation we consulted on our proposed site for the station being the site of the retail park lying on the west side of the existing New Cross Gate Rail station. A majority of respondents expressed support for this proposal.”*

2.22. We can find no further or fuller explanation as to why New Cross Gate Retail Park has been chosen. There does not appear to be any strategic environmental assessment (SEA) or any in-depth evidence based analysis, including a cost/benefit analysis to justify this selection.

2.23. Furthermore, it is misleading to state that a majority of respondents expressed support for the proposal. In July 2017, TfL published a Consultation Report which summarised the responses received as part of the public consultation which took place between 9 February and 21 April 2017. “Question 8” of the public consultation asked:

*“Do you have any comments on the site we are considering for the location of a new Underground station at New Cross Gate?”*

2.24. The consultation report summarises the comments received in respect of Question 8 as follows:

*“The majority of responses to this question expressed support for the proposed site either generally (52.3 per cent) or more specifically because of the interchange it would offer with Overground and National Rail services (4.1 per 6 cent). 6.5 per cent of responses referred to the need for seamless pedestrian interchange between the two stations without having to exit the station.*

*The impact on the existing retail at the site was the theme of 11.3 per cent of responses. 8.9 per cent of all responses referred to the desire to retain access to Sainsbury’s. These responses include concern about the permanent loss of Sainsbury’s (2.3 per cent); concern about the temporary loss of Sainsbury’s (1.9 per cent); and opposition to the site location because it removes Sainsbury’s (1.8 per cent).”*

2.25. Table 8 of the July 2017 consultation report sets out numerically, a summary of the different views included in the responses received. The table states that 1,073 (52.3%) of the respondents supported the proposals. This is hardly a ringing endorsement. Clearly, a substantial number of respondents (including, importantly, the landowners, Sainsbury’s) did not support the proposal.

- 2.26. Indeed, it is unclear whether respondents supported the proposals in principle, without understanding fully the implications of having the new station at New Cross Gate Retail Park, including the impact on the Sainsbury's store. Given this ambiguity it is evident that TfL cannot draw strong conclusions from previous consultation results.
- 2.27. The July 2017 consultation was carried out and responded to on the basis that the Sainsbury's store would continue to trade, albeit with the "potential loss" of the store "during the construction period". This position has now changed and TfL acknowledge that the Sainsbury's store will have to close.
- 2.28. A fuller review of the previous consultation comments indicates that 20% of respondents expressly opposed the station being located at New Cross Gate Retail Park mainly because it could cause Sainsbury's to close (even temporarily). This is a significant number of objectors. Had TfL made the public aware that the Sainsbury's store would be closing permanently and that there are no plans to replace it, then the opposition to the station being located at New Cross Gate Retail Park would, almost certainly, have been a lot higher. TfL's justification of locating the station at New Cross Gate Retail Park does not stand up to scrutiny when it is clear that the public were misled about the true impact of the proposals.
- 2.29. Given the strong opposition to Sainsbury's closing and the recognition that Sainsbury's will be forced to close should the New Cross Gate Retail Park be chosen as a station (and/or tunnelling location – see below), for transparency and fairness, TfL must re-consult on the station location options, providing the full facts to get a true understanding of what preference is of the public and stakeholders.
- 2.30. Indeed, the current consultation information is misleading. The map showing the site of the New Cross Gate station in the Stations Overview document and Factsheet 6 shows the Sainsbury's store and car park in place. Many people will look at this and assume that Sainsbury's will continue to trade because this was what was implied previously. The maps must be updated to show that Sainsbury's will be gone when the station is developed.
- 2.31. Finally, the current consultation does not provide any information on how the buses which currently use the Sainsbury's site would be relocated during the construction period of the station. This is a matter about which local people will want to be informed.

### **The Proposed Tunnelling Worksite at New Cross Gate**

- 2.32. The developers have serious concerns about the validity and transparency of the consultation process. There has not been an objective and transparent assessment of the tunnelling worksite location alternatives. It seems clear that the New Cross Gate Retail Park has been chosen as the preferred location and the size criteria chosen to rule out the Wearside Road Depot and Hither Green.
- 2.33. Previously, TfL has stated that the minimum site for a primary worksite should be 2.4 hectares, and that the Wearside Road Depot site will be needed in any case for tunnel boring machine (TBM) recovery, but in the current consultation any prospect of the Wearside Road Depot being considered for a primary tunnelling worksite is dismissed, even though the available land is over 2.4 hectares.
- 2.34. The boundary line for the Wearside Road Depot site (and for the Hither Green site) has been drawn artificially smaller than the available land, which we can only presume is to ensure that it falls below the arbitrary 2.4 hectare threshold. Indeed, the arbitrary 2.4 hectares does not reflect the size of the various worksites achieved for Crossrail 1 and the Northern Line Extension (NLE). If TfL did not consider New Cross Gate to be such a windfall opportunity, it would find a way of making the Wearside Road Depot site work. In addition, the use of the Wearside Road Depot as a TBM launch site supports the provision of a permanent heavy rail link to Hayes in this location.
- 2.35. We comment further on this in respect of Question 5(a).

2.36. Consultation Factsheet 6 states:

*“The site identified at New Cross Gate has the capability to host major construction works. Our proposal for this site requires more land than we consulted on in 2017 and now includes Network Rail land to the north of the retail park. The overall site includes part of the New Cross and New Cross Gate Railsides Site of Importance for Nature Conservation and is adjacent to the Hatcham Park Road Conservation Area. The size and location of the site means that it has been identified as our preferred primary worksite for tunnelling activities for the extension. The site gives the opportunity to move materials and spoil to and from the site by rail. It also has direct access to London’s main road network..... Given these activities, the current Sainsbury’s supermarket, other retailers and petrol station could not remain operational on the site during construction.”*

2.37. Of note is the reference to that part of the site which is included within the New Cross and New Cross Gate Railside Site of Importance for Nature Conservation (SINC). Policy SP1 of Lewisham’s Core Strategy (adopted June 2011) requires the protection of SINC’s from development. Core Strategy Policy 12 (Open space and Environmental Assets) states that the Council will conserve nature which will be achieved by preserving or enhancing local biodiversity interests.

2.38. Policy GG2 of the draft London Plan requires new development to protect and enhance London’s open spaces including designated nature conservation sites. Policy G6 (Biodiversity and Access to Nature) reiterates the level of protection afforded to SINC’s.

2.39. The use of part of the SINC for major tunnelling works has the potential to negatively impact the SINC and to conflict with local, regional and national policy.

2.40. There is no evidence to show that TfL have assessed the impacts on the SINC resulting from the proposals. Ecological surveys should have been undertaken to determine the impacts and these should have been made available during the public consultation. There has been no detailed assessment of the ecological value of the SINC and surrounding areas and the likely level of impact resulting from the proposed scheme.

2.41. Not allowing consultees to understand and interrogate the potential impacts on biodiversity on a designated nature conservation site is a significant flaw in the consultation process.

### **The Developers’ Objections**

2.42. The developers are deeply concerned at TfL’s lack of genuine consideration of the concerns raised by the developers, and the rights of Sainsbury’s as the landowner and long-standing employer and business within the community. The developers have engaged with TfL at each formal consultation opportunity to identify issues and concerns regarding the BLE plans in respect of New Cross Gate Retail Park. Detailed objections have been submitted, supported by extensive technical evidence.

2.43. In making repeated detailed representations, the developers have previously identified fundamental short, medium and long-term adverse impacts that will affect their site at New Cross Gate and the New Cross/New Cross Gate District Centre and the credibility of the BLE proposals.

2.44. These objections and concerns have not been addressed by TfL and remain valid. The current consultation has raised new concerns related to the location of a station and tunnelling worksite at New Cross Gate. Copies of the previous responses to consultations area provided at **Appendix 3**. In summary, the concerns are as follows:

- There is no evidence of a robust and transparent business case for a capital intensive and disruptive infrastructure project such as the BLE. The project should be halted

pending the publication of a robust business case;

- Now that for the first time, it is acknowledged that the delivery of a station at New Cross Gate Retail Park will force the closure of Sainsbury's store, the location of the station at New Cross Gate must be re-consulted upon. Previous consultations assumed that Sainsbury's could continue to trade;
- The selection of New Cross Gate Retail Park as a station and now tunnelling worksite location has not been robustly justified and there has not been proper consideration of alternatives which will have less impact;
- The selection of New Cross Gate Retail Park as a station and now tunnelling worksite has many disadvantages which have not been properly articulated including the permanent extinguishment of the New Cross Gate Retail Park, which in turn will have significant socio-economic consequences for the future of the New Cross/New Cross Gate District Centre;
- The selection of New Cross Gate Retail Park as a station and now tunnelling worksite will delay the regeneration of the site by at least 11 years;
- TfL have not appropriately and robustly considered the consequential impact upon the regeneration/development potential of New Cross Gate Retail Park to provide over 1,000 new homes and a new Sainsbury's foodstore, maintaining the continuity of trading during construction and supporting the vitality and viability of New Cross Gate/New Cross District Centre;
- TfL do not appear to have fully considered other potentially viable options for locating New Cross Gate station, closer to the rest of the New Cross/New Cross Gate District Centre, including on the Goodwood Road site;
- TfL do not appear to have seriously considered alternative tunnelling worksites to New Cross Gate Retail Park. For example, the Wearside Road Depot is a more appropriate tunnelling worksite;
- The impact of the tunnelling worksite on a site of Importance for Nature Conservation (SINC) has not been assessed;
- There is no evidence that a Strategic Environmental Assessment (SEA) has been prepared to holistically evaluate the effects of the BLE proposals on the environment and social, cultural and economic circumstances; and
- There is no evidence that TfL have undertaken a robust cost benefit analysis of the BLE proposal, or indeed that there is a robust business case that justifies the significant public expenditure.

2.45. To support these objections, further technical work has been undertaken by the developers since the previous consultation. This confirms that the negative impacts of TfL's proposals for the New Cross Gate Retail Park are significant. This evidence is relevant in respect of Question 1. The further research relates specifically to the justification of the selection of the site for a new station, tunnel launch site and worksite. The research addresses:

- The retail impacts of the proposals: including the likely impact on the New Cross/New Cross Gate District Centre if the existing development, and current proposals for their redevelopment, are extinguished entirely;
- The socio-economic impacts associated with the loss of the social value of the store and the loss of the proposed housing; and
- Transport impacts associated with the night-time train movements required for the

removal of excavated materials.

- 2.46. The work has identified more appropriate alternative tunnelling worksite locations.
- 2.47. In addition, this work calls into question whether the substantial adverse cost of using the New Cross Gate Retail Park site for a station/works compound and/or tunnelling site against the benefits. We consider the impacts below.

#### Socio-Economic Impacts

- 2.48. The socio-economic implications of the loss of the Sainsbury's store are explained in full technical detail at **Appendix 4**.
- 2.49. The socio-economic analysis confirms that the Sainsbury's store and the area surrounding it is within Lewisham lower super-output areas (LSOAs) that have been assessed as some of the most deprived in England. The existing Sainsbury's store is found to contribute positively to each of the seven domains which constitute the English Indices of Deprivation, including:
- Income Deprivation;
  - Employment Deprivation;
  - Education, Skills and Training Deprivation;
  - Health Deprivation and Disability;
  - Crime;
  - Barriers to Housing and Services; and
  - Living Environment Deprivation
- 2.50. Given the level of deprivation experienced within the New Cross Gate area, it is apparent that the removal of the Sainsbury's store in its current format will detrimentally impact the community and potentially worsen its relative deprivation.
- 2.51. It is further estimated that the employment created by the existing Sainsbury's store generates gross value added (GVA) of some £8.7million per annum. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This significant figure demonstrates the major contribution of the Sainsbury's store to the Lewisham economy.
- 2.52. The analysis also estimates the additional value generated beyond labour productivity. This is referred to as social value, which represents a holistic evaluation of social, environmental and economic effects. Using a national framework for measuring social value, the socio-economic analysis estimates the social value of the store to be £4.8million per annum.
- 2.53. These figures are noteworthy given the evident deprivation experienced in the immediate New Cross Gate area, demonstrating the positive contribution of the store to the local community. The removal of the Sainsbury's store in its current format at New Cross Gate will be detrimental and undoubtedly lead to negative socio-economic impacts within the local community.
- 2.54. The socio-economic analysis further identifies that there would be an opportunity cost of not delivering the redevelopment proposals. It quantifies this as follows:
- Gross Added Value of £10.9million per annum, representing an increase of £2.2million per year compared to current operations. Consequently, the cessation of the redevelopment plans and removal of the current store operations would see a loss of over £11 million each year. This is a conservative figure as it fails to account for other jobs that would be lost from other businesses operating in the immediate area who rely on the Sainsbury's store as an 'anchor store' for the New Cross/New Cross Gate District Centre;



- The important contribution of the proposals to local housing need targets and the boost to local population which would generate circa £3.6 million for convenience expenditure and £6.5 million in comparison expenditure available to be spent within the New Cross/New Cross Gate District Centre;
- The boost to the New Cross/New Cross Gate District Centre turnover through an enhanced store, expanded Goods Online (GOL) services and improved links with the adjoining District Centre. The enhanced GOL services are estimated to improve store turnover by £11m as well as having considerable sustainability benefits, including the reduction in car use and the flow on impacts of this on traffic, road incidents and air quality in the local area.
- Improvement in the shopping environment allowing for positive impacts on the New Cross/New Cross Gate District Centre;
- Continued promotion of active transport through the convenience offered by an accessible supermarket located within the surrounding neighbourhood; and
- Additional job creation through the construction required for the scheme.

2.55. In summary, the benefits associated with the plans for the New Cross Gate store are extensive and would directly benefit the local economy, increase the housing stock and enhance community accessibility to vital services and infrastructure.

2.56. Following consideration of the published information relating to options assessments, including station site selection undertaken by TfL, the socio-economic assessment concludes that although work has been undertaken by TfL to assess the costs and benefits of the BLE project and the location of the New Cross Gate station, the research and subsequent analysis does not account for the wider value and contribution to the local community of the existing Sainsbury's store. In particular, it fails to capture the potential benefits of the Sainsbury's redevelopment proposals which seek to drive additional value to the local community as explained above.

#### Retail Impacts

2.57. Concern over the loss of the retail facilities at the Sainsbury's site in New Cross Gate was raised in the previous consultation, not only from the developers, but from members of public in response to the consultation process. Since our previous representation, this issue has been examined in greater technical detail by WSP | Indigo, who have undertaken a detailed Retail Impact Assessment (RIA) which accompanies the planning application recently submitted on New Cross Gate Retail Park site. The RIA is appended in full at **Appendix 5**.

2.58. The RIA adopts a robust, logical and accepted methodology and is underpinned by extensive survey data. Four surveys were undertaken to support the RIA to ensure it captured a full picture of the role and function of the Sainsbury's store within its catchment and its relationship with the adjoining retail park and New Cross/New Cross Gate District Centre; and to establish a thorough understanding of local shopping habits, including the way in which people currently use the New Cross/New Cross Gate District Centre.

2.59. Assessing the impact of a number of scenarios, the RIA determines that the worst-case scenario for the New Cross/New Cross Gate District Centre is the loss of the Sainsbury's store for ten plus years. This would result in the reduction of the District Centre's turnover by some £55m, an impact of -73%. This is undoubtedly a significant adverse impact in terms of the performance of the District Centre that will fundamentally undermine its role and function within the retail hierarchy and seriously impact on its health, vitality and viability.

2.60. Furthermore, the RIA identifies that the loss of the Sainsbury's store will have significant implications in terms of access to essential grocery needs for many local residents, particularly those who rely on public transport; loss of jobs, which will also largely be felt by

local residents; the unsustainable shopping patterns it will create, and the adverse highways impacts as a consequence of the closure of a popular store, diverting demand and trips to more distant stores<sup>1</sup>; and the loss of in-store facilities and opportunities, including the pharmacy, Explore Learning and the local charitable benefits that are delivered through Sainsbury's commitment to supporting their local communities.

- 2.61. The range and extent of quantitative and qualitative impacts identified represent a fundamental conflict with national and local planning policy (including NPPF paragraphs 85 and 90; paragraph 2.15 of the adopted London Plan and paragraph 6.17 of Lewisham Core Strategy) to support town centres, facilitating their growth, diversification and adaptation to meet the needs of their local communities.
- 2.62. Indeed, the impact of TfL's proposals to sterilise this site will also ultimately conflict with the stated intent of the BLE to support new homes and jobs in south east London (paragraph 3.1.7, TfL Background to Consultation Summary Report October 2019).
- 2.63. Alternatively, the proposals to redevelop the site, as proposed within the current application, instead represent a positive, policy compliant option which will deliver exceptional investment and regeneration.
- 2.64. The new store will be located at the front of the site improving its relationship with the rest of the New Cross/New Cross Gate District Centre. The RIA quantifies that the delivery of the application proposals will result in an increase in the turnover of the New Cross/New Cross Gate District Centre by at least 15%. The proposals will retain the important grocery facility for the local community and the foodstore anchor to the District Centre and facilitate an improvement to the performance (and consequently, the health) of the District Centre through an improvement in the opportunities for linked trips between the store and the District Centre; and an improvement in the range and goods available.
- 2.65. In summary, the detailed technical work that has been undertaken on behalf of the developers confirms that the retail impact of the loss of the Sainsbury's store and existing retail warehouses will have substantial negative short-, medium- and long-term implications for the local community. These legitimate 'costs' are crucial impacts that must be taken into consideration as part of the BLE consultation.

#### *Existing allocation for housing*

- 2.66. The site is allocated for housing in Lewisham's Site Allocations Plan (adopted June 2013) under allocation reference SA6, described as New Cross Gate Retail Park. The site is allocated for mixed retail use, housing, community facilities, a new station access for London Overground and public space, with an expected development timescale of 2011 to 2021. It is notable that the site is not safeguarded to accommodate development associated with the BLE.
- 2.67. In short, this site has the potential to make a significant contribution to meeting Lewisham's housing need and to deliver important affordable homes. The current application for over 1,000 units and retail uses confirms the commitment to, and deliverability of, the site for mixed-use development in the short-medium term which is a pertinent consideration in the context of the uncertainty over the deliverability of the BLE below.

#### *Certainty of the BLE*

- 2.68. There are significant questions over whether the BLE is likely to be delivered. At present, there is no funding in place for its construction; and an application to the Secretary of State for a TWAO (Transport and Works Act Order) to safeguard the necessary land will not be

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<sup>1</sup> Indeed, TfL's current proposals for Old Kent Road 1 anticipate the closure of the Tesco supermarket on the Old Kent Road further reducing choice and competition for shoppers.

made before 2023.

2.69. Putting this into perspective, it is anticipated that the first residential occupation of the developers' proposals could be delivered by the end of 2024. Therefore, the proposed delivery of significant new housing (including affordable housing) and new retail development to support and strengthen New Cross/New Cross Gate District Centre could be largely in place before the Secretary of State has ruled on a TWAO application and, indeed, many years before the BLE is delivered and operational.

2.70. To prevent the redevelopment of an available and deliverable brownfield site, with the potential to generate significant social and economic benefits for the local community in order to facilitate the proposed BLE when there are other more appropriate alternative options which will have less adverse socio-economic impacts is unacceptable.

#### Tunnelling worksite and Rail Network Related Impacts

2.71. The appropriateness of the New Cross Gate site as a tunnelling worksite is addressed in response to Questions 5 (a) and 6 below.

#### **2. Please let us have any comments on our proposals for a new combined Bakerloo line and Northern line ticket hall at Elephant & Castle station.**

2.72. No comments.

#### **3. Please let us have any comments on our proposed new route for the Bakerloo line between Lambeth North and Elephant & Castle.**

2.73. No comments.

#### **4. Please let us have any comments on our proposed route for the Bakerloo line extension between Elephant & Castle and Lewisham.**

2.74. The developers do not have an objection to the principle of the BLE (subject to the business case being proven) but, as stated in our response to Question 1, the developers do not agree with the proposed location of the station at New Cross Gate Retail Park. The developers do not believe that there has been adequate and effective consultation on the location of the station and there are serious concerns over the use of part of the SINC for major tunnelling works, the significant socio-economic and retail impacts of the loss of the Sainsbury's store, and the logistics of the use of the site for tunnel launching.

2.75. The proposed route between Elephant and Castle and Lewisham appears to have been largely governed by ease of construction. Insufficient weight has been given to the adverse impacts of the proposed alignment. This proposed route would result in New Cross Gate station being located further from the 'heart' of the New Cross/New Cross Gate District Centre than other viable options (such as Goodwood Road), the extinguishment of the only major foodstore in the District Centre and would delay the delivery of much needed new housing.

2.76. The location of the station at New Cross Gate Retail Park as an interchange would be inefficient compared to the Goodwood Road site which is centrally located, so reducing travel distances and journey times when changing trains. would encourage more economically efficient interchange movements.

2.77. Indeed, not only will Goodwood Road allow for a better interchange between the BLE and rail and bus services, it is a more appropriate station location because:

- it will have significantly less social and economic impacts, and less cost;
- it has been vacant for many years and is deliverable;

- it has better access to other services within the New Cross/New Cross Gate District Centre;
- it will, through Goodwood Road, have an acceptable access route which would not undermine the surrounding highways network;
- it will have the least impact in terms of job losses;
- it will have the least impact on the local community because there will be no loss of key shopping facilities;
- it will have the least impact in terms of the loss of delivery of new homes;
- it will have the least impact upon the vitality and viability New Cross/New Cross Gate District Centre; and
- it will allow a vital regeneration scheme to come forward on the New Cross Gate Retail Park which will deliver a new Sainsbury's store (with no closure during the development phase) and 1,161 new homes in accordance with policy and TfL's rationale for choosing the route. Moreover, this regeneration scheme will allow for the relocation of the Sainsbury's to the main road frontage of the site, allowing for better integration with the rest of New Cross District Centre, thus strengthening the centre.

**5. (a) We have considered three possible primary tunnelling worksites for the proposed extension at New Cross Gate, Hither Green and Catford. Our proposal is for the primary tunnelling worksite to be at New Cross Gate. Please let us have any comments on the possible primary tunnelling worksites.**

- 2.78. Despite repeated requests by the developers, no evidence has been provided by TfL to justify its statement that the most appropriate primary tunnelling worksite is at New Cross Gate. Therefore, the developers have instructed specialist consultants to investigate the three options posed by TfL. This independent expert analysis confirms that New Cross Gate is the least favourable site.
- 2.79. If the New Cross Gate Retail Park site is chosen as a primary tunnelling worksite, the existing uses on the site will have to cease and it is unlikely that they will be re-provided in the short to medium term.
- 2.80. The socio-economic costs of having the primary tunnelling works at New Cross Gate Retail Park, causing the closure of existing businesses, are set out in respect of consultation Question 1 and remain relevant.
- 2.81. The developers also have technical concerns about the appropriateness of the New Cross Gate Retail Park site.
- 2.82. A technical note from Dr Sauer and Partners (DSP) is provided at **Appendix 6**. This addresses the tunnelling worksite proposals within the current consultation. It confirms that there is no over-riding technical reason as to why the worksite is 'best' located at New Cross Gate. Indeed, the opposite is true as the opportunity to move spoil by rail from New Cross Gate is very limited (see paragraphs 2.83 – 2.92 below).
- 2.83. However, DSP confirm that there is an option to accommodate the tunnelling worksite at the Wearside Road Depot, which has been dismissed by TfL due to its size (based upon an arbitrary size of 2.4ha – see the response to Question 1). DSP demonstrate that the site could be expanded beyond the area considered by TfL to provide a suitably sized site, based on TfL's criteria. Indeed, due to the availability of more trains in this location, DSP also identify that the required site size at the Wearside Road Depot could be smaller than that proposed at New Cross Gate, as the requirement for spoil stockpiling and storage of tunnel segments would be less with the enhanced accessibility by rail of the Wearside Road

Depot site.

- 2.84. DSP also confirm that the location of a tunnel launching site at the Wearside Road Depot could significantly reduce the tunnel boring construction programme as it provides far greater locational efficiencies in terms of the requirements for assembly and disassembly of tunnel boring machines.
- 2.85. Further technical work has been undertaken by Intermodality. Intermodality have had regard to the implications on the rail network of the associated freight movements required to remove spoil and allow for the loading and unloading of materials. The Intermodality Assessment is provided in full at **Appendix 7**.
- 2.86. In summary, however, Intermodality have identified critical gaps in the consideration of worksite options by TfL which undermine the selection of New Cross Gate as the primary preferred tunnelling worksite option and raise serious questions over the robustness of TfL's approach. These failings undermine the credibility of the consultation as the public have not been given a clear understanding of the relative merits of the three options.
- 2.87. A key issue associated with the use of the New Cross Gate site as the primary tunnelling worksite includes the lack of any strategic or daily provision within the timetable for freight trains to operate; which means that the only option to accommodate freight movements through New Cross Gate station would be between midnight and 06:00.
- 2.88. Having freight movements overnight will significantly reduce the ability to undertake track maintenance works and could adversely impact nearby residents because of the noise and vibrations caused by the trains. The implications on the SINC and of reducing maintenance needs to be fully assessed, as does the impact on the amenity of residents and the SINC.
- 2.89. In short, this suggests that the site could only accept freight trains on and off the main line in the middle of the night unless other train services were retimed through the day which has previously been deemed unacceptable by the Mayor. The acceptability of retiming of trains during the day was addressed at length at the Howbury Park, Slade Green planning inquiry (PINS refs: APP/D5120/W/17/3184205 and APP/T2215/W/17/3184026).
- 2.90. This site sits within a heavily congested part of the London rail network, with very limited slack in the daily scheduling. Heavy freight movements are necessarily slow and have the potential to severely disrupt passenger services.
- 2.91. Intermodality confirm that both Wearside Road Depot and Hither Green sites have the potential to be better worksite options because they are located where there is greater network capacity to accommodate freight movements and onward connections to facilitate the disposal of spoil.
- 2.92. Furthermore, the capacity of the site to accommodate storage of spoil and other materials is not confirmed; and the risk of interruption to passenger services is far greater, with the associated implications for the surrounding network far more severe.
- 2.93. In conclusion, DSP and Intermodality identify a number of critical questions that need to be answered before it can be determined that TfL have undertaken a compelling and transparent assessment of worksite locations.
- 2.94. Finally, as noted in the response to Consultation Question 1, the tunnelling worksite at New Cross Gate will require development of a Site of Importance for Nature Conservation (SINC). The impact on this protected site has not been assessed.
- 2.95. Within this context, the lack of thorough consideration of alternative sites, including both Hither Green and Wearside Road, is perplexing when both represent better alternatives with respect to surrounding rail network capacity and opportunity to overcome constraints.

**5. (b) In our previous consultation in 2017 we discussed that there would be a worksite at Old Kent Road 1 to build the station. We have updated our proposals and we are now also considering carrying out tunnelling activities from the site towards Lambeth North. Please let us have any comments on our updated proposal for how we could use the Old Kent Road 1 worksite.**

2.96. No comments.

**6. Please let us have any comments for our proposals for the Wearside Road Council depot site where empty trains would be stabled.**

2.97. TfL's current proposals are to use the Wearside Depot site to accommodate train stabling at basement level.

2.98. As noted in respect of consultation Question 5 (a), the analysis by DSP and Intermodality confirms that the Wearside Depot is a better tunnelling worksite than the New Cross Gate site because:

- it is located at the southern end of the BLE and thereby allowing the tunnel boring machines to have two drives rather than four if the tunnels were launched from New Cross Gate. This has significant construction programme implications;
- it is better located to facilitate the removal of spoil by rail, being on a less congested part of the network;
- it would have fewer environmental impacts as trains would not be restricted to night-time movements only, and
- it would not sterilise a valuable regeneration site with advanced redevelopment plans.

2.99. There is no evidence that TfL have thoroughly assessed the options for accommodating the tunnel launching and worksite at Wearside Road Depot. With the necessary work undertaken, it is clear that the Wearside Road Depot would be more sustainably used initially as a tunnel launching site and subsequently to provide a permanent rail access to Hayes, than as a subsurface location for empty stock stabling. The costs and scale of construction works needed to achieve subsurface stabling sidings need to be considered against the alternative option (and additional net farebox income) of providing a connection to the Hayes branch and using land available around West Wickham and Hayes stations for stabling trains closer to the end of the line. We address this further in response to Question 9.

2.100. At no point has TfL engaged with developers to discuss the scope for a joint development solution for New Cross Gate, to integrate the new station works into the wider regeneration proposals. This could have achieved scale economies for the first construction works and further enhance station footfall and farebox income for the project. TfL have instead chosen to dismiss the developer's proposals and negate the associated regeneration benefits, and it is unclear whether this is reflected in the business case.

**7. Please let us have your views on the name of Old Kent Road 1 station. Suggestions for this station have included Old Kent Road or Burgess Park. This is a popular nearby park and there is a history of Tube stations being named after parks (e.g. Green Park, Regents Park). We welcome your views on the name of the station.**

2.101. No comments.

**8. Please let us have your views on the name of Old Kent Road 2 station. Suggestions for this station have included Old Kent Road or Asylum which reflects the nearby road of that name and the history of buildings in the area. We welcome your views on the**

name of the station.

2.102. No comments.

**9. We are considering a further extension of the route beyond Lewisham to Hayes and Beckenham Junction. This would involve a conversion of the National Rail line via Catford to Hayes to an Underground operation. Do you support or oppose our plans for a further extension of the route beyond Lewisham to Hayes and Beckenham Junction? Please let us have any comments about our proposals for a further extension of the route beyond Lewisham to Hayes and Beckenham Junction.**

2.103. The route alignment for the BLE has been specifically designed with access to the Hayes line in mind. Therefore, it would be short-sighted to construct sub-surface stabling sidings at the Wearside Road Depot, when the opportunity exists to design the alignment from the outset (including for TBM recovery) with a direct rail link onto the Hayes branch, using land around West Wickham and Hayes stations for stabling trains closer to the end of the line. Extending services south would also allow further interchange opportunities with Croydon Tramlink at Elmers End.

2.104. For transparency, the business case with and without the extension to Hayes should be made publicly available.

We look forward to the opportunity to continue to meet with TfL to discuss the above points constructively and in more detail. In the meantime, please contact Michael Adenmosun of Sainsbury's ([Michael.Adenmosun@sainsburys.co.uk](mailto:Michael.Adenmosun@sainsburys.co.uk)) for any immediate queries.

Yours faithfully,



**Sainsbury's Supermarkets Ltd**

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**From:** Richard R [REDACTED]  
**Sent:** 23 March 2023 23:48  
**To:** LocalPlan  
**Subject:** Consultation – Lewisham Local Plan

Richard Rigg  
APT Studio Holder [REDACTED]  
6 Creekside  
Deptford  
Hello

I have a few concerns with regards to the proposed Local plan for Creekside, I work from the above address 4 days a week and do require access for loading unloading equipment into the yard at the double steel gates at the corner of 6 Creekside, I as well as the majority of studio members (who number 42 in total) need this on occasion so is in very regular use. Any street furniture around this area would greatly impede delivery and pick up of large Artwork, so this area does really need to be clear of signage and furniture, it also serves often as a passing place for larger vehicles and I would think still form this function because of the turning circle. Can the number of free parking spaces remain the same, any allocated spaces could be extra, but this is again to support local business and residents, it would be good to retain some idea of a 'working' street co-existing alongside its residents. Is it possible just to mend and make good rather than the general 'modern' look which is at odds with the character of the area which has such a rich history, it feels like it may be sterilizing the area, improvements are needed so I'm fully behind the intention here, but I think it could be done in a more sympathetic manner, and the street to keep its distinctive feel,

Although not directly mentioned in this proposal, the proposed development at 5-9 Creekside is a example of an unsympathetic building, I fully appreciate housing is required but this could be on any generic modern street, whilst supporting only 35% 'affordable housing' this should be entirely affordable housing. APT has been at 6 Creekside since 1995, and maintains and looks after the historic buildings their and grounds, as the stated and shared aim is to both retain and look after the unique industrial and cultural heritage of this specific area, it's very important that it can retain as much of its identity as possible. Can happily discuss further,  
Many thanks  
Richard Rigg

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24 April 2023



Planning Policy Team  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
Catford  
London  
SE6 4RU

Dear Sir / Madam

**LEWISHAM LOCAL PLAN: REGULATION 19 CONSULTATION: WRITTEN REPRESENTATIONS  
OBO Artworks Creekside**

These representations are made on behalf of our client, Artworks Creekside, in relation to the Regulation 19 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises:

- Local Plan: Proposed Submission Document – January 2023;
- Policies Map – January 2023;
- Schedule of Proposed Changes to the Adopted Policies Map – December 2022
- Habitats Regulation Assessment – December 2022;
- Integrated Impact Assessment and associated Non-Technical Summary – December 2022;
- Draft Infrastructure Delivery Plan; and
- Relevant Evidence Base, including the Tall Building Review (2023), Tall Building Addendum (2022) and Draft Tall Building Study (2021), Lewisham SHMA (2022), Employment Land Review (2019), Site Allocations background paper (2021) and Residential Density Technical Paper (2020).

We have noted the scope of changes from the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents. Where substantial changes are made between Regulation 18 and Regulation 19 versions of the document, we comment below.

As a reminder, Artworks Creekside support the Vision for Lewisham as set out in the Local Plan, that Deptford will emerge as a cultural hub and that the Council will support local businesses, arts and cultural establishments, and where people thrive. The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.

## **Context of the Representation**

This section summarises the site and surrounding area and outlines the emerging scheme proposals at for the sites under the ownership of Artworks Creekside. The extent of these sites are shown in **Appendix I**.

### ***Site and Surrounding Area***

#### 2 Creekside

2 Creekside is a 4 storey building, known as The Birds Nest public house and the associated land. The building has a partial basement, and this space alongside the ground floor is used as the public house (Sui Generis). At first and second floor is an ancillary hostel / HMO which is accessed through via an internal stairway from the ground floor. The third floor is occupied by a flat which benefit from an external amenity space.

The building is in a poor condition and has suffered from a lack of investment having been through various ownerships in the recent past. The public house trade has suffered from changing national trends and the Birds Nest has been affected by this.

The land associated with the building is currently in a mixture of commercial and employment generating uses. The Big Red is a static double-decked bus which last operated as bar and pizzeria, and which made use of external seating between the building and the DLR railway viaduct which runs to the south of the site.

The eastern portion of the site is occupied by 8no. shipping containers which accommodate a range of creative business enterprises, and which provide affordable and flexible small commercial premises.

An application is currently being considered by the Council under ref: DC/22/125897

*“Detailed planning permission for the demolition of the Bird's Nest Pub with retained north and west façade and its redevelopment for a new public house (Sui Generis) and commercial units (Class E) at ground floor, and the delivery of residential units (Class C3) on all other floors, together with access, servicing / yard space, cycle parking, amenity space and refuse provision and associated works”*

#### 3 Creekside

3 Creekside includes a 2 storey building and associated single storey structures and is locally known as Medina Works. The building and the land associated are current used by a mixture of business as an art gallery, studio, café, creative workspaces and social space for the local community. The building benefits from large internal volumes with open floor plans and floor-to-ceiling heights.

The site does not include the two-storey warehouse structure topped with a double gabled roof directly to the north of 3 Creekside, and this falls within separate ownership under the postal address of 5-9 Creekside. We have worked with the development team on this adjacent site in order to bring forward a masterplan led redevelopment strategy.

An application is currently being considered by the Council under ref: DC/23/129784 for the:

*“Detailed planning permission for the demolition of existing buildings and structures on land at 3 Creekside, SE8 with retained southern façade of the Medina Works building, and the redevelopment of*

*the site to provide commercial units (Class E) at ground and upper floor and residential units (Class C3) on all other floors of the front building, and residential units within the Addey Street building, together with access, servicing/yard space, cycling parking, amenity, refuse provision and other associated works. Further detailed explanation (not forming part of the formal description of development) is set out below: \* 38 residential units (Use Class C3) \* 622.1 sqm of commercial floorspace (Use Class E) \* Maximum building height of 29.89m”*

In both instances, the applications seek to deliver the following development objectives:

- The creation of creative workspaces which align with their track record and approach to such spaces elsewhere:
- The delivery of an employment-led mixed-use development that responds to the Council's emerging policy designation and which deliver significantly more jobs than the existing site:
- The integration of the development into the emerging Creative Quarter that the Council has identified for Creekside, and for the wider Deptford Area:
- The successful integration of the Birds Nest public house into a development, and the provision of a viable public house which can act as a community hub:
- A series of commercial and employment areas which are financially sustainable:
- Residential development which assists in creating a vibrant community and achieves a successful mixed-use development.

### **Comments on Local Plan Main Submission Document**

A series of comments are provided below in respect of various sections of the Local Plan Main Submission Document which are of relevance to the proposed redevelopment of 2 Creekside and 3 Creekside.

#### ***Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)***

Artworks Creekside strongly support the continued strategy to deliver an Open Lewisham as set out in draft Policy OL1, in particular the continued strategic objective of ensuring that the growth and regeneration potential of Lewisham's Opportunity Areas, including Deptford Creek / Greenwich Riverside, are fully realised (part a), and the continued promotion of the optimisation and intensification of Strategic Sites and brownfield land for new housing and workspace (Part f) will ensure that development potential is able to be maximised and will encourage the most efficient use of land

Artworks Creekside continues to also support Part g of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.

#### ***Draft Policy QD1 - Delivering high quality design in Lewisham***

The policy advocates a design-led approach to development which ensures that the review of design options at an early stage of the development process are informed by an understanding of the local context. Our planning discussions with Council Officers to date have been undertaken on an iterative process and which has sought to understand the local context first, before then

building a re-development strategy that responds to the specific characteristics found within Creekside. We continue to support the qualitative criteria contained with the remainder of the updated Policy.

#### ***Draft Policy QD4 – Building heights***

Figure 5.1 identifies locations which are suitable for tall buildings. Artworks Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position within the Deptford Creek / Greenwich Riverside Opportunity Area.

We consider that Part A of the policy, which sets a clear quantitative definition for a tall building in Lewisham, in combination with Part C of the policy, which defines height ranges for tall buildings in specific localities aligns with London Plan Policy D9 Part A and is supported. However, we note that Part D of the policy prescriptively prohibits any exceedance of the maximums set out in Part D and does not set out any parameters where exceedances could be acceptable. We consider that clear parameters for exceedances are set out to ensure that they have due regard for the emerging context and ensure the most efficient use of land.

In our view setting maximum building heights is overly restrictive and could stymie the optimisation of sites through the design led approach, as set out in London Plan Policy D3. London

Part D of the draft policy QD4 lists assessment criteria for tall buildings, with D(c) referring to heights being sensitive to the site's immediate and wider context. We consider that this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised. This will ensure the most efficient use of land in these locations, such as Deptford Creekside.

Overall, we consider that the proposed policy wording and supporting text as drafted is not positively prepared or justified, and will place overly restrictive limits on development

#### ***Draft Policy QD6 – Optimising site capacity***

As noted above, Policy QD6 must include explicitly emerging contexts as part of the appraisal process in ensuring a design-led approach to be taken to optimise site capacity and establish an appropriate development density. The post-amble of the Policy talks of undertaking a series of appraisal for establishing the optimum site capacity and our planning application engagement with the Council to date has been through this iterative process.

#### ***Draft Policy HE2 – Designated heritage assets***

We previously made representations on the basis that Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, states that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that (conservation) area*'. The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements. Given that 2 and 3 Creekside fall within a Conservation Area, it is imperative that draft Policy HE2 is compliant with the NPPF.

Part C of Policy HE2 states that *'Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported'*. Clearly, not all features can be retained within a redevelopment proposal within a Conservation Area. The post-amble differentiates between 'original or other features'. The complexities of redevelopment schemes will require the Council to apply this Policy criteria with flexibility based upon the objectively understood importance of any such features.

Part E of draft Policy HE2 states that *'the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted'*. Artworks Creekside continues to disagree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed.

Given the *Dorothy Bohm v SSCLG (2017)* judgement, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit.

#### ***Draft Policy HE3 – Non-designated heritage assets***

Artworks Creekside note that the assessment criteria contained within draft Policy HE3 goes beyond the test of para. 197 of the NPPF which notes that *'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.

Instead, the draft Policy HE3 is requiring an assessment which goes above and beyond the requirements of the NPPF.

It is noted that Figure 6.2 of the Plan now includes a map showing the areas of non-designated heritage assets which encompasses the Deptford Creekside area.

#### ***Draft Policy EC1 – A thriving and inclusive local economy***

Artworks Creekside continue to support the Council's ambitions to support and promote cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Artworks Creekside.

#### ***Draft Policy EC2 – Protecting employment sites and delivering new workspace***

Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's *'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to light industrial uses.'* We note that this Policy now omits the reference to Policy B1.

Part B(a) of draft Policy EC2 has been re-worded and omits the reference to no net loss and instead states that the Council's forecast for net additional floorspace will be met, *"Within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land."*

We support the Council's approach to retaining and wherever possible delivering net gains in industrial capacity, including the intensifying the use of land in the revised wording of Policy EC2B (a).

***Draft Policy EC3 – Location and design of new workspace***

As demonstrated to the Council through our planning applications, we are seeking to create high quality, flexible and suitable workspaces for micro, small and medium-sized businesses. We therefore support Policy EC3.

***Draft Policy EC4 – Providing suitable business space and affordable workspace***

Artworks Creekside, having been involved in affordable workspaces on both sites for a number of years, broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace.

Part B of the Policy introduces the requirement that *“Development proposals should use the design-led approach to explore options for retaining, repurposing or creating new low-cost workspace that is designed to a high specification and will remain suitable for local businesses, including small businesses and those in the cultural, creative and digital industries”*. Through the development process of the relevant planning application, Artworks Creekside has sought to retain where possible existing floorspace but has promoted the redevelopment and provision of better quality and more suitable low-cost workspace for local businesses in the cultural, creative and digital industrial in new floorspace.

***Draft Policy EC6 – Locally Significant Industrial Sites (LSIS) – formerly LEL***

Artworks Creekside note that the principle of no net loss remains within the Policy, and that is now inconsistent with EC2B(a) which removes this wording and replaces with the requirement to retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land. Given that Policy EC2E includes a criteria for circumstances where a net loss of permitted in exceptional circumstances, It is suggested that the Policy should be re-worded in Criteria A:

“Development proposals should ~~ensure that there is no net loss~~ retain of industrial capacity within these locations, and seek to deliver net gains wherever possible”

Policy EC5 D should be updated accordingly to reflect the requirement of the London Plan to ensure that within LSIS' intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses. Notwithstanding this, Artworks Creekside support the principle that co-location is allowed within the Creekside LSIS

Part E of the draft Policy refers to LSIS has been omitted.

Supporting paragraph 8.35 recognises that site allocation policies have been prepared for co-location LSIS sites to ensure that co-location is coordinated and appropriately managed through the masterplan process, particularly to ensure that the function of the LSIS is not eroded by piecemeal development. Artworks Creekside note that the supporting text could go further and note that a master plan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation.

Within supporting paragraph 8.36, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that *'proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element'*. Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).

### ***Draft Policy EC19 – Public houses***

Artworks Creekside has reviewed the draft Policy EC19 and notes that there is a presumption in favour of retention of public houses. The proposals retain the public house and any future planning application will be accompanied by robust evidence on the viability of the current and future pub operation. The Birds Nest PH is a locally listed building – commentary is provided on the associated Policy elsewhere – and the Council's requirement to ensure that development does not detract from the character and appearance of the building is noted.

Policy EC19.C is noted and the requirement to provide an appropriate amount and configuration of floorspace to enable the continued viability of the public house is supported. We welcome that the previous reference to the requirement to ensure the replacement facility is of a comparable character and quality is removed. The replacement wording of EC19.C is supported, and indeed, our proposals for 2 Creekside result in a bigger and better floorspace that includes the required "dedicated performance space or amenity space that has been or can reasonably be used for cultural or community uses"

We do continue to object to the post-amble which remains inconsistent with the policy requirements whereby it requires *'proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ'*. This is not part of the Policy. Only the loss of public house through the change of use or redevelopment has this requirement. The post-amble should be revised accordingly.

Artworks Creekside continue to note the commentary about marketing evidence requirement that are expected to be appended to the Local Plan and suggest that this should be applied only where the public house use is being lost, and not where the public house is being re-provided.

### ***Draft Policy SD2 - Sustainable Design***

We support that Part D (and also new Part C) of the Policy now includes the caveat that new non-residential development of 500 sqm or more to achieve a BREEAM 'Excellent' rating is subject to feasibility.

## **Comments on Lewisham's North Area**

### ***Draft North Area Vision and Spatial Objectives***

The vision for the North Area explains that this area will benefit from continue renewal of older employment sites which will influence the areas evolving character whilst helping to improve its environmental qualities. Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood.

In addition the Creative Enterprise Zone (CEZ), and that the Deptford Creekside Cultural Quarter will be grow, and will cement the Borough's position as one of London's leaders in the creative, cultural and digital industries the renewal of industrial sites such as 2 and 3 Creekside.

Artworks Creekside have long since supported these principles in their current operations at the two sites and continue to support the Council's ambitions.

We note that Lower Creekside (Site Allocation 17) is now labelled as a Locally Significant Industrial Site.

#### ***Draft Policy LNA1 – North Area place principles***

Artworks Creekside support Part A of the policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries in accordance with Policy QL1. Part G of the policy is also supported.

#### ***Draft Policy LNA3 – Creative Enterprise Zone***

Artwork Creekside support the principles within Policy LNA3 for the designation of a Creative Enterprise Zone. Artworks Creekside note the approach within Policy LNA3(D). The current approach is unrealistic and is preclusive to redevelopment, and make the following suggestion:

*“Within the CEZ development proposals involving the loss of Class E(g) office and light industrial and Sui Generis business space that is currently occupied or suitable for use by the creative and cultural industries, including artists workspace, will be strongly resisted. Development proposals involving the loss or change of use of type of workspace will only be permitted where they:*

- a. *Ensure that an equivalent amount, or better quality, of Class E(g) workspace is re-provided within the proposal (which is appropriate in terms of type, use and size), subject to viability, market demand and site suitability, incorporating existing businesses where possible; or”*

#### ***Draft Policy LNA4 – Thames Policy Area and Deptford Creekside***

The relation between 2 Creekside and the Deptford Creekside has been key throughout the development proposals at 2 Creekside and Artwork Creekside appreciate the benefit of a positive relationship with the Creek; however it must not be an explicit requirement to provide public access to the Creek within a development site. We are pleased to see that ensuring accessible public space, 'where possible' is maintained.

Furthermore, it appears unnecessary to ensure that special regard is paid to the significance of heritage assets and their setting under this Policy. The impact upon designated and non-designated assets are appropriately dealt with under the respective Policies.

Artworks Creekside are also satisfied with the updated of the Criteria F which includes support for the existing boating community. The community has been integral to the development proposals at 2 Creekside and has written in support accordingly.

#### **Comments on draft Site Allocation 17 (Lower Creekside Locally Significant Industrial Site)**

The following sections assess the soundness of the draft Site Allocation 17 in accordance with Paragraph 35 of the NPPF which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy.

#### ***Site Allocation (Indicative Development Capacity)***



Site Allocation 17 comprises a number of development sites along Lower Creekside, including 2 Creekside and 3 Creekside. The sites owned by Artworks Creekside and which fall within the Allocation are included in **Appendix I**.

The Council identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 162 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan, but slightly more than the previous iteration of 160 residential units.

We have previously explained that the Site Allocation Background Paper (January 2021) which underpins the draft Local Plan should not be read prescriptively, and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested. For the Lower Creekside LSIS, this ratio is 33% : 0% : 20% : 47% for employment : main town centre uses : other : residential uses. This has not been reflected in the Allocation.

There is a clear inconsistency, and the Council has no methodology for this ratio, nor does it appear to have been tested via any viability method or consider the re-provision of the public house for instance on 2 Creekside. Whilst Artworks Creekside supports the principles of a co-located mixture of employment and residential uses, the indicative development capacity must not preclude viable redevelopment that contribute to a figure in excess of this capacity.

Furthermore, Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. We reiterate that without the sensitivity analysis, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 units (within an Urban location). The Council provides no explanation or methodology on how sensitivity analysis reduces a capacity.

We further reiterate that given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 162 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation that reflects the Council's earlier Policies.

As such we do not consider this aspect of the allocation has been positively prepared, and it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.

#### ***Site Allocation (paragraph 15.98)***

The site is allocated for comprehensive employment led redevelopment. Co-location of compatible residential and complementary uses are supported by Artworks Creekside within the current drafting. It is requested that '*compatible commercial*' uses are clarified in the Site Allocation.

#### ***Opportunities (paragraph 15.99)***

Artworks Creekside support the opportunities provided in updated paragraph 15.89 and support the new reference to the site being located in the Deptford Creek / Greenwich Riverside Opportunity Area.

***Development requirements (paragraph 15.10)***

Artworks Creekside note the continued reference to 'no net loss of industrial capacity' and this should be removed as it no longer accords with the earlier revisions to Policy EC2. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation.

As with the commentary to draft Policy LNA4, *'the new and improved public realm'* should not necessarily be located adjacent to Creek, whilst waterside access and amenity space should not be an explicit necessity, but as an option that should be tested via a design-led process. The requirement, to provide *"a new public path along Deptford Creek linking to Waterlink Way"* must not include land within the 2 Creekside development area. This could not be delivered and would prejudice the boaters and be contrary to the objectives of Policy LNA4.

***Development guidelines (paragraph 15.91)***

We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses.

Artworks Creekside will consider whether either sites are suitable to accommodate new workspace including artist studios and other SME accommodation, however we seek to retain the rights to prioritise these workspace over other viable employment uses.

We understand that development will need to be consider the impacts on designated heritage assets and understand that any new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR.

The recently commenced development at 1 Creekside (which forms part of the site allocation) must also be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 17, including density, height and massing.

***Summary***

We are supportive of most of the Plan and much of the allocation, and note than some comments in relation to the employment land, public house and energy policies have been taken into account.

Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), confirms the examination tests which will be applied to new Local Plans and spatial development strategies to ensure they have been prepared in accordance with legal and procedural requirements. Plans will be found 'sound' if they are positively prepared, justified, effective and consistent with national policy. Paragraph 36 of the NPPF states that the tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

For the reasons set out above, we have concern over the drafting of Policy EC6, in particular the reference to 'no net loss' rather than the suggested word. We also set out comments in relation to the Creative Enterprise Zone policy requirements.

In detailed respect, Artworks Creekside consider that the proposed indicative site capacity for residential units is significantly lower than what could be reasonable achieved across the Allocation and is unreasonable restrictive. It has not been supported by proportionate evidence and having worked with adjacent landowners; the overall residential capacity of Lower Creekside has potential to be higher than proposed in the policy wording. We also make comments on the potential inclusion of a public path on the 2 Creekside development site. For those reasons, the Allocation is not justified.

We would therefore suggest that the recommendations set out in these representations should be carefully considered for the plan as a whole to be found sound. We reserve the right to make further comments at the Examination in Public in the event that our requested changes and comments are subsequently taken into account.

**Next Steps**

We would welcome the opportunity to be kept informed of progress relating to the document preparation and should you require any further information relating to these representations, then please do not hesitate to contact me.

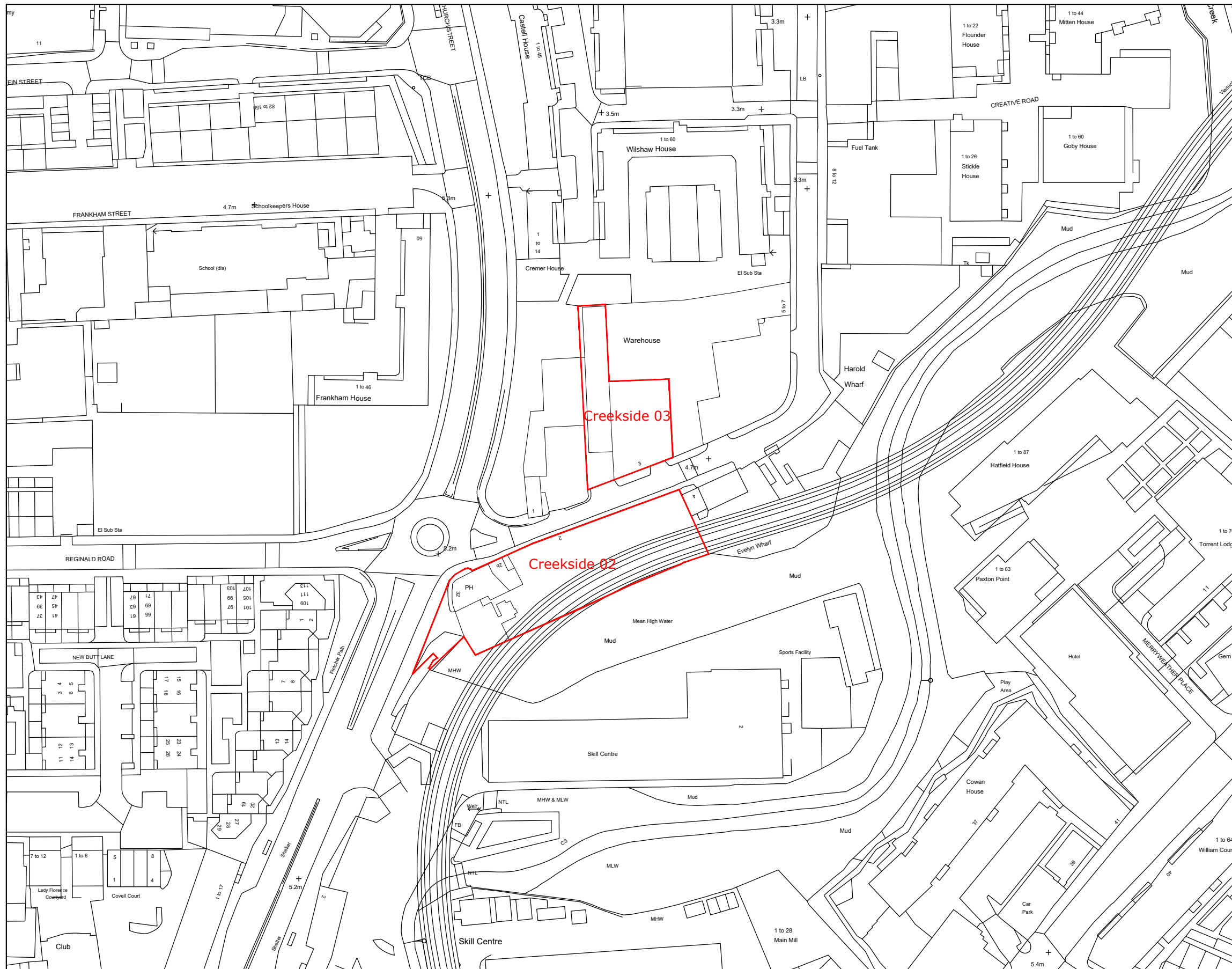
Yours faithfully



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**For and on behalf of Avison Young (UK) Limited**

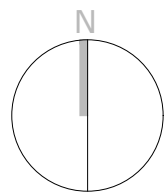


## **Appendix I - 2 Creekside and 3 Creekside Site Plan**



Location Plan

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previous revisions  
 revision:  
 --- First Issue.  
 A Updated in line with title plans.

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21 April 2023

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Planning Policy Team  
London Borough of Lewisham  
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1 Catford Road  
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SE6 4RU



Dear Sir / Madam

**Representations to Regulation 19 Consultation on Lewisham Local Plan: Proposed Submission Document: January 2023****Joint Representation on behalf of Laurence Cohen and Melanie Curtis (Freehold Landowners) and CA Ventures and Fifth State (Developers of 5-9 Creekside, Deptford)**

We write on behalf of Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State (the Owners and Developers) in representation to the Lewisham Local Plan: Proposed Submission Document (January 2023) prepared by the London Borough of Lewisham (LBL), under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

Fifth State is a platform focused on delivering community-led workspace and residential offerings. Student resident well-being is at the heart of their model, and their buildings are designed and programmed to encourage a sharing and social ethos to help combat loneliness and mental health issues, which can be prevalent in large cities like London. Fifth State is promoting 5-9 Creekside, Deptford for employment-led mixed use redevelopment, incorporating the co-location of student accommodation.

CA Ventures are a niche investor, developer and operator of student accommodation that has developed over 42,000 student beds, 78 communities and 48 university markets. Its approach is based on fostering thoughtful and creative design, recognising that it is key to the satisfaction and well-being of the students that call their communities home. CA ventures are currently constructing their first community-led, mixed use purpose-built student accommodation scheme on Trundley's Road and will be delivering the proposals set out in the planning application for 5-9 Creekside, Deptford (Ref. DC/23/131085).

Having reviewed the Regulation 19 version of the draft Local Plan and the accompanying evidence base documents, this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 17 Lower Creekside Locally Significant Industrial Site).

The Owners and Developers support the Vision for Lewisham as set out in the draft Local Plan, in particular that Lewisham will continue to be a dynamic place which supports local businesses, arts

and cultural establishments, and where people thrive. The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.

We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council in preparing its final Submission Local Plan and during its examination.

### **CONTEXT OF THE REPRESENTATION (5-9 CREEKSIDE)**

This section summarises the site and surrounding area and outlines the emerging scheme proposals at 5-9 Creekside.

#### ***Site and Surrounding Area***

The site comprises an existing two storey building / part warehouse and servicing yard. The buildings are currently occupied by a wholesale alcohol distributor and cash and carry (Use Class B8) and artist studios (Use Class E). The total existing floorspace is 2,460 sqm.

5-9 Creekside is bound to the east and south by Creekside Road. The northern boundary backs on to the Crossfields Estate and to the west of the site is 3 Creekside which comprises the Medina Works building which accommodates a mix of art gallery, studios and creative workspaces.

The wider Deptford Creekside area is undergoing change, with nearby developments including the Fuel Tank employment space managed by Workspace, mixed-use commercial and residential developments at Kent Wharf, Sun Wharf and Faircharm Dock and the Trinity Laban Conservatoire of Music and Dance. 1 Creekside has substantially completed its recent planning consent permission for an 8 storey building which will deliver 56 homes and 1,541 sqm of commercial space (Ref. 18/106708). In addition, planning applications for 2 Creekside (Ref. DC/22/125897) and 3 Creekside (Ref. DC/22/129784) have been submitted, following collaborative work with the developers of 5-9 Creekside to develop the proposals for all three sites.

#### ***Emerging Development Proposals***

Fifth State and CA Ventures have recently submitted a planning application for the redevelopment of 5-9 Creekside for a mixed-use development comprising commercial and student accommodation uses (Ref. DC/23/131085). The scheme proposals responds to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area.

The key principles of the proposed design include:

- Demolition of existing buildings to create replacement workspace on site which is being designed to respond to local market demand for employment space such as light industrial or creative industries and create an overall increase in jobs;
- Delivering an employment-led mixed-use development including the introduction of co-location of student accommodation;

- Providing high quality student accommodation and complementary facilities which are suitable with the continued employment operation of the site;
- Working collaboratively with neighbouring landowners to develop a comprehensive design approach to the regeneration of the area; and
- Responding positively to the Deptford Creekside Conservation Area.

The above principles have been underpinned by the relevant technical and environmental assessments.

### ***Comments on Local Plan Main Issues and Preferred Approaches Document***

Melanie Curtis, Laurence Cohen and Fifth State Ltd previously provided representations in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document (Regulation 18 draft) in April 2021. These representations are provided in Appendix 1 for completeness.

## **COMMENTS ON LOCAL PLAN: PROPOSED SUBMISSION DOCUMENT: JANUARY 2023**

### ***Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)***

The Owners and Developers of 5-9 Creekside strongly support the strategy to direct new development to growth and regeneration nodes and well-connected sites in the opportunity areas to deliver an Open Lewisham as set out in draft Policy OL1. Ensuring that the growth of Lewisham's Opportunity Areas, including Deptford Creek / Greenwich Riverside, is managed in accordance with the local character (part a), and promoting the optimisation and intensification of Strategic Sites (part F) will ensure that development potential is able to be maximised and will encourage the most efficient use of land, in line with paragraph 120 of the NPPF. The Owners and Developers also support Part G of the draft policy which requires development to be delivered through a design-led approach to make the most optimal use of land and respond positively to local distinctiveness in order to deliver inclusive, safe neighbourhoods.

### ***Draft Policy QD1 - Delivering high quality design in Lewisham***

Whilst the Owners and Developers of 5-9 Creekside support, in principle, the draft policy which advocates a design-led approach to development, it is considered that in order to reflect London Plan Policy D3 (optimising site capacity through the design-led approach), further text should be added which positively promotes optimising the capacity of sites, including site allocations, providing policy support for higher density developments in well connected locations. In our view, the proposed amends would ensure the policy is consistent with national and strategic policy and would subsequently enable the delivery of sustainable development in accordance with the NPPF and London Plan.

Such wording is considered necessary to ensure that the Local Plan is able to be found to be positively prepared and consistent with the NPPF and London Plan.



***Draft Policy QD4 – Building heights***

Figure 5.1 identifies locations which are suitable for tall buildings. The Owners and Developers of 5-9 Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position within the Deptford Creek / Greenwich Riverside Opportunity Area.

We consider that Part A of the policy, which sets a clear quantitative definition for a tall building in Lewisham, in combination with Part C of the policy, which defines height ranges for tall buildings in specific localities aligns with London Plan Policy D9 Part A and is supported. However, we note that Part D of the policy prescriptively prohibits any exceedance of the maximums set out in Part D and does not set out any parameters where exceedances could be acceptable. We consider that clear parameters for exceedances are set out to ensure that they have due regard for the emerging context and ensure the most efficient use of land.

In our view setting maximum building heights is overly restrictive and could stymie the optimisation of sites through the design led approach, as set out in London Plan Policy D3. London

Part D of the draft policy QD4 lists assessment criteria for tall buildings, with D(c) referring to heights being sensitive to the site's immediate and wider context. We consider that this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised. This will ensure the most efficient use of land in these locations, such as Deptford Creekside.

Overall, we consider that the proposed policy wording and supporting text as drafted is not positively prepared or justified, and will place overly restrictive limits on development.

***Draft Policy QD6 – Optimising site capacity***

The Owners and Developers of 5-9 Creekside support draft Policy QD6 which requires a design-led approach to be taken to optimise site capacity and establish an appropriate development density. This is considered to broadly align with London Plan Policy D3, however further advocacy of delivering higher density developments in appropriate locations should also be incorporated into this policy. Paragraph 5.44 of the draft Local Plan states that the policy seeks to ensure that *'the delivery of Good Growth will necessitate that new developments use the Borough's limited supply of land effectively and efficiently whilst improving the quality of places and spaces that people inhabit and use, along with the natural environment'*. As such, support for higher density development should be explicitly expressed within the policy wording itself.

The Owners and Developers of 5-9 Creekside support the introduction of Part C to this policy, which notes that where development proposals do not meet the indicative capacity, they will only be supported where it is clearly demonstrated that the optimal capacity will be achieved, having regard to Parts A and B of the policy. However, it would be helpful if draft Policy QD6 could explain that the indicative development capacity figures proposed as part of all the draft Site Allocations are not intended to be a cap on development quantum, rather a broad indication of capacity.

### **Draft Policy HE1 – Lewisham’s historic environment**

The Owners and Developers of 5-9 Creekside support the thrust of draft Policy HE1 which seeks to preserve or enhance Lewisham’s historic environment. Part B of the policy provides a simplified version of the assessment of potential impacts from the key heritage tests outlined in NPPF paragraphs 199 to 202, which will be the relevant tests against which planning decisions will be made should the proposed development lead to either substantial or less than substantial harm. The policy therefore aligns with the national and strategic framework and we have no further comment to make at this time.

### **Draft Policy HE2 – Designated heritage assets**

We recognise that Conservation Areas are subject to statutory protection under Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that *‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’*. The 1990 Act and NPPF paragraph 206 note that new development can benefit the character and appearance of a conservation area through enhancements.

Part E of draft Policy HE2 states that *‘the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted’*. The Developers of 5-9 Creekside do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed.

The impact of development proposals on a conservation area must take into account the development proposals as a whole, i.e. the impact of demolition as well as the impact of the replacement proposals (as established through *Dorothy Bohm v SSCLG (2017)*). Even in cases where the building or feature proposed to be demolished is identified as making a positive contribution to the area, it is necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit. As such it is suggested that Part E of the policy is rephrased to better reflect the relevant heritage tests, as set out below:

*‘Buildings or structures that have been identified to make a positive contribution to the character or appearance of the conservation area should be retained wherever possible, and where buildings and structures are proposed to be demolished the impacts of the demolition should be balanced against the impacts of the replacement proposals.’*

### **Draft Policy HE3 – Non-designated heritage assets**

The Owners and Developers of 5-9 Creekside note that the wording of draft Policy HE3 Part A which identifies that *‘development proposals will only be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset’s setting’* goes beyond the NPPF Paragraph 203 test which states that *‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’*. As outlined in our comments above, it will be necessary for a balancing

exercise to take place to assess the impact of the loss of a designated or non-designated heritage assets which must be considered against the replacement development proposal, as well any public benefits which arise from the development proposals.

Part B of draft Policy HE3 sets out a blanket refusal of any schemes that harm the significance of a non-designated heritage asset. As above, we consider this to go beyond the test set out in paragraph 203 of the NPPF, which requires the effect of development proposals on the significance of heritage assets require a balanced judgement. We consider that for soundness and consistency purposes Parts A and B of draft Policy HE3 should be redrafted to reflect Paragraph 197 of the NPPF, which requires a balanced judgement to be taken (rather than specifically looking to preserve or enhance the significance of a non-designated heritage asset or otherwise refusing the application).

### **Draft Policy HO7 – Purpose built student accommodation**

The NPPF Paragraph 11 requires that: a) plans should promote a sustainable pattern of development that seeks to meet the development needs of their area, and adapt to its effects; and b) that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. NPPF Paragraph 62 goes on to state that *'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including [...] students).'*

London Plan Policy H15 considers purpose-built student accommodation (PBSA) and requires Boroughs to ensure that local and strategic need for PBSA is addressed. The overall strategic requirement for PBSA in London is for 3,500 bed spaces to be provided annually over the plan period. Borough level targets for PBSA bed spaces are not provided as it is acknowledged that the location of need will vary over the plan period in line with higher education institution growth and expansion plans, together with the availability of appropriate sites.

The Draft Local Plan is underpinned by the Lewisham Strategic Housing Market Assessment (2022) which considers the need for different types of accommodation and affordable housing needs drawing on demographic data and information provided from LBL and stakeholder consultation.

The main finding in respect of student housing is that *'there is a considerable student population in Lewisham that is partly housed in the private rented sector and partly on-campus. Whilst pressure on the private rented sector from students has been mitigated by the delivery of significant amounts of PBSA, the sector will continue to be subject to demand from students unable to afford PBSA.'* We note that paragraph 6.71 of the SHMA identifies that there were 2,553 student only households in the borough.

Whilst the SHMA provides an overview of student accommodation provided at Goldsmiths University and the University of Greenwich, no conclusion is drawn on the need for the delivery of PBSA in Lewisham. The SHMA acknowledges that there will continue to be pressure on the private rented sector to accommodate students, but does not identify how much PBSA is needed to address future need and demand. As such we question whether the NPPF requirement to objectively assess need for student housing has been adequately fulfilled by this assessment and

we would recommend transparency around student housing need is provided within the Draft Local Plan.

Notwithstanding concerns regarding the evidence base, draft Policy HO7 provides a supportive basis for assessing development proposals for PBSA. The policy wording broadly reflects London Plan Policy H15 requirements for PBSA, which the Developers of 5-9 Creekside endorse.

Part A of draft Policy HO7 sets out parameters that student housing proposals must demonstrate compliance with. Supporting paragraph 7.756 recognises that Lewisham is home to a number of further and higher education providers, particularly in north Lewisham which is home to Goldsmiths College, Trinity Laban Conservatory of Music and Dance and Lewisham College, as well as the nearby Greenwich University. As such it is considered that applications for PBSA coming forward in the north of the borough will be able to satisfactorily demonstrate that they will help to meet an identified strategic need for student accommodation (meeting policy requirement HO8 Part A(a)). Whilst the supporting paragraph makes reference to the geographical concentration of education institutions in certain parts of the borough, this should also be acknowledged in the policy wording as draft Policy HO7 requires the concentration of PBSA in the area to be considered, which will be influenced by the proximity to education institutions.

Part A(b) of draft Policy HO7 requires the accommodation to be secured for use by students as demonstrated by an agreement with one or more specific higher education provider(s). We would suggest this is extended to include nominations agreements with student housing management companies to provide greater flexibility whilst also securing use by students.

We note that Part A(c) of the policy seeks to secure the maximum level of affordable student accommodation in line with the London Plan. However, policy H17 of the London Plan sets out a fast track route for PBSA schemes that deliver 35% affordable housing. We would suggest that the eligibility to follow the fast track route is set out clearly in draft Policy HO7 rather than in supporting paragraph 7.59.

Fifth State acknowledge that the Borough's main strategic requirement is for genuinely affordable, conventional housing, and that PBSA will be counted as delivering homes against the Borough's strategic housing target and will be counted on a 2.5:1 basis (i.e. two and half PBSA bedrooms to one unit of conventional housing).

### ***Draft Policy EC2 – Protecting employment sites and delivering new workspace***

Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's *'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.'*

Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained *'ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process'*. The supporting explanatory text advises that safeguarding of employment land includes *'floorspace, yard space for operations and servicing space'*.

The Owners and Developers of 5-9 Creekside support the principle of intensifying employment development and the ability to co-locate employment uses alongside other uses. They also welcome the removal of the requirement to ensure no net loss of operational yard space, which is consistent with Policy E7 of the London Plan.

### ***Draft Policy EC3 – High quality employment areas and workspace***

Whilst the Owners and Developers of 5-9 Creekside support draft Policy EC3, which outlines a number of criteria to promote the delivery of high quality, flexible and suitable workspaces for micro, small and medium-sized businesses, the requirement set out in Part A(b) is unlikely to be deliverable in all instances. It is recommended that in order to be effective, the policy wording provides a greater degree of flexibility, noting that all tenants may not seek prior internal fit out beyond shell and core.

### ***Draft Policy EC4 – Low cost and affordable workspace***

We note that Part B of this policy has been amended to include the retention of existing low cost workspace. Whilst the Owners and Developers of 5-9 Creekside strongly support the retention of existing affordable workspace on employment sites, the requisite to retain existing low cost workspace is onerous and without justified threshold. The definition of 'low cost workspace' is unclear and it must be noted that many existing employment sites yield rental prices equivalent to the value and quality of the floorspace. Where developers undertake significant cost to update and renew these workspaces, the natural market response is that rental prices increase and this is an important incentive that allows development to be brought forward. If an onerous requirement to retain low cost workspace is introduced it will undermine the deliverability of schemes seeking to redevelop, renew and modernise employment sites across the borough through significant burden upon viability. This may subsequently threaten the delivery of the plan insofar as it relates to the delivery of improved and increased employment/industrial capacity and the creation of new jobs, and the provision of new affordable workspace for SMEs. We would therefore suggest Part B of draft policy EC4 is revised to replace 'low cost' with 'affordable' throughout such that the parameter and key terms are more clearly defined.

The Owners and Developers of 5-9 Creekside broadly support the principle of delivering affordable workspace across the borough. The proposed draft Policy wording seeks major developments to provide at least 10% of new employment floorspace as affordable workspace at 50% of market rents. However, in line with the requirements set out in the NPPF, due consideration of scheme viability must also be incorporated within the policy. As such, in the absence of supportive evidence to justify the affordable workspace parameters proposed, we consider that the policy wording should be amended to incorporate a greater degree of flexibility, noting that it may be possible to deliver a wider public benefit where a greater quantum of floorspace is offered as affordable workspace at a slightly lower discount rate (e.g. 20% discount), subject to site specific

circumstances and the employment land profile in the immediate area. The application of a blanket affordable workspace requirement without scope for viability considerations or site specific conditions does not comply with the NPPF (thereby raising issues of soundness) and may prohibit the delivery of affordable workspace to meet local needs.

### ***Draft Policy EC6 – Locally Significant Industrial Sites***

The Owners and Developers of 5-9 Creekside broadly support the aims of draft Policy EC5 which supports the co-location of employment and other compatible uses at selected LSIS locations (including Lower Creekside).

Supporting paragraph 8.35 recognises that site allocation policies have been prepared for co-location LSIS sites to ensure that co-location is coordinated and appropriately managed through the masterplan process, particularly to ensure that the function of the LSIS is not eroded by piecemeal development. Whilst the Owners and Developers of 5-9 Creekside strongly support this recognition, we consider the supporting text could go further and note that a master plan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation.

Within supporting paragraph 8.36, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that *'proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element'*. Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).

### ***Draft Policy EC10 – Workplace training and job opportunities***

Draft Policy EC10 seeks to a threshold approach to calculating financial contributions to workplace training. It is noted that this applies a value of £715 per dwelling/job created by the development to reach an overall financial contribution. We consider that greater flexibility to the application of this contribution should be applied, particularly noting that some schemes will be delivered with a strong social value strategy that seeks private partnerships and commitments towards procuring local staff and partnering with local education institutions. In instances where a strong social value strategy is committed to and secured by the Section 106 legal agreement, financial contributions for the delivery of workplace training can reasonably be reduced.

### ***Draft Policy EC18 – Culture, creative industry and night-time economy***

Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Developers.

***Draft Policy SD2 - Sustainable design and retrofitting***

Part C of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM 'Excellent' rating. We welcome the introduction of specific wording to enable consideration of any site specific technical constraints which may mean that an 'Excellent' rating cannot be achieved.

**Comments on Lewisham's North Area*****Draft North Area Vision and Spatial Objectives***

The Council's vision for Lewisham North Area is strongly supported by the Owners and Developers of 5-9 Creekside. The vision re-imagines Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood. In addition the Creative Enterprise Zone will cement Lewisham's position as a leader in the creative and cultural industries which will feature modern and affordable workspace, including artist studio space, building on the presence of Goldsmith's College, Trinity Laban and Albany Theatre. The objective to establish a Creative Enterprise Zone at Deptford Creekside fits well with the development aspirations the Developers have for 5-9 Creekside.

***Draft Policy LNA1 - North Area place principles***

The Owners and Developers of 5-9 Creekside support Part A of the draft policy which seeks to facilitate Good Growth, with reference to draft policy OL1. Whilst the Developers agree that heritage-led regeneration will be important within the North Area, particularly for areas identified in Part D(a) to (c) (including Royal Naval Dockyard, Grand Surry Canal and Deptford High Street and New Cross High Street), where sites are identified to accommodate growth to support the Council's objectively assessed needs, heritage considerations must be considered alongside public benefits as part of the overall planning balance (this has already been mentioned in response to draft Policies HE2 and HE3).

***Draft Policy LNA3 - Creative Enterprise Zone***

The creation of a new Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Owners and Developers of 5-9 Creekside.

**Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site)**

The following sections assess the soundness of the draft Site Allocation 17 in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) (2021), which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy.

***Site Allocation (Indicative Development Capacity)***

Site Allocation 17 comprises a number of development sites along Lower Creekside, including 5-9 Creekside which is bound by the road to the south and east.

The summary page identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 162 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan (which was not consulted on).

The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested.

Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. We consider that in accordance with the SHLAA density assumptions, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 homes (within an Urban location). Whilst we acknowledge that there are heritage sensitivities within Lower Creekside, we consider that the indicative development capacity of 160 new homes is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation.

This position is evidenced through pre-application design development at 5-9 Creekside and neighbouring 2 and 3 Creekside sites which indicates that the site allocation may have a greater site capacity, taking into account heritage, townscape, environmental and technical considerations. In addition given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design led approach.

As such we do not consider this aspect of the allocation has been positively prepared, and it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.

#### ***Site Allocation (paragraph 15.98)***

The site is allocated for comprehensive employment led redevelopment. Co-location of compatible commercial, residential and complementary uses are supported within the current drafting. The Owners and Developers request that the proposed co-location uses also include PBSA, which is considered to be suitable in this location, subject to complying with London Plan Policy H15 and draft Local Plan Policy HO7.

#### ***Opportunities (paragraph 15.99)***

The Owners and Developers of 5-9 Creekside support the opportunities provided in draft paragraph 15.89, and reference to the site being located in the Deptford Creek / Greenwich



Riverside Opportunity Area, as this is envisaged to provide new jobs and homes through the plan period.

***Development requirements (paragraph 15.100)***

The Owners and Developers of 5-9 Creekside support the development requirements to not reduce industrial capacity or compromise the functional integrity of the employment location. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation.

We do however question the requirement that development must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. We would note that this is contrary to draft Policy EC6, where supporting paragraph 8.35 recognises that site allocation policies have been prepared for co-location LSIS sites to ensure that co-location is coordinated and appropriately managed through the masterplan process. We suggest that point 1 of paragraph 15.100 is amended for consistency with draft Policy EC6, noting that the site allocation policies have already coordinated co-location through the masterplan process.

Furthermore, the principle of mixed use development on the sites is already secured via the Site Allocation, and we consider the nature of the area and existing uses does not require a masterplan to be approved in order for the aspirations of the site allocation to be realised.

***Development guidelines (paragraph 15.91)***

We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses.

The Developers consider the 5-9 Creekside site is suitable to accommodate new workspace including artist studios and other SME accommodation.

We understand that building heights will need to be designed having regard to designated and non-designated heritage assets, including St Paul's Church, Deptford Church Street, the Crossfields Estate and the Deptford Creek Conservation Area (and as such will be assessed against the relevant heritage legislation and policies as considered in further detail earlier in this letter).

We support that new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR. We request that the development currently under construction at 1 Creekside (which forms part of the site allocation) is also added to the list of buildings which should be considered as part of the emerging character of the area, particularly as it has now been substantially completed on site. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 17, including height and massing.

## Summary

The Owners and Developers of 5-9 Creekside are supportive of the direction of the draft Local Plan and look forward to working with the Borough to deliver regeneration within Creekside, as per the site allocation. However we request that PBSA is included within the proposed development uses. Notwithstanding this and based on our current assessment, we consider that the proposed indicative site capacity may be overly restrictive and so we question whether the allocation has been positively prepared in accordance with the requirements of the NPPF. We consider that the indicative site capacity is not supported by proportionate evidence and therefore does not seek to meet the area's objectively assessed needs. Indeed the design work that has been prepared by the Developers in conjunction with other landowners and development plots adjacent to 5-9 confirms that the overall capacity of Lower Creekside has potential to be higher than proposed in the policy wording. We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound. We reserve the right to make further comments in relation to the policy allocation at the next available opportunity.

Additionally, we consider there to be some elements of the draft plan which require further modifications in order for the plan to be sound found, including:

- Introducing policy wording to positively promote the optimisation of the capacity of sites, including site allocations, and higher density developments in well connected locations in accordance with the NPPF and the London Plan;
- Including the consideration of emerging context and site optimisation to assess and determine appropriate building heights, and setting out clear parameters where exceedances of the height ranges expressed in Policy QD4 could be acceptable, to ensure the most efficient use of land in accordance with the NPPF and the London Plan;
- Redrafting of heritage policies to ensure that they have consideration for replacement proposals, the balancing exercise and the public benefits of development in accordance with the key tests set out the NPPF;
- Additional assessment as to the need for student housing in the Borough, including quantification of the student housing required to relieve pressure on the private sector rental market and meet existing and future needs, to ensure the objective needs of the borough have been properly assessed and the plan has been positively prepared;
- Further consideration of the drafting of policies and supporting text as there are key policy drivers included in supporting text rather than within the policy wording itself, i.e. that the affordable housing fast track route set out in the London Plan applies to PBSA development;
- Providing a greater degree of flexibility within policy, i.e. the provision of affordable workspace which should have regard for the extent of public benefit delivery achieved through a higher proportion of floorspace provided at lower discount rates and the employment land profile in the immediate area, and workplace training contributions,

which should have regard for the nature of development, social impact strategies and private partnerships and commitments; and

- Ensuring that key terms are parameters more clearly defined, i.e. the replacement of 'low cost' with 'affordable' in draft policy EC4 and that a masterplan approach is not required for site allocations.

### **Next Steps**

We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan. The Owners and Developers of 5-9 Creekside are very keen to engage with LBL and wish to continue to be involved in subsequent consultations.

Please do not hesitate to contact Rachel Crick or Smruti Patel ([smruti.patel@avisonyoung.com](mailto:smruti.patel@avisonyoung.com)) at Avison Young should you wish to discuss any of the points raised above.

Yours sincerely



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**For and on behalf of Avison Young (UK) Limited**

# Appendix I

Representations by Melanie Curtis, Laurence Cohen and Fifth State Ltd on the Local Plan  
Main Issues and Preferred Approaches Document (Regulation 18 draft) in April 2021

08 April 2021



Planning Policy Team  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
Catford  
London  
SE6 4RU

Dear Sir / Madam

**Representations to Regulation 18 Consultation on draft Lewisham Local Plan: Main Issues and Preferred Approaches dated January 2021****Joint Representation on behalf of Laurence Cohen and Melanie Curtis (Freehold Landowners) and Fifth State Ltd (Developer of 5-9 Creekside, Deptford)**

We write on behalf of Laurence Cohen and Melanie Curtis and Fifth State (the Owners and Developer) in representation to the draft Lewisham Local Plan 'Main Issues and Preferred Approaches' document (January 2021) prepared by the London Borough of Lewisham (LBL), under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

Fifth State is a platform focused on delivering community-led workspace and residential offerings. Student resident well-being is at the heart of their model, and their buildings are designed and programmed to encourage a sharing and social ethos to help combat loneliness and mental health issues, which can be prevalent in large cities like London. Fifth State is promoting 5-9 Creekside, Deptford for employment-led mixed use redevelopment, incorporating the co-location of student accommodation.

Having reviewed the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents, and attended the online engagement event focused on the North Area (held by LBL on 15 March), this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 16 Lower Creekside Locally Significant Industrial Site).

The Owners and Developer support the vision for Lewisham as set out in the draft Local Plan, in particular that Lewisham will continue to be a dynamic place which supports local businesses, arts and cultural establishments, and where people thrive. The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.

We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council during the next round of consultation on the Local Plan.

## **Context of the Representation (5-9 Creekside)**

This section summarises the site and surrounding area and outlines the emerging scheme proposals at 5-9 Creekside.

### ***Site and Surrounding Area***

The site comprises an existing two storey building / part warehouse and servicing yard. The buildings are currently occupied by a wholesale alcohol distributor and cash and carry (Use Class B8) and artist studios (Use Class E). The total existing floorspace is 2,460 sqm.

5-9 Creekside is bound to the east and south by Creekside Road. The northern boundary backs on to the Crossfields Estate and to the west of the site is 3 Creekside which comprises the Medina Works building which accommodates a mix of art gallery, studios and creative workspaces.

The wider Deptford Creekside area is undergoing change, with nearby developments including The Fuel Tank employment space managed by Workspace, mixed-use commercial and residential developments at Kent Wharf, Sun Wharf and Faircharm Dock and the Trinity Laban Conservatoire of Music and Dance. 1 Creekside has received planning permission for an 8 storey building which will deliver 56 homes and 1,541 sqm of commercial space. In addition 2 and 3 Creekside are also going through the pre-application process and we are working collaboratively to develop the emerging proposals for all three sites.

### ***Emerging Development Proposals***

Fifth State are currently holding pre-application discussions with planning officers at LBL regarding the emerging proposals at 5-9 Creekside. The emerging scheme proposals seek to respond to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area.

The key principles of the emerging design include:

- Demolition of existing buildings to create replacement workspace on site which is being designed to respond to local market demand for employment space such as light industrial or creative industries and create an overall increase in jobs;
- Delivering an employment-led mixed-use development including the introduction of co-location of student accommodation;
- Providing high quality student accommodation and complementary facilities which are suitable with the continued employment operation of the site;
- Working collaboratively with neighbouring landowners to develop a comprehensive design approach to the regeneration of the area; and
- Responding positively to the Deptford Creekside Conservation Area.

The above principles have been underpinned by the relevant technical and environmental assessments.

## **Comments on Local Plan Main Issues and Preferred Approaches Document**

A series of comments are provided below in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document which are of relevance to the proposed redevelopment of 5-9 Creekside. Proposed policy changes or requests for amendments are underlined in the paragraphs below.

### ***Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)***

The Owners and Developer of 5-9 Creekside strongly support the strategy to deliver an Open Lewisham as set out in draft Policy OL1. Ensuring that the growth and regeneration potential of Lewisham's Opportunity Areas, including Deptford Creek / Greenwich Riverside, are fully realised (part a), and promoting the optimisation and intensification of Strategic Sites (Part F) will ensure that development potential is able to be maximised and will encourage the most efficient use of land, in line with paragraph 122 of the NPPF. Fifth State also support Part G of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.

### ***Draft Policy QD1 - Delivering high quality design in Lewisham***

Whilst the Owners and Developer of 5-9 Creekside support, in principle, the draft policy which advocates a design-led approach to development, it is considered that in order to reflect London Plan Policy D3 (optimising site capacity through the design-led approach), further text should be added which positively promotes optimising the capacity of sites, including site allocations, providing policy support for higher density developments in well connected locations. In our view, the proposed amends would ensure the policy is consistent with national and strategic policy and would subsequently enable the delivery of sustainable development in accordance with the NPPF and London Plan.

### ***Draft Policy QD4 - Building heights***

Figure 5.1 identifies locations which are suitable for tall buildings. The Owners and Developer of 5-9 Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position within the Deptford Creek / Greenwich Riverside Opportunity Area.

Part C of the draft policy refers to criteria QD4.B(e) – QD4.B(f) however there is no criterion B(f) and so further clarification is required to ensure Part C aligns with the relevant sections of Part B.

We consider that Part D of the policy which defines what a tall building is in specific localities aligns with London Plan Policy D9 Part A and is supported.

Part F of the draft policy lists assessment criteria for tall buildings, with F(c) referring to heights being sensitive to the site's immediate and wider context. We consider that this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall

buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised. This will ensure the most efficient use of land in these locations, such as Deptford Creekside.

#### **Draft Policy QD6 – Optimising site capacity**

The Owners and Developer of 5-9 Creekside support draft Policy QD6 which requires a design-led approach to be taken to optimise site capacity and establish an appropriate development density. This is considered to broadly align with London Plan Policy D3, however further advocacy of delivering higher density developments in appropriate locations should also be incorporated into this policy. Paragraph 5.46 of the draft Local Plan states that the policy seeks to ensure that *‘the limited supply of land is used effectively and efficiently [...] in order to meet the Borough’s future needs and to support the delivery of the spatial strategy, it will be necessary to facilitate higher density development in appropriate locations’*. As such, support for higher density development should be explicitly expressed within the policy wording itself.

In addition, it would be helpful if draft Policy QD6 could explain that the indicative development capacity figures proposed as part of all the draft Site Allocations are not intended to be a cap on development quantum, rather a broad indication of capacity. The policy wording should therefore state that the overall quantum will therefore be established through a design led approach to development to make most efficient use of land (in line with NPPF paragraph 122).

#### **Draft Policy HE1 – Lewisham’s historic environment**

The Owners and Developer of 5-9 Creekside support the thrust of draft Policy HE1 which seeks to preserve or enhance Lewisham’s historic environment. Part B of the policy provides a simplified version of the assessment of potential impacts from the key heritage tests outlined in NPPF paragraphs 193 to 197, which will be the relevant tests against which planning decisions will be made should the proposed development lead to either substantial or less than substantial harm. The policy therefore aligns with the national and strategic framework and we have no further comment to make at this time.

#### **Draft Policy HE2 – Designated heritage assets**

We recognise that Conservation Areas are subject to statutory protection under Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that *‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’*. The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements.

Part E of draft Policy HE2 states that *‘the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted’*. Fifth State do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed.



The impact of development proposals on a conservation area must take into account the development proposals as a whole, i.e. the impact of demolition as well as the impact of the replacement proposals (as established through *Dorothy Bohm v SSCLG* (2017)). Even in cases where the building or feature proposed to be demolished is identified as making a positive contribution to the area, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit. As such it is suggested that Part E of the policy is rephrased to better reflect the relevant heritage tests, as set out below:

*'Buildings or structures that have been identified to make a positive contribution to the character or appearance of the conservation area should be retained wherever possible, and where buildings and structures are proposed to be demolished the impacts of the demolition should be balanced against the impacts of the replacement proposals.'*

### **Draft Policy HE3 – Non-designated heritage assets**

The Owners and Developer of 5-9 Creekside note that the wording of draft Policy HE3 Part A which identifies that *'development proposals will be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset's setting'* goes beyond the NPPF Paragraph 197 test which states that *'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*. As outlined in our comments above, it will be necessary for a balancing exercise to take place to assess the impact of the loss of a designated or non-designated heritage assets which must be considered against the replacement development proposal, as well any public benefits which arise from the development proposals.

We consider that Part B of draft Policy HE3 should be redrafted to reflect Paragraph 197 of the NPPF, which requires a balanced judgement to be taken (rather than specifically looking to preserve or enhance the significance of a non-designated heritage asset).

### **Draft Policy HO8 – Purpose built student accommodation**

The NPPF Paragraph 11 requires that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and b) that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. NPPF Paragraph 61 goes on to state that *'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including [...] students).'*

London Plan Policy H15 considers purpose-built student accommodation (PBSA) and requires Boroughs to ensure that local and strategic need for PBSA is addressed. The overall strategic requirement for PBSA in London is for 3,500 bed spaces to be provided annually over the plan period. Borough level targets for PBSA bed spaces are not provided as it is acknowledged that the location of need will vary over the plan period in line with higher education institution growth and expansion plans, together with the availability of appropriate sites.

The Draft Local Plan is underpinned by the Lewisham Strategic Housing Market Assessment (2019) which considers the need for different types of accommodation and affordable housing needs drawing on demographic data and information provided from LBL and stakeholder consultation.

The main finding in respect of student housing is that *'there is a significant student population in Lewisham that is partly housed in the private rented sector. The future housing requirements for this group is uncertain due to global economic issues and Brexit. Whilst pressure on the private rented sector from students has been mitigated by purpose built student housing, the sector will continue to be subject to extreme levels of demand from students unable to afford purpose built housing and the growing trend of non-student households being able to afford home ownership and being ineligible for social housing.'* The recommendation goes on to state that 35% of student housing should be provided as affordable units to help meet the needs of students.

Whilst the SHMA provides an overview of student accommodation provided at Goldsmiths University and the University of Greenwich, no conclusion is drawn on the need for the delivery of PBSA in Lewisham. The SHMA acknowledges that there will continue to be pressure on the private rented sector to accommodate students, but does not identify how much PBSA is needed to address future need and demand. As such we question whether the NPPF requirement to objectively assess need for student housing has been adequately fulfilled by this assessment. As such, we would recommend transparency around student housing need is provided within the Draft Local Plan.

Notwithstanding concerns regarding the evidence base, draft Policy HO8 provides a supportive basis for assessing development proposals for PBSA. The policy wording broadly reflects London Plan Policy H15 requirements for PBSA, which Fifth State endorses.

Supporting paragraph 7.7 recognises that Lewisham is home to a number of further and higher education providers, particularly in north Lewisham which is home to Goldsmiths College, Trinity Laban Conservatory of Music and Dance and Lewisham College, as well as the nearby Greenwich University. As such it is considered that applications for PBSA coming forward in the north of the borough will be able to satisfactorily demonstrate that they will help to meet an identified strategic need for student accommodation (meeting policy requirement HO8 Part A(a)).

Fifth State acknowledge that the Borough's main strategic requirement is for genuinely affordable, conventional housing, and that PBSA will be counted as delivering homes against the Borough's strategic housing target and will be counted on a 2.5:1 basis (i.e. two and half PBSA bedrooms to one unit of conventional housing).

In respect of affordable student housing, Fifth State note that the London Plan policy (now H15) will be applied, which requires 35% affordable student accommodation in order to meet the Fast Track Route. Where this affordable target is not met, applications must follow the Viability Tested Route. However, paragraph 7.80 of the draft Local Plan states that *'at least 35% of PBSA should be secured as affordable housing'* but does not provide any further guidance on circumstances where 35% affordable student accommodation is not proposed. We request that this sentence is amended to read:

*'London Plan Policy H15 provides that at least 35% of PBSA should be secured as affordable housing in order to follow the Fast Track Route (whereby no financial viability assessment is required to be submitted with the application). Should the proposals not meet the threshold of 35% affordable housing, applications must follow the viability tested route.'*

***Draft Policy EC1 – A thriving and inclusive local economy***

Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Fifth State.

***Draft Policy EC2 – Protecting employment sites and delivering new workspace***

Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's *'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.'*

Whilst forecast need has been identified for 21,800 sqm of net additional employment floorspace, it is noted that this refers to previous Use Class B1. This has since been replaced by Use Class E(g) (Use Classes Order 1987 as amended in September 2020). Draft Policy EC2 and the supporting text should be updated to reflect the latest use classes.

Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained *'ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process'*. The supporting explanatory text advises that safeguarding of employment land includes *'floorspace, yard space for operations and servicing space'*.

Whilst the Owners and Developer of 5-9 Creekside support the principle of intensifying employment development and the ability to co-locate employment uses alongside other uses, they do not agree with an approach which seeks to protect yard space. London Plan Policy E7 supports efficient use of employment land to create additional industrial capacity, whilst having regard to operational requirements (including servicing). Figure 6.2 of the London Plan illustrates how existing industrial sites with large areas of yard space can be intensified through appropriate development.

It is requested that the no net loss principle in draft Policy EC2 Part B(a) for floorspace and operational yard space is removed. This reflects the removal of the 'no net loss' approach from the draft London Plan E7, which has now been removed in the adopted version of the London Plan, which has been replaced for a requirement for intensification to provide additional capacity.

The provision of 'additional capacity' could relate to the provision of replacement or additional floorspace or indeed an increase in the number or jobs or improvements to the quality of the workspace proposed.

In respect of yard space, retention of existing yard space should not be sought as the delivery of necessary yard space and adequate servicing arrangements should be considered as part of the development proposals, depending on the type of employment space proposed (in line with draft

Policy EC3). The requirement for operational yard space varies between typology, use class and operator and to protect all operational yard space is overly restrictive and does not allow successful intensification of designated employment sites and also limits opportunities for co-location.

It is noted that the explanatory text to Policy EC3 refers to the no net loss principle and a 65% plot ratio benchmark for assessing industrial capacity. Again the reference to the 65% plot ratio has been removed from the adopted version of the London Plan (following direction from the Secretary of State) and so these references should also be omitted from the draft Local Plan as they are not in conformity with the adopted policy position.

### ***Draft Policy EC3 – Location and design of new workspace***

The Owners and Developer of 5-9 Creekside strongly support draft Policy EC3 which outlines a number of criteria to promote the delivery of high quality, flexible and suitable workspaces for micro, small and medium-sized businesses.

### ***Draft Policy EC4 – Providing suitable business space and affordable workspace***

The Owners and Developer of 5-9 Creekside broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace.

Part E of the draft Policy states that further details will be set out in the Council's Planning Obligations SPD. The supporting text states that *'affordable workspace is workspace that is provided at rents maintained below the market rate. This type of workspace is important to support business start-ups, particularly in the cultural and creative sectors'*.

As currently drafted there is no confirmation of the specific heads of terms or discount levels which are envisaged to be imposed through the Planning Obligations SPD to secure the provision of affordable workspace. As such a detailed response on the viability of such a requirement cannot be provided, but the principle of such a mechanism is supported. Fifth State request that the proposed affordable workspace discount is specified within this policy so that it can be appropriately viability tested at the plan making stage, as required by the NPPF.

Fifth State reserve the right to make further comment in relation to the specific heads of terms at the appropriate time.

### ***Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL***

The Owners and Developer of 5-9 Creekside have already provided commentary to draft Policy EC2 which requests that the principle of no net loss and the 65% plot ratio should be removed from the draft Local Plan, in order to be consistent with the adopted London Plan. Aside from this point, they broadly support the aims of draft Policy EC5 which supports the co-location of employment and other compatible uses at selected LSIS locations (including Lower Creekside).

Part E of the draft Policy refers to LSIS listed in Part B; this should be corrected to Part C which provides the list of LSIS sites where co-location is supported.

Part E states that where proposals come forward on LSIS co-location sites where an approved site-wide masterplan is not in place, Criteria in Parts F and G of the policy will apply. Part F(a) of this policy states that residential uses would not be supported, which conflicts with the proposed Site Allocation 16 (discussed later in this representation) which identifies that residential uses are considered to be compatible and suitable as part of a co-location scheme at Lower Creekside.

The explanatory text on page 266 states that proposals for non-employment uses in LSIS would be resisted if a site wide masterplan has not been agreed or approved because the Council want to *'ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses'*. This approach is contrary to the aspirations of the London Plan, which states at Policy E7 that *'Development Plans and development proposals should be proactive and encourage the intensification of business uses, inter alia.'* Further, Part D of Policy E7 sets out the principles for which developments proposing the co-location of uses must consider.

We are of the view that it is unreasonable to restrict the principle of delivering residential uses within LSIS co-location schemes in the absence of a site wide masterplan being in place. Whilst we are working with adjacent land owners at 2 and 3 Creekside, this imposes a harmful policy control which is contrary to good planning practices. Notwithstanding this, where a number of sites are being brought forward as part of the wider regeneration of an area which include co-locating factors, the requirement for comprehensive masterplanning may be compromised by land ownerships etc. and ultimately delay the delivery of much needed accommodation, both employment and residential for the borough.

As such we request that draft Policy EC5 acknowledges that a masterplan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation, which we consider will satisfy London Plan Policy E7 (as the co-location proposed is being planned). As such draft Policy EC5 Part E should be removed.

We consider that the requirement for quality design and placemaking principles are already secured via the relevant draft policies contained in Chapter 5 of the draft Lewisham Local Plan and would therefore request that Part F(a) is removed.

Within the explanatory text on page 266, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that *'proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element'*. Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).

### **Draft Policy SD2 - Sustainable Design**

Part D of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM 'Excellent' rating. At present this wording does not allow for any site specific technical constraints which may mean that an 'Excellent' rating cannot be achieved. We therefore request that the policy wording is amended to seek to achieve (rather than require) developments to

achieve an 'Excellent' rating, with appropriate justification to be provided at planning application to explain the rating that is possible for the development to meet.

### **Comments on Lewisham's North Area**

#### ***Draft North Area Vision and Spatial Objectives***

The Council's vision for Lewisham North Area is strongly supported by the Owners and Developer of 5-9 Creekside. The vision re-imagines Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood. In addition the Creative Enterprise Zone will cement Lewisham's position as a leader in the creative and cultural industries which will feature modern and affordable workspace, including artist studio space, building on the presence of Goldsmith's College, Trinity Laban and Albany Theatre. The objective to establish a Creative Enterprise Zone at Deptford Creekside fits well with the development aspirations Fifth State have for 5-9 Creekside.

We note that Lower Creekside (Site Allocation 16) is incorrectly labelled as a Strategic Industrial Location in Figure 15.2. This should be amended to reflect the correct designation: Locally Significant Industrial Site.

#### ***Draft Policy LNA1 - North Area place principles***

The Owners and Developer of 5-9 Creekside support Part A of the draft policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries. Whilst Fifth State agree that heritage-led regeneration will be important within the North Area, particularly for areas identified in Part E(a) to (c) (including Royal Naval Dockyard, Grand Surry Canal and Deptford High Street and New Cross High Street), where sites are identified to accommodate growth to support the Council's objectively assessed needs, heritage considerations must be considered alongside public benefits as part of the overall planning balance (this has already been mentioned in response to draft Policies HE2 and HE3).

#### ***Draft Policy LNA3 - Creative Enterprise Zone***

The creation of a new Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Owners and Developer of 5-9 Creekside.

### **Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site)**

The following sections assess the soundness of the draft Site Allocation 16 in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy. A copy of draft Site Allocation 16 is provided at Appendix I.

***Site Allocation (Indicative Development Capacity)***

Site Allocation 16 comprises a number of development sites along Lower Creekside, including 5-9 Creekside which is bound by the road to the south and east.

The summary page identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 160 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan (which was not consulted on).

The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested.

Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. We consider that in accordance with the SHLAA density assumptions, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 homes (within an Urban location). Whilst we acknowledge that there are heritage sensitivities within Lower Creekside, we consider that the indicative development capacity of 160 new homes is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation.

This position is evidenced through pre-application design development at 5-9 Creekside and neighbouring 2 and 3 Creekside sites which indicates that the site allocation may have a greater site capacity, taking into account heritage, townscape, environmental and technical considerations. In addition given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design led approach.

As such it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.

***Site Allocation (paragraph 15.88)***

The site is allocated for comprehensive employment led redevelopment. Co-location of compatible commercial, residential and complementary uses are supported within the current drafting. Fifth State request that the proposed co-location uses also include PBSA, which is considered to be suitable in this location, subject to complying with London Plan Policy H15 and draft Local Plan Policy HO8.

***Opportunities (paragraph 15.89)***

The Owners and Developer of 5-9 Creekside support the opportunities provided in draft paragraph 15.89, but also consider that reference to the site being located in the Deptford Creek / Greenwich Riverside Opportunity Area should also be acknowledged, as this is envisaged to provide new jobs and homes through the plan period.

***Development requirements (paragraph 15.90)***

The Owners and Developer of 5-9 Creekside support the development requirements to not reduce industrial capacity or compromise the functional integrity of the employment location. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation.

We do however question the requirement that development must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. We suggest that this point is altered to state that designs for individual sites should demonstrate that they have been co-ordinated with neighbours. The principle of mixed use development on the sites is already secured via the Site Allocation, and we consider the nature of the area and existing uses does not require a masterplan to be approved in order for the aspirations of the site allocation to be realised.

***Development guidelines (paragraph 15.91)***

We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses.

Fifth State consider the 5-9 Creekside site is suitable to accommodate new workspace including artist studios and other SME accommodation.

We understand that building heights will need to be designed having regard to designated and non-designated heritage assets, including St Paul's Church, Deptford Church Street, the Crossfields Estate and the Deptford Creek Conservation Area (and as such will be assessed against the relevant heritage legislation and policies as considered in further detail earlier in this letter).

We support that new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR. We request that the development currently under construction at 1 Creekside (which forms part of the site allocation) is also added to the list of buildings which should be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 16, including height and massing.

***Summary***

The Owners and Developer of 5-9 Creekside are supportive of the draft allocation as a whole, however we request that PBSA is included within the proposed development uses. Notwithstanding this and based on our current assessment, we consider that the proposed



indicative site capacity may be overly restrictive and so we question whether the allocation has been positively prepared in accordance with the requirements of the NPPF. We consider that the indicative site capacity is not supported by proportionate evidence and therefore does not seek to meet the area's objectively assessed needs. Indeed the design work that is currently being prepared by Fifth State in conjunction with other landowners and development plots adjacent to 5-9 confirms that the overall capacity of Lower Creekside has potential to be higher than proposed in the policy wording. We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound. We reserve the right to make further comments in relation to the policy allocation at the next available opportunity.

### **Next Steps**

We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan. The Owners and Developer of 5-9 Creekside are very keen to engage with LBL and wish to continue to be involved in subsequent consultations.

Please do not hesitate to contact Rachel Crick or Kate Green ([kate.green@avisonyoung.com](mailto:kate.green@avisonyoung.com)) at Avison Young should you wish to discuss any of the points raised above.

Yours sincerely



**Rachel Crick**  
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**[rachel.crick@avisonyoung.com](mailto:rachel.crick@avisonyoung.com)**

**For and on behalf of Avison Young (UK) Limited**

24 April 2023

Local Plan  
Lewisham Planning Policy Team  
London Borough of Lewisham  
Laurence House  
1 Catford Rd, Catford  
London, SE6 4RU



Via email only: [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

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Dear Sir / Madam

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**LEWISHAM LOCAL PLAN REGULATION 19 CONSULTATION:  
PROPOSED SUBMISSION DOCUMENT (JANUARY 2023)**

savills.com

**REPRESENTATIONS SUBMITTED ON BEHALF OF BELLWAY HOMES LTD AND PEABODY DEVELOPMENTS LTD**

We are instructed by our clients – Bellway Homes Ltd (“Bellway”) and Peabody Developments Ltd (“Peabody”) to submit representations to the following document: “*Lewisham Local Plan. An Open Lewisham as part of an Open London. Proposed submission document – Regulation 19 stage*” dated January 2023 (“the draft Local Plan”) in the context of their land ownership and planning application at Sun Wharf, Creekside, Deptford, London, SE8 3DZ (“the site”), located within the London Borough of Lewisham (LBL).

These representations relate to the site at Sun Wharf which forms part of the proposed site allocation ‘**18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches)**’ within the draft Local Plan. The site is outlined in red in the attached site plan (Drawing No. 3336A-PL(90)\_00\_P01). These representations also relate to the wider policies of the draft Local Plan.

The site has significant redevelopment potential and we strongly support the principle of the site allocation and the principle of development to deliver a mixed use redevelopment comprising new residential uses, including affordable housing and provision of high quality employment uses. We have set out our detailed comments in this letter.

This letter should be read in conjunction with the previous representations (letter dated 09 April 2021) submitted to the Council in response to the Lewisham Local Plan Regulation 18 ‘Main Issues and Preferred Approaches Document’ January 2021 and representations (letter dated 10 June 2022) submitted to the Council in response to “Lewisham Tall Buildings Study Addendum” May 2022.

**Background**

*Bellway Homes Ltd and Peabody Developments Ltd*

Bellway is a major national house-builder, with considerable expertise in delivering homes that people want to live in. Bellway is committed to developing the site who have a track record of working in some of London’s key regeneration areas. Bellway has delivered high quality mixed use redevelopment schemes within London and the South East. Bellway has established a particularly strong track record in London and deliver over 2,500 units per year across four divisions. Bellway Thames Gateway alone currently has over 30 active development sites. Whilst many in the development sector have been in financial difficulty in recent years, Bellway have emerged as a strong and well-run business with low debt.

Peabody Developments Ltd are a wholly owned subsidiary of Peabody Trust. Peabody are a not for profit housing association who provide over 104,000 homes and services to 220,000 residents across London and the Home Counties. Peabody also provide care and support services for around 20,000 customers. Peabody are committed to making sure our homes are affordable and comfortable for everyone. Peabody keep rents low and aim to provide our communities with services and support that give everyone a platform to succeed.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Bellway and Peabody formed a joint venture partnership to deliver the proposed redevelopment scheme at Sun Wharf.

### *Site and Surroundings*

The site measures approximately 0.73 hectares and is located in the northern part of Deptford. The site accommodates existing low-rise warehouse buildings currently in commercial use.

The site is bound by Creekside (a local vehicle carriageway) and Cockpit Arts (a creative industries business incubator) to the west, railway arches to the south, Deptford Creek to the east, and Kent Wharf to the north. Kent Wharf is a mixed use scheme, also redeveloped by Bellway that has been completed and comprises 143 residential units and circa 1,300sqm of commercial floorspace.

The site predominantly has a Public Transport Accessibility Level (PTAL) rating between 3 and 4 (moderate to good). However the site is better than the standard PTAL rating suggests since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services.

The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 3, within an area benefiting from flood defences.

### *Planning Policy Context*

The site is subject to the following key adopted (current) planning policy designations:

- Part of Site Allocation SA11 "Sun and Kent Wharf Mixed use Employment Location";
- Deptford Creek/Greenwich Riverside Opportunity Area as designated by the London Plan;
- Deptford and New Cross Creative Enterprise Zone as designated by the London Plan;
- Deptford Creekside Regeneration and Growth Area;
- Air Quality Management Area; and
- Archaeological Priority Area.

### *Current Planning Application*

Bellway and Peabody submitted a full planning application (ref: DC/20/118229) for a residential-led, mixed use redevelopment at Sun Wharf proposing 220 homes and creative industry commercial uses together with the delivery of new public realm, play space and landscaping which would deliver on a range of planning and public benefits, including 39% affordable housing (by habitable room) and affordable workspace. The description of development is as follows:

*"Demolition of all existing buildings and comprehensive redevelopment to provide 3 new buildings ranging in heights of 3 to 19 storeys to provide 220 residential units (C3 Use Class) and 1,132 sqm of commercial floorspace (Use Class E) plus 311sqm of commercial floorspace (Use Class E) in a container building, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas, public realm, improvements to river wall and public riverside walkway and associated works.*

On 1 September 2022, LBL's Strategic Planning Committee resolved to grant planning permission. On 3 April 2023, the Mayor of London issued his Stage 2 referral (planning report 2020/6879/S2) stating that the application is acceptable in strategic planning terms and there are no sound planning reasons for the Mayor to intervene in this case, recommending LBL determine the case itself. A decision notice and Section 106 is due to be formally issued imminently.

### **National Planning Policy Context**

Paragraph 35 of the NPPF (National Planning Policy Framework) (2021) states that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.

### **Lewisham Draft Local Plan (Regulation 19) – dated January 2023**

We note that the key principles of the adopted Site Allocation is being carried over to the draft Site Allocation as set out in the draft Local Plan. We note the site is subject to the following key draft planning policy designations:

- Site Allocation 18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches);
- Deptford Creek/Greenwich Riverside Opportunity Area (as designated by the London Plan);
- Appropriate Location for Tall Buildings (Deptford Creekside tall building suitability zone);
- Mixed-Use Employment Location;
- Deptford and New Cross Creative Enterprise Zone (as designated by the London Plan);
- Deptford Creekside Cultural Quarter;
- Waterlink Way;
- Archaeological Priority Area;
- Air Quality Management Area; and
- Flood Zone 3.

Having regards to the national planning context in preparing Local Plans, we have commented on the draft Local Plan, as explained below. For any specific suggested amendments, this is shown via a box, with the relevant reference to the draft Local Plan accordingly, as follows:

*Suggested amendments to draft Local Plan re: [reference inserted]*

Deletions shown as ~~strikethrough text in red~~; and  
Additions shown as underlined text in green.

**Draft Site Allocation 18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches) (“draft Site Allocation 18”)**

Fundamentally, our Client fully supports the principle of re-development for residential and employment/commercial uses as part of the draft Site Allocation 18 (pp588-591). However, further corrections, clarifications and updates are required, as set out below.

Compared to the adopted Site Allocation (SA11), we note that the draft Site Allocation boundary has been amended to omit Kent Wharf. We have concluded this is likely to be because Kent Wharf has been redeveloped (by Bellway) and is now completed and occupied. We note that the updated boundary for the draft Site Allocation therefore includes the remaining land parcels: the Site (i.e. Sun Wharf), as well as the adjacent Cockpit Arts site and Network Rail Arches. The site address should be updated to include “*Sun Wharf*” as noted below.

However, it is fundamental that the draft Site Allocation have regard to the masterplan that was developed and approved as part of the Kent Wharf planning application i.e. the Indicative Masterplan document approved as per condition 2 (ref: DC/14/89953 dated 17 June 2015). This approved masterplan was in relation to the Kent Wharf, Sun Wharf, Cockpit Arts and Network Rail Arches land parcels. Kent Wharf was therefore the first phase, with Sun Wharf now forming the second phase of the development, and Cockpit Arts and Network Rail Arches as the future subsequent phases. Therefore, the draft Site Allocation should be updated to reference this approved masterplan as noted below.

As part of the “*Indicative Development Capacity*” section of the draft Local Plan, we note that it states 220 net residential units and 1,443 gross non-residential floorspace (p588) makes it clear the latter is gross floorspace sqm). It is also noted these figures reflect the current submitted application which have been developed via a design-led approach. We note that para 13.8 (p437) states these site capacities are indicative only with the optimal capacity established on a case by case basis – which we support. Table 13.1 (p437) provides the indicative delivery number for all site allocations over the 20 year plan period, which includes homes (net units). **However, we consider that the drafting should be further refined to make it explicit that the figure for the residential units is a minimum requirement, and indeed a only the starting point**, as noted further below.

This would ensure that the draft Local Plan is **effective** in its delivery of new homes, as well as affordable homes.

We note that the PTAL states between 0 to 3. However, LBL’s Strategic Planning Committee report in relation to the Sun Wharf planning application (ref: DC/20/118229) confirms the PTAL is 3 to 4 (paras 43, 163 and 465). Fundamentally the site has a better than the standard PTAL rating, since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services and also the Deptford Town Centre. Therefore, we would consider the text in the draft Local Plan should be updated to “*PTAL 3 to 4*” as noted below. This would ensure it is **consistent** and factually correct.

*Suggested amendments to draft Local Plan re:  
Site Allocation 18, table on p588*

**SITE ADDRESS:** “Cockpit Arts Centre, 18-2 2 Creekside, [Sun Wharf](#) London SE8 3DZ

**PTAL**

2015:	<del>0-3</del>	<u>3-4</u>
2021:	<del>0-3</del>	<u>3-4</u>
2031:	<del>0-3</del>	<u>3-4</u>

For the reasons explained above, under the sub-heading **Development requirements** (para 15.105) part 1 should be updated as follows:

*Suggested amendments to draft Local Plan re:  
Site Allocation 18, para 15.105, **Development requirements**, No.1 (p589)*

Landowners should work in partnership and development must be delivered to ensure coordination, phasing and balance of uses across the site including the Cockpit Arts Centre and Sun Wharf parcels of land, in line with Policy DM3 (Masterplans and comprehensive development), and having regards to the approved Indicative Masterplan document (Kent Wharf, Condition 2 Planning Permission, ref: DC/14/89953 dated 17 June 2015).

Under the sub-heading **Development requirements** (para 15.105) we note that part 5 states that: “*The site [i.e. site allocation] must be fully re-integrated with the surrounding street network to improve access [sic] and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creekside.*”

Both of these cycle routes fall outside of, and have an extensive reach beyond the site, and the draft Site Allocation boundary. Whilst the principle of improved access to these cycleway routes is generally supported, it is unreasonable to require a draft site allocation “*to facilitate the delivery*” of both these cycleways, and would **not be effective** and **would not be justified**, contrary to the NPPF. The appropriate planning mechanism in which to address the relevant planning obligations is applying the relevant statutory tests set out in Regulation 122<sup>1</sup>. We would therefore suggest the following amendments which would seek to promote future redevelopment to be designed so that they promote connections with the surrounding street network, including the cycleways:

*Suggested amendments to draft Local Plan re:  
Site Allocation 18, para 15.105, **Development requirements**, No.5 (p589)*

~~The site must be fully re-integrated with the surrounding street network to improve access [sic] and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creekside.~~

The design of development proposals should seek to promote appropriate connections to the surrounding street network, including potential connections to Cycleway 10 (which runs over Ha’penny Bridge) and Cycleway 35 (running along Creekside).

Under the sub-heading **Development requirements** (para 15.105) we note that part 8 refers to protecting and enhancing green infrastructure relating and this is supported in principle. However, this must be balanced against the Environment Agency requirements and the need to protect against flood risk. We therefore suggest this is made explicit, as per the suggestion below.

*Suggested amendments to draft Local Plan re:  
Site Allocation 18, para 15.105, **Development requirements**, No.8 (p590)*

*Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park – and balanced against any requirements from Environment Agency needed to mitigate against flood risk.*

<sup>1</sup> The Community Infrastructure Levy Regulations 2010 (as amended)

Under the sub-heading **Development guidelines** (para 15.106) we note that part 5, support the principle of tall buildings. As it relates to the text that tall building elements should be located to the south east corner of the site marking the junction of Creek and the railway viaduct, whilst this is reflective of the current planning application it is considered that the policy text is overly prescriptive and should be amended to ensure it is more flexibly drafted i.e. it should simply say that tall buildings and their precise location will be a design-led approach. This will ensure there is sufficient flexibility in the publication Local Plan and that the site is deliverable, and would therefore be **effective**.

*Suggested amendments to draft Local Plan re:  
Site Allocation 18, para 15.106, **Development guidelines**, No.5 (p590)*

*The potential for taller building elements to reflect the surroundings should be considered as part of a design led approach, and should ensure minimal impact on the Grade II listed railway viaduct and the Lifting Bridge Structure as well as the setting of the Grade I Listed St Paul's Church in Deptford and the LVMF panoramic view from Blackheath Point. ~~The precise location for taller elements should be~~ informed by a design-led approach located in the south eastern corner of the site, marking the junction of Creek and the railway viaduct.*

Under the sub-heading **Development guidelines** (para 15.106) we note that part 6, there is reference the safeguarded Brewery Wharf. We note that LBL's Strategic Planning Committee report (dated 1 September 2022) in relation to the Sun Wharf planning application (ref: DC/20/118229) did not view the site being in 'close proximity' to Brewery Wharf as the report (para 243 p41) states 'the development site lies some distance away from Brewery Wharf' with the Wharf located approximately 285m to the north east of the application site. Therefore, we consider that drafting be amended as follows.

*Suggested amendments to draft Local Plan re:  
Site Allocation 18, para 15.106, **Development guidelines**, No.6 (p590)*

*~~The proposed residential development located in close proximity to the~~ Regard should be had to the safeguarded Brewery Wharf (located approximately 285m to the north east of the site), and proposed residential development should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.*

In summary, the suggested changes to the draft Site Allocation would ensure there is sufficient flexibility and that the site is **deliverable**, and would therefore be **effective**.

### **Draft Policy EC7 Mixed-use Employment Locations (MEL)**

Our Client supports the principle mixed use redevelopment of MELs and Site Allocations within MELs through the masterplan process as outlined in Part A and Part B. However, the policy should make a more explicit reference to residential uses to be included as part of regeneration, as noted below.

We note Part C of the draft policy seeks the long term protection of industrial capacity on MELs, ensuring there is no net loss of existing industrial capacity.

This is not consistent with London Plan Policy E4 (Land for industry, logistics and services to support London's economic function) as Part C of that policy states 'the retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B [of London Plan Policy E4]

should be planned, monitored and managed'. Whilst the site vacancy is scored as low in the Lewisham Employment Land Study (2019) with regard to Sun and Kent Wharf it states at para (5.60 p 51) "If the current occupiers vacate the site it may be difficult to find a new occupier due to the constrained nature of the access and poor site coverage". The policy as its currently drafted does not allow for the site to be managed effectively to address possible vacancy issues in the future. Additionally, para 22 of the NPPF states that long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for allocated employment uses. Therefore, it would not be reasonable to include this, and should be omitted. We therefore suggest the following amendments:

*Suggested amendments to draft Local Plan re:  
EC7 Mixed-use Employment Locations (MEL), Parts A and C, p233*

*A. The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration (which may include residential uses) and to secure provision for a range of commercial uses, including new modern workspace with priority given to Class E(g) office and light industrial uses. All development proposals within MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals must provide demonstrable improvements in the overall physical and environmental quality of the MEL and ensure that new development is well integrated with adjoining and neighbouring land uses.*

*[...]*

~~*C. Where the comprehensive development of an MEL, or a site within the MEL, has been delivered through the masterplan process all future proposals involving the redevelopment or change of use of land and floorspace must:*~~

- ~~*a. Retain, and wherever possible seek to increase, the proportion of industrial capacity across the MEL, as originally approved in the masterplan and planning consent; and*~~
- ~~*b. Ensure there is no net loss of existing industrial capacity.*~~

Making these changes would ensure that the draft Local Plan is **consistent** with regional and national policy and **effective** in its delivery.

**Draft Policy HO1 Meeting Lewisham’s Housing Needs; and  
Draft Appendix 6 Housing Trajectory and Give Year Housing Land Supply**

Our Client is fully supportive of Site Allocation 18 providing new homes (C3).

Our Client fully supports Policy HO1, noting the relevant reference to the London Plan Table 4.1 which sets out a minimum 10 year housing target for Lewisham. This sets out that the Council will ensure the London Plan ten year housing target is exceeded. It is important to note the Lewisham SHMA 2022 indicates (para 5.16 p 84) a higher housing need for Lewisham of 2,334 per annum over a 10 year period (2021 to 2031). This site represents a significant opportunity for mixed use development that can contribute towards housing provision and the above housing targets.

We also note an up to date housing trajectory and five year housing supply for the Borough with inclusion of Site Allocation 18. Sun Wharf is listed in North Area (No.18) with a site area of 1 hectare (we note this relates to the entire site allocation, not just Sun Wharf), noting that:

- For Year 4 (2026/27) 180 units would be delivered/completed; and
- For Year 5 (2027/28) 40 units would be delivered/completed.



Our Client fully supports Parts D, E and F that aim to provide a mix of unit sizes and housing choice on a case by case basis. We acknowledge Table 7.1 (Target unit size mix for affordable housing) which sets specific targets on affordable products to ensure stronger requirements for family housing.

Our Client is supportive of the need to deliver a range of housing types. We note that Lewisham's SHMA 2022 in (paragraph C.12 p 144) with regard to open-market housing outlines flexibility (to meet changing needs over time) as one of the current limitations of the housing market in Lewisham from surveyed stakeholders. Therefore, it is essential that an appropriate mix of housing is established on a case-by-case basis.

### **Draft Policy HO3 Genuinely Affordable Housing**

Our Client strongly advocates for the delivery of new affordable homes to meet Lewisham's housing requirements. We acknowledge and support the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, **subject to viability**.

We support Part F (Threshold approach to viability) and Part G (Viability Tested Route) that ensure conformity and consistency with the London Plan and the Affordable Housing and Viability Supplementary Planning Guidance. The site represents a key opportunity for the delivery of a mixed use redevelopment brought forward by our clients to contribute towards affordable housing.

We also note that Part K may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. Our Client is supportive of the need to deliver a range of housing types that promote inclusive and mixed communities and advocates for policies that adopt a flexible approach to housing mix. This will ensure that the draft Local Plan is effective and deliverable.

### **Draft Policy QD6 Optimising Site Capacity**

Our Client strongly supports a design-led approach to make the best use of land in order to optimise site capacity so as to deliver redevelopment and its associated planning and public benefits.

We also note Part C which aims to address concerns about indicative site development capacities on site allocations. Part C states "*Development parameters for specific sites are set out in this Local Plan (Part 3 – site allocations). Where development proposals do not accord with the indicative capacity set out in a site allocation policy they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above...*".

We consider that current drafting is confusing when read in conjunction with Part A and Part B of the policy – we question how a development proposal can comply with an "indicative capacity" – when capacity is indicative.

We therefore, Part C be further refined to make it clear that regard should be had to the indicative capacities. Furthermore, the indicative residential units should be considered as the minimum.

These suggested amendments are outlined as follows:

*Suggested amendments to draft Local Plan re:*

*QD6 Optimising site capacity, Part C, p103*

*A Development proposals must use the design led approach to make the best use of land and optimise the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham).*

*B To establish the optimum capacity of a site consideration must be given to the appropriate development density having regard to:*

- a. The type and nature of uses proposed;*
- b. The site context, with reference to the site's immediate and surrounding area, taking into account:
 
  - i. Location setting;*
  - ii. Local distinctiveness and character, including heritage assets, with consideration given to the prevailing and/or emerging form and proportion of development in the area;**
- c. Public Transport Access Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure; and*
- d. Capacity of infrastructure to support the land uses and density proposed, having regard to the individual and cumulative impacts of development.*

*C Development parameters for specific sites are set out in this Local Plan (Part 3 – site allocations). ~~Where~~ ~~d~~ Development proposals ~~should have regard to do not accord with~~ the indicative capacity set out in a site allocation policy, ~~and seek to achieve they will only be supported where it is clearly demonstrated~~ the optimal capacity ~~will be achieved~~, having regard to (A) and (B) above.*

#### **Draft Policy QD4 Building Heights; and Draft Schedule 12: Tall Building Suitability Zones**

Our Client fully supports Policy QD4 as this would contribute to the effective delivery of the site, which would contribute to LBL's regeneration objectives.

We also note Figure 5.1 (Tall Buildings suitability plan) and corresponding Figure 5.4 (Deptford Creekside tall building suitability zones) and Table 21.12 in Schedule 12 (Table showing Tall Building Suitability Zones) of the draft Local Plan proposes to designate "Sun Wharf Mixed-use Employment Location (including Network Rail Arches)" as an appropriate location for tall buildings – stating a maximum height of 20 storeys.

Whilst we fully support the principle of tall buildings and 20 storeys, the drafting is overly prescriptive and must be updated to ensure there is sufficient flexibility since the precise heights would be developed through a design-led approach. Therefore the text "maximum" should be replaced with "approximately".

#### **QD8 High Quality Housing Design**

Our Client fully supports a high quality design approach for development proposals as set out in Policy QD8.

The drafting of Part G relating to north-facing single aspect dwellings needs to be made clearer that it relates to specifically north-facing single aspect units.

The draft of Part E needs to be elaborated to take into the daylight and sunlight guidance set in the Mayor's Housing SPG (2016), specifically paras 1.3.45, 1.3.46 and 2.3.47.

The suggested amendments are set out in the table as follows:

<p><i>Suggested amendments to draft Local Plan re: QD8 High quality housing design, Part E and G, p111</i></p> <p><i>E. Development proposals for housing must be designed to protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity and agent of change). They must ensure adequate provision of natural light with reference to the latest Building Research Establishment (BRE) good practice guidance, currently BR209: Site layout planning for daylight and sunlight, or suitable equivalent. <u>The BRE Guidance and its quantitative results must be applied flexibly and sensitively and consider use of alternative targets for sites located in high density locations, town centres, part of phased development or part of a masterplan, taking into account the local circumstances, the need to optimise housing capacity.</u></i></p> <p><i>[...]</i></p> <p><i>G. Development proposals for housing must maximise the provision of dual aspect dwellings. Proposals for <u>north-facing</u> single aspect dwellings, <del>particularly north-facing dwellings</del> will be resisted and only be permitted where it can be suitably demonstrated that the development will provide a more appropriate design solution than a dual aspect dwelling, having particular regard to: [...]</i></p>
--

#### **Draft Policy EC4 Low Cost and Affordable Workspace**

We note the approach in para 8.24 that states “all major commercial development, including mixed-use developments with a commercial component of 1,000 square metres or more gross, must ensure that 10 per cent of new workspace is delivered as affordable workspace”.

Whilst our Client supports the approach that this would be subject to viability. With regard to the formula for affordable workspace payments in lieu set out in Table 8.2, this must also be subject to viability.

#### **Policy LNA1 Lewisham’s North Area Principles**

We support the principle of Policy LNA1 that seeks to ensure the North Area benefits from a high quality design-led regeneration to secure the long term vitality and vibrancy of the North Area.

#### **Draft Policy LNA3 Creative Enterprise Zone (CEZ)**

Our Client supports the principle of draft Policy LNA3 in the retention and provision of clusters of creative and cultural industries subject to viability and where there is a demand for a proposed use. We note reference to Use Class Order Class E and further clarifications in Part B(e) that designates a Cultural Quarter at Deptford Creekside with the objective of facilitating the creation of additional clusters, new high quality workspace and facilities.

#### **Draft Policy SD9 Lewisham’s Waterways**

Our Client supports in general Policy SD9 (Lewisham’s Waterways) that relates to water management and flood risk. We note Part A that states “Potential to facilitate water transport, for both passengers and freight”. This ensures redevelopments have sustainable methods of transport to the site. However, policy should state “subject to feasibility”.

As previously mentioned, we note the supporting text in paragraph 11.56 states prescriptive relief (set back distances) between new development and river frontages – unless otherwise agreed by the Council and Environment Agency, with buffer zones left free of permanent structures and integrated into a new development to enhance their amenity value. It states as follows:

*In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, **unless otherwise agreed by the Council and the Environment Agency**. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value...* (Our Emphasis.)

It is considered that the drafting of the policy is currently overly prescriptive and would unnecessarily constrain redevelopment. This would **not be effective** and could restrict the **delivery** of future redevelopment and any associated full benefits, including new homes, new affordable homes and new jobs. We consider that each site must be considered on its own merits and any relief (set back distance) between new development and the frontage to be agreed with the Council and the Environment Agency on a case-by-case basis, having regards to all relevant technical matters, site specific constraints and development that would be brought forward, including the overall planning and public benefits.

Whilst it is acknowledged that the current drafting includes the following text: “*unless otherwise agreed by the Council and the Environment Agency*” – and could potentially allow an alternative set back distance to be agreed with the Council and Environment Agency, we consider the policy should be updated as below. This would ensure that the policy is **effective** and **deliverable**.

*Suggested amendments to draft Local Plan re:  
SD9 Lewisham’s waterways, Part A, p111, p379 & para 11.56 (p382)*

*A Waterways provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:*

- a. Environmental function and ecological qualities;*
- b. Contribution to the Borough’s network of open spaces;*
- c. Recreational and amenity value;*
- d. Distinctive features that help to shape and reinforce the Borough’s physical, cultural and historical character;*
- e. Support for the visitor economy; and*
- f. Potential to facilitate water transport, for both passengers and freight, subject to feasibility.*

[...]

*Para 11.56 – In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief ~~of 8 metres~~ from a main river and ~~5 metres from~~ an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value. Development within 20 metres of a bank of a main river will need Environment Agency consent. Some rivers have defined flood defence assets and proposals will be required to identify assets and these into consideration, where appropriate.*

## **Draft Policy DM3 Masterplans and Comprehensive Development**

Our Client is supportive of Policy DM3 as masterplans play a key role in clarifying design, capacity and phasing of a site and ensure coordination between various stakeholders.

### **Public Examination**

On behalf of our Client we consider it is necessary we attend the oral part of the Examination in Public. We would be grateful if you could keep us updated.

### **Conclusion**

In summary, our Client supports the principle of the Site Allocation 18 for the redevelopment of the site which would provide significant public benefits including employment and new housing. With the suggested amendments we consider that the draft Local Plan would be sound.

However, some of the items noted above in their current form would constrain potential redevelopment options and would therefore, **not be effective** in their **delivery** and would **not be consistent** with national policy. Therefore, it is considered that the draft Local Plan is not sound.

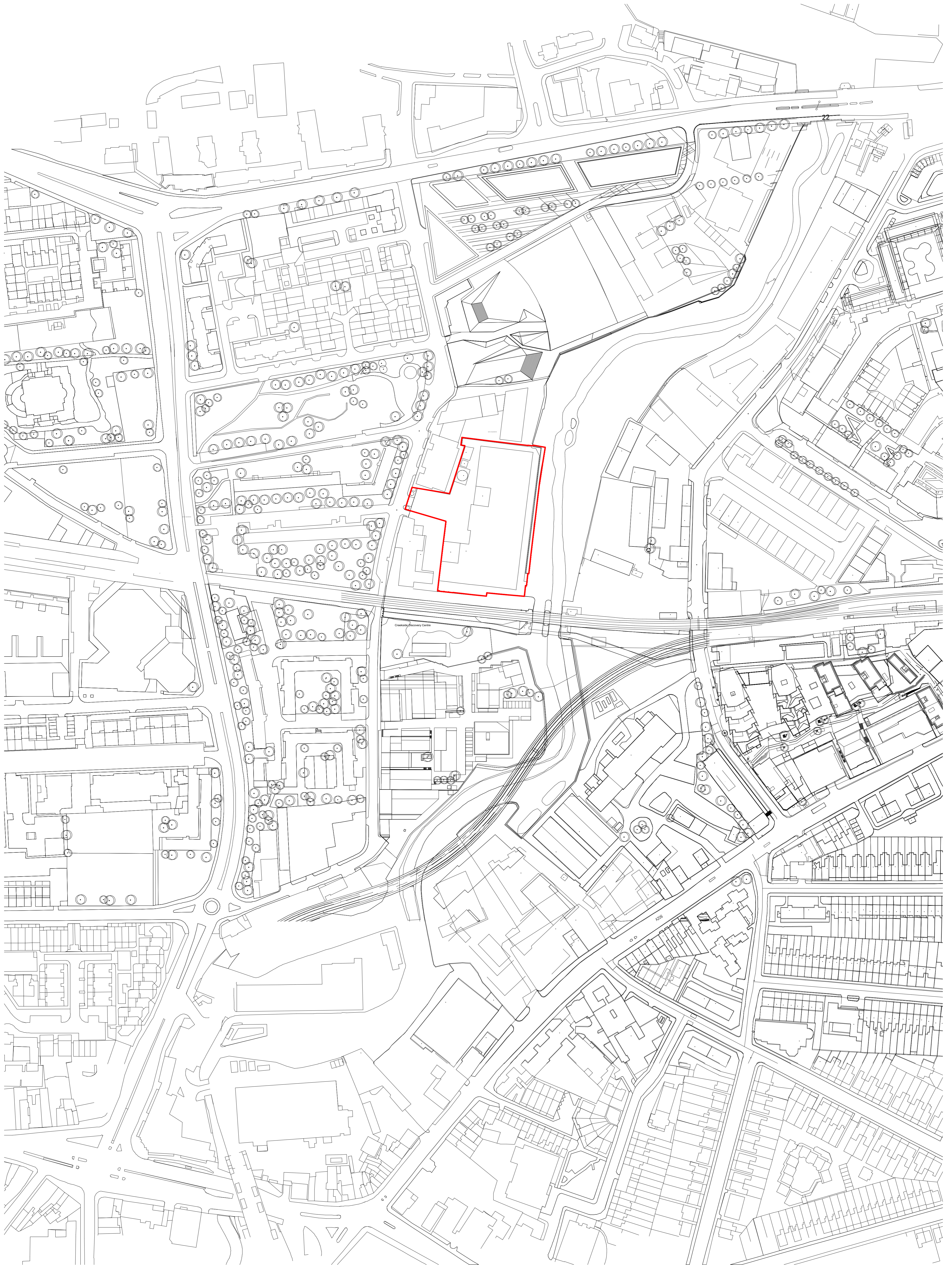
Please do not hesitate to contact me or my colleague Mia Scaggiante ([MScaggiante@savills.com](mailto:MScaggiante@savills.com); +44 (0) 7976 415 803) to arrange a meeting and/or you have any further queries. In any event, we would be grateful if you could keep us updated of the progress with the new draft Lewisham Local Plan

Yours faithfully



**Scott Hudson**  
**Director**

**CC** Bellway Homes Ltd and Peabody Development Ltd  
**Encl** Site Location Plan



rev	date	description
P01	02/09/2020	Planning submission

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**BELLWAY & PEABODY**  
Project  
**SUN WHARF**  
Drawing  
**Site Plan - Location Plan**

Status **PLANNING**  
Scale 1:1250@A1  
CAD File 3336-SunWharf-MasterFile  
Date 02/09/2020  
Drawn YJ  
Checked JSn  
Project No - Drawing No Revision  
**3336A-PL(90)\_00\_P01**

Our Ref: 02C101411

24<sup>th</sup> April 2023

Planning Policy Team  
London Borough of Lewisham  
4<sup>th</sup> Floor, Laurence House  
1 Catford Road  
London  
SE6 4RU

Dear Sir/Madam,

**Representation to the London Borough of Lewisham's Consultation on the 'Draft Regulation 19 Local Plan' (Dated January 2023)**

**Barratt London**

We write on behalf of Barratt London (BL) in representation to the London Borough of Lewisham's (LBL) current consultation on the Draft Regulation 19 Local Plan (January 2023). This document is of interest to BL given its landholding at 'Bell Green Works' (the Former Bell Green Gasholders), London (the Site). For clarity, the location of the Site is shown within **Appendix I** of this Representation.

We understand that LBL seeks to publish a new Local Plan which will set out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision to 2040. Once finalised the Local Plan will comprise an adopted document within Lewisham's statutory Development Plan and will replace the current Lewisham Core Strategy (2011), Site Allocations Local Plan (2013) and Development Management Local Plan (2014).

Overall, BL broadly supports the principle of the emerging Local Plan to help establish a future vision for Lewisham. However, we do make various comments below concerning how its policies (especially those relating to the Site) should be addressed within this document.

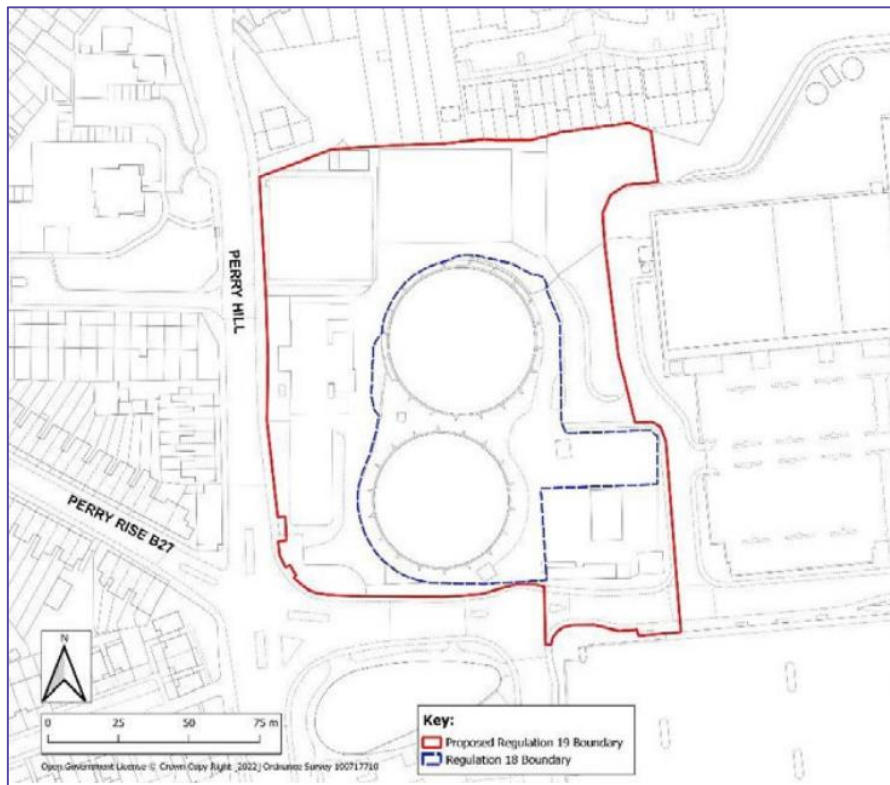
**Context of Representation**

The Site is currently the subject of a live planning application (Ref: DC/23/129814), submitted to LBL in December 2023. As such, LBL's emerging Local Plan comprises a key material consideration in the determination of this application – as the document will importantly gain weight in planning decision-making concerning the Site as preparation of the emerging Local Plan progresses.

**Former Bell Green Gas Holders and Livesey Memorial Site Allocation (Site Specific Policy)**

Within the draft Regulation 19 Local Plan the Site, together with the adjacent Livesey Hall and its curtilage, forms part of the Draft Site Allocation 1 (*Former Bell Green Gas Holders and Livesey Memorial Hall*). Given that the Site comprises an important strategic development and regeneration opportunity within the Bell Green area, the Draft Site Allocation is hugely relevant to the BL's future development aspirations at this stage.

For clarity, the current Draft Site Allocation 1 boundary is set out within **Figure 1** below:



**Figure 1. Site Allocation 1 Former Bell Green Gas Holders and Livesey Memorial Hall**

Overall, we strongly support the inclusion of the Former Bell Green Gas Holders and Livesey Memorial Site Allocation within the draft Local Plan given that it seeks to ensure the comprehensive, residential-led redevelopment of this important brownfield and vacant site within the Borough. We have the following more detailed comments:

*Development Capacity*

The current Draft Site Allocation sets out illustrative criteria associated with its future comprehensive mixed-use redevelopment, identifying indicative capacity for 100-442 net residential units, 465sqm employment space and 1,859sqm main town centre use.

We broadly support the inclusion of these thresholds, providing that these remain illustrative (and allow for the opportunity to optimise development capacity beyond these thresholds if justified in design and planning terms). In addition, we consider that the Draft Site Allocation should allow for lower provision of non-residential floorspace to be delivered at the Site providing that this is justified via market/commercial demand evidence.

In short, the Draft Site Allocation should allow for flexibility, to ensure that future development at the Site is ultimately deliverable on this suitable, available and achievable brownfield site.

*Relationship with Livesey Hall*

The Draft Site Allocation requires development to be sensitive to the setting of the listed Livesey Memorial Hall and its curtilage (included its surrounding open spaces and on-site structures), along with the listed boundary wall and War Memorial.



We broadly support the principle of ensuring that new development within the Draft Site Allocation is respectful of the Livesey Memorial Hall's character and setting (in heritage terms). However, this should not preclude the delivery of residential-led development there, nor the delivery of much needed new homes, providing that key planning, design and heritage matters are addressed through a comprehensive design process.

*Comprehensive Masterplanned Approach*

We broadly support the aspiration for the Draft Site Allocation to be comprehensively masterplanned.

Given the multiple land ownerships within the allocation boundary, we consider that this can be suitably achieved through ensuring that 'neighbourly design principles' are incorporated into each respective scheme. We recommend that wording clarifying these matters be added in to the allocation wording.

This approach will help to ensure that delivery of development on the part of the Draft Site Allocation (owned by BL) is not slowed down by a lack of progress on other parts of the Site. Development on each part of the Site should be designed to not prejudice development coming forward on adjacent land parcels within the allocation.

*Building Heights*

The development guidelines within the Draft Site Allocation advise that tall buildings will not be appropriate in the western portion of the site. However, part of the Draft Site Allocation (within the south-east) is included within an identified 'Tall Building Suitability Zone'.

We broadly support the Council's approach towards identifying tall building locations within the Draft Site Allocation. However, the Policy should be worded more flexibly (to potentially allow taller elements to come forward on other parts of the Site, providing that proposals are justified via design, planning, townscape/visual and heritage evidence).

**Policy LSA3 – Bell Green and Lower Sydenham**

Draft Policy SA3 seeks to designate an Opportunity Area at Bell Green and Lower Sydenham to help realise the growth and regeneration potential of the area. We strongly support this aspiration.

Part (B) of Policy LSA3 sets out the Council's strategy to prepare a Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham. However, the Policy is not currently clear as to the mechanisms by which the masterplan would engage with local landowners and key stakeholders.

We suggest that the following amended wording be included within this policy:

*To help realise the growth and regeneration potential of Bell Green and Lower Sydenham, and to ensure that new development within the area supports the delivery of the spatial strategy for the Borough, the Council intends to prepare a Supplementary Planning Document and/or Masterplan through consultation with the local community, **stakeholders and other key interested parties (such as local landowners)**. This will complement the Local Plan in setting a long-term development and investment framework for the area. Development proposals must demonstrate how they have engaged positively with planning guidance endorsed or adopted by the Council.*

The above approach will help to ensure that the Bell Green Masterplan is prepared via comprehensive consultation with key local landowners, stakeholders and the local community.

In addition, the Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham should be drafted to ensure consistency with the provisions of the Draft Site Allocation in due course.

#### **Policy QD4 - Building Heights**

Draft Policy QD4 sets out the identified locations considered as potentially appropriate for tall buildings, in accordance with London Plan Policy D9.

Notably, the Draft Policy identifies the Lower Sydenham/ Bell Green proposed Opportunity Area (which includes the Site) as a potential location appropriate for tall buildings. This approach appears to be underpinned by London Borough of Lewisham's Tall Building Study Addendum.

We broadly support the proposed locations where tall buildings are considered to be appropriate within the Bell Green and Lower Sydenham Opportunity Area – subject to the comments set out above in relation to building heights within the Draft Site Allocation.

In addition, Part (c) of this policy identifies that tall buildings in the Lower Sydenham / Bell Green Opportunity Area should be no more than 39.2 meters (12 storeys) to 52 meters (16 storeys). We consider that greater flexibility should be applied to building heights within parts of the Tall Building Zone (if justified in design, planning, townscape and heritage terms).

We also highlight that the above comments relate principally to the policy approach concerning building heights within Bell Green and Lower Sydenham. BL has submitted additional comments concerning the Council's approach more generally (and how these relate to BL's other landholding at Catford Island), via a separate representation.

#### **Policy HE2 - Designated heritage assets**

Draft Policy HE2 seeks ensure development proposals preserve the significance of Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens and London Squares and the Maritime Greenwich World Heritage Site Buffer Zone.

We support the approach within Policy HE2 to preserve or enhance the value and significance of the historic environment. However, we consider that Paragraph (H) should be amended as follows to ensure that there is no conflict with the National Planning Policy Framework (NPPF).

In line with NPPF, paragraph 201 we suggest that Paragraph (H) should be amended as follows:

*Development proposals that would result in substantial harm to the significance of a Listed Building and its setting will be strongly resisted, **unless where it is demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm**, in line with the NPPF.*

#### **Policy SD2 - Sustainable design and retrofitting**

We broadly support the Council's objectives to consider sustainable design principles early in the planning and design stages for proposed developments.

Part C of the draft Policy requires new non-residential development of 500 sqm or more, to achieve a BREEAM 'Excellent' rating.

At present this wording does not acknowledge there may be site specific technical factors that mean an 'Excellent' rating cannot be achieved. We therefore request the policy be amended to clarify that this rating is a **'target'** rather than a fixed policy requirement.

We hope that the above points are clear/helpful.

As set out above, we overall broadly support the key aspirations of LBL's Draft Local Plan (subject to the above comments being considered and addressed). We consider that LBL should consider and incorporate the above comments as a means of ensuring that the Local Plan, and its policies, are **'sound'** (as per NPPF requirements).

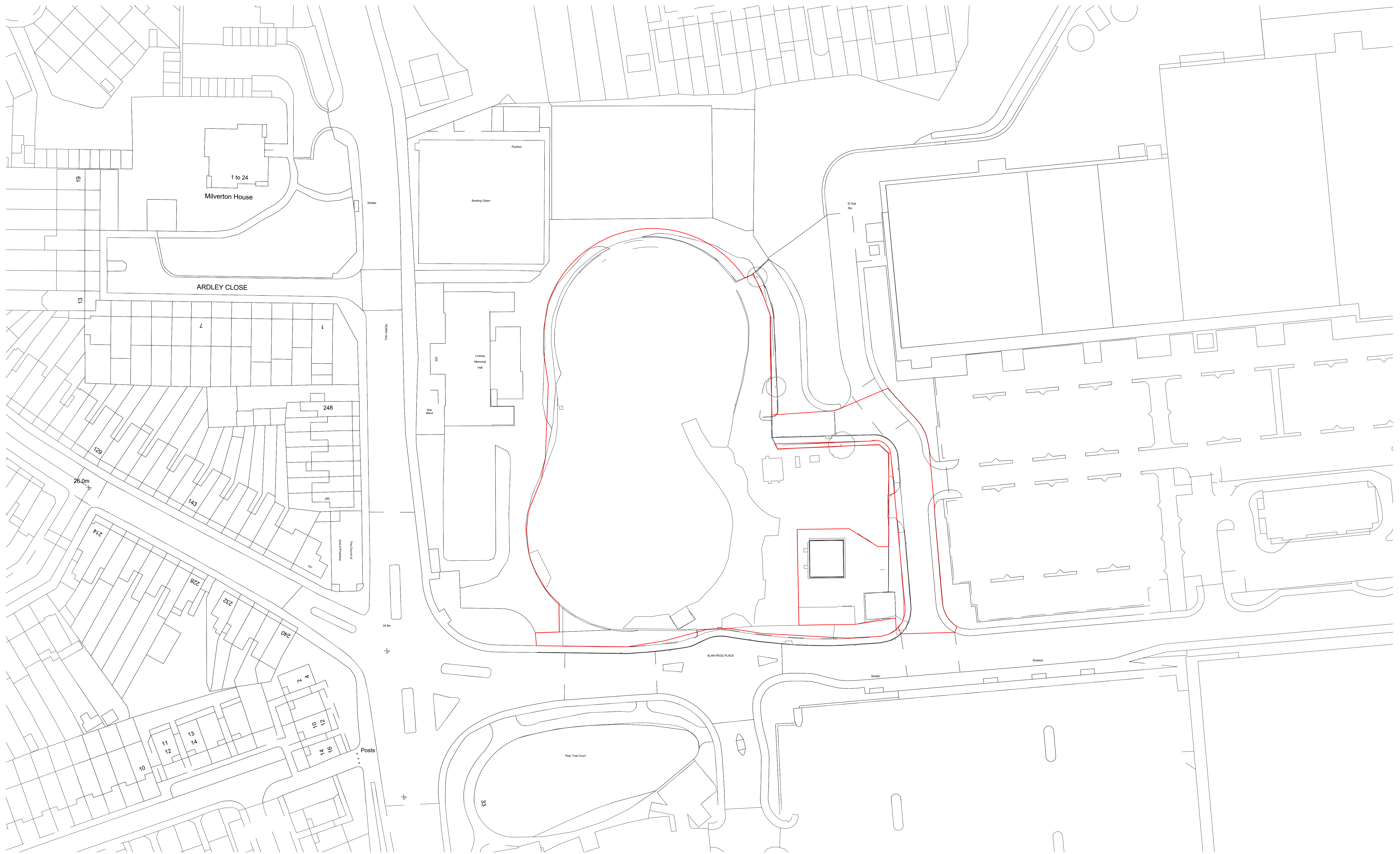
Should you have any queries and/or wish to discuss the contents of this Representation, please do not hesitate to contact either Colin Sinclair or Isobel Paterson at the above Avison Young office.

Yours faithfully

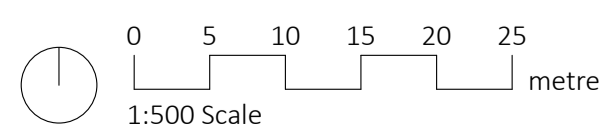


**Colin Sinclair**  
**Associate Director**  
**Colin.Sinclair@avisonyoung.com**  
**For and on behalf of Avison Young (UK) Limited**

## **Appendix I – Site Plan**



Date	Rev	Description	Legend	Notes
21.12.2022		FOR INFORMATION		



**Key Plan**

**Disclaimer**

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Scale	Drawn	Checked	Date
1 : 500	MT	JW	21/12/22

Project:	Client:
Sydenham Bell Green Works	Barratt London

Drawing Title:	Drawing No:	Rev:
Existing Site Plan	SYD-dMFK-XX-00-DR-A-A50	



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t: 0207 435 1144 e: info@dmfk.co.uk w: www.dmfk.co.uk

Planning Service  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
London  
SE6 4RU

Date: 25<sup>th</sup> April 2023

Dear Sir or Madam,

## Representations to Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review.

On behalf of John Lyon's Charity (hereinafter 'our Client'), Knight Frank hereby submit representations in respect of the Regulation 19 Consultation on the Lewisham Local Plan Proposed Submission Document (hereinafter 'the Lewisham Local Plan'), which is running from 1<sup>st</sup> March 2023 to 25<sup>th</sup> April 2023.

The London Borough of Lewisham (hereinafter 'LBL') commenced a review of the current Lewisham Local Plan in late 2015, with a consultation on the 'main issues'. LBL subsequently undertook a Regulation 18 Consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document which ran from January to April 2021.

It is intended that once the current Regulation 19 Consultation on the Lewisham Local Plan closes, the Lewisham Local Plan will be submitted for Examination in Public by a Planning Inspector to be appointed by the Secretary of State. If adopted, the Lewisham Local Plan will form the basis of the London Borough of Lewisham's Development Plan, and guide development within the borough during the plan period.

Our Client have a land interest within the borough, namely the ownership of 'Trade City', Spine Road, London, SE26 4PU (hereinafter 'the Site'), which will be affected by those policies and allocations contained within the Lewisham Local Plan.

Our Client welcomes the Council's preparation of the Lewisham Local Plan, and broadly supports those strategic objectives of the Lewisham Local Plan, namely; the delivery of 'good growth' and directing new development on previously developed land.

Nonetheless, our Client has concerns with the 'soundness' of the Lewisham Local Plan; namely the Council's approach to the future redevelopment of the 'Bell Green Retail Park' and wider Bell Green and Lower Sydenham. Our Client contends that in its current form, the site allocation for 'Bell Green Retail Park' and wider objectives for Bell Green and Lower Sydenham do not represent the most appropriate strategy for the delivery of the Council's aspirations for redevelopment. Our Client therefore proposes amendments to the Lewisham Local Plan if it is to be found 'sound'.

### The Site

'Trade City' is a purpose-built industrial, warehouse and trade counter development, which currently comprises 5,102sq.m of floorspace. The Site is situated immediately to the west of the Bell Green Retail Park, and is bound by a 'green buffer' on the north, east, and south. There are residential uses beyond the 'green buffer' to the north, while Pool River lies to the east.

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The Site, which extends to approximately 1.4ha, forms part of the wider 'Bell Green Retail Park' site allocation under the provisions of the Regulation 19 Proposed Submission Document. The 'Bell Green Retail Park' site allocation is bound by the 'Former Bell Green Gas Holders and Livesey Memorial Hall' site allocation to the west, and the 'Sainsbury's Bell Green' site allocation to the south. 'Stanton Square Locally Significant Industrial Site' and 'Sydenham Green Group Practice' site allocations are also in close proximity to the south-west of the Site.

The Site, and the wider 'Bell Green Retail Park' site allocation fall within 'Bell Green and Lower Sydenham', which the Council identify for targeted for comprehensive regeneration under the provisions of the Regulation 19 Proposed Submission Document.

When adopted, the new Lewisham Local Plan will shape the future of the borough and the regeneration of the Site and the wider area. Our Client therefore wishes to ensure that the Lewisham Local Plan is robust, flexible, and capable of responding to future economic and demographic changes. It is in this context that our Client submits these representations to the Regulation 19 Consultation on the Lewisham Local Plan Proposed Submission Document.

### Test of 'Soundness'

Paragraph 35 of the National Planning Policy Framework (hereinafter 'NPPF') states that local plans should be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. Plans are considered to be 'sound' if they are:

- **Positively prepared** – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
- **Effective** – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

If the Lewisham Local Plan Proposed Submission Document fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which under Section 19 of the Planning and Compulsory Act 2004, is a legal requirement.

### Bell Green and Lower Sydenham

The 'Bell Green Retail Park' site allocation falls within 'Lewisham's South Area', which the Council identify as a key regeneration area. More specifically Bell Green and Lower Sydenham are identified within 'Lewisham's South Area' as being areas for growth and regeneration. The regeneration of brownfield sites within Bell Green and Lower Sydenham are expected to deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space.

Reflecting their aspirations for Bell Green and Lower Sydenham to be areas for growth and regeneration, the Council hope to *'coordinate new investment in the Bell Green and Lower Sydenham area to enable it to become a London Plan Opportunity Area in a future update to the London Plan'*.

In this context the Council aim to deliver the regeneration of the former gasholders, Bell Green Retail Park and other sites nearby to create a new high quality residential-led mixed-use area, with a new Local Centre, that is well integrated with existing neighbourhoods and communities.

Our Client welcomes the identification of the 'Lewisham's South Area' and Bell Green and Lower Sydenham as a 'Strategic Area for Regeneration', and the Council's support for the further designation of Bell Green and Lower Sydenham as an Opportunity Area within a future review of the London Plan.

However, our Client expresses concerns with the Council's intention to *'prepare a Supplementary Planning Document and/or Masterplan through consultation with the local community'* within Policy LSA3 (Bell Green and Lower Sydenham) in addition to the requirement within the 'Bell Green Retail Park' site allocation to prepare a *'master plan for comprehensive redevelopment of the former Bell Green gas holders, Bell Green Retail Park and Sainsbury's Bell Green'*.

It is contended that the proposed Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham is unnecessary given the key sites within Bell Green and Lower Sydenham (including the Bell Green Retail Park) are also subject to site allocations, the delivery of which are in turn required to be informed by a joint masterplan. In

this context the requirement for the preparation of a Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham is considered to be unnecessary, and would represent a duplication of the masterplan required for the site allocations. This duplication is considered to risk the timely delivery of the Council's aspirations for the regeneration of Bell Green and Lower Sydenham and the site allocations specifically within the plan period, and therefore our Client contends that the Lewisham Local Plan as currently drafted is not 'effective' and is therefore 'unsound'.

### **Bell Green Retail Park**

Under the provisions of the Lewisham Local Plan Proposed Submission Document together with the neighbouring Bell Green Retail Park the Site forms the 'Bell Green Retail Park' site allocation. The Site represents the eastern part of the wider 'Bell Green Retail Park' site allocation, which extends to approximately 7.37ha.

While our Client welcomes the allocation of the Site for comprehensive redevelopment, they express the following concerns with the proposed 'Bell Green Retail Park' site allocation.

#### **Land Use and Indicative Capacity**

The 'Bell Green Retail Park' is allocated within the Lewisham Local Plan Proposed Submission Document for the comprehensive mixed-use redevelopment of the existing out-of-centre retail park, to provide compatible residential, commercial, main town centre and community uses.

The site allocation includes an indicative development capacity of between 748-1,831 net residential units, 3,740sq.m of employment floorspace, and 14,961sq.m of main town centre uses.

While our Client acknowledges the need to include an indicative development capacity within the site allocation, they note that the proposed site allocation allows for a significant range of development capacity. As such our Client contends that any forthcoming development within the site allocation should not be limited to indicative development capacity included within the site allocation. Indeed, it is assumed that the indicative development capacity range is a result of the absence of detailed design scrutiny in support of the allocation, and that the appropriate range of land uses has not been identified as a result of a design-led approach.

In this context it is important to ensure that any forthcoming development proposals within the site allocation follows a design-led approach, through which the true development capacity shall be identified, and that this design-led approach should take precedent over the purely indicative site capacity as set out within the site allocation.

Furthermore, the indicative development capacity does not acknowledge that the site allocation comprises separate landownerships, and that the delivery of these separate landownerships may not be aligned in respect of their timing or development objectives. It is therefore imperative that the indicative development capacity, and proposed land uses, are applied flexibly.

Our Client therefore recommends that the redevelopment of the Site, and wider 'Bell Green Retail Park', would be best achieved through a design-led approach. A design-led approach would ensure that the actual development capacity, and appropriate land uses, are secured through the development management process, with evidence that all reasonable development options have been tested, and that the appropriate strategy for the redevelopment of the site allocation has been secured.

The site allocation also includes for the provision of 3,750sq.m of employment floorspace. Our Client supports the inclusion of employment floorspace within any proposals for redevelopment within the site allocation, and acknowledges the important role that a mix of uses will perform in creating a sustainable community. It is particularly noted that the site allocation currently comprises employment uses. However, detail on the nature of the suitable employment uses is not provided within the site allocation. Our Client therefore requests further clarification as to those types of employment uses that would be supported within the site allocation.

The site allocation also includes for 14,961sq.m town centre uses. As with the proposed employment uses the site allocation does not currently provide any further detail on the nature of those town centre uses expected by the Council. Again, our Client supports the inclusion of town centre uses within the site allocation, and welcomes the provisions of Policy EC12 (Town centre network and hierarchy) which acknowledges that the provision of main town centre uses outside of Lewisham's existing centres is appropriate where provision has been made within the site allocation.

Overall, the Client supports the Council's aspirations for the redevelopment of 'Bell Green Retail Park' for mixed-use redevelopment and welcomes the Council's aspirations for the regeneration of the wider area through the redevelopment of



the Bell Green Retail Park. However our Client requests that the site allocation is amended to allow greater flexibility in terms of the overall development capacity, as well as those suitable land uses.

### **Landowner Partnership and Masterplan Requirement**

While our Client welcomes the allocation of the Bell Green Retail Park, and broadly supports the Council's aspirations for the redevelopment of the 'Bell Green Retail Park' (as above), our Client raises significant concerns regarding the deliverability of the 'Bell Green Retail Park' site allocation in context of the multiple landownerships. Our Client therefore seeks reassurances that the site allocation can be delivered in the context of the multiple landownerships, and that any proposals for the development of part of the site allocation could be supported in the event that it is demonstrated that these would not prejudice the delivery of the remainder of the site allocation.

In this context it is noted that the development requirements associated with the site allocation currently state that *'Landowners must work in partnership and in accordance with a master plan for the Bell Green and Lower Sydenham area including a site masterplan, to ensure the appropriate co-location, phasing and balance of uses across the site, in line with DM3 (Masterplans and comprehensive development).'*

As previously noted, our Client is concerned that the requirement for the masterplan for the Bell Green and Lower Sydenham area represents a duplication of the requirement for the preparation of a separate masterplan for the Bell Green Retail Park site allocation itself. Indeed, it is contended that the current site allocation wording is onerous in that it requires landowners to work in partnership and in accordance with a master plan for Bell Green and Lower Sydenham **and** in accordance with a masterplan for the 'Bell Green Retail Park'.

The requirement to prepare masterplans refers to Policy DM3, which requires masterplans to comprise of: an assessment of the site and its context; a detailed site-wide masterplan that responds positively to the spatial strategy for the borough, site specific development principles and guidelines, and other relevant planning policies; and a delivery strategy that identifies how the development will be implemented and managed over its lifetime.

Our Client acknowledges that the redevelopment of the 'Bell Green Retail Park' would be best achieved through a design-led approach that ensures *'the appropriate co-location, phasing and balance of uses across the site'*. However, it is contended that this requirement could be achieved through the preparation of a single masterplan developed between the landowners within the 'Bell Green Retail Park' alone, and does not necessitate a separate masterplan for the wider Bell Green and Lower Sydenham.

The Client acknowledges that it is necessary to consider the surrounding context and take account of emerging development when (re)developing a site, however policy already requires emerging development to do so, without requiring 'partnerships' between landowners. For example, Policy QD1 (Delivering high quality design in Lewisham) Part C(b) states that development proposals must be designed to address the prevailing or emerging form of development. Our Client contends, therefore, that it is arguably more efficient to allow parcels of land within the site allocation to come forward independently whilst ensuring proposals are compatible and overall cohesion is maintained.

Given the 'Bell Green Retail Park' site allocation comprises different landownerships, the site allocation must ensure that the development of one part of the allocation does not prejudice the development potential of another part of the allocation. The conclusions of a design-led process, which accounts for neighbouring land parcels should therefore take precedent over the indicative development capacity for the site allocation as a whole, which has not given detailed consideration to the separate landownerships across the site allocation.

Overall, it is contended that phased redevelopment of the 'Bell Green Retail Park' could be adequately satisfied through a development management process, supported by a requirement for proposals not to prejudice the delivery of the remainder of the site allocation. While imposing the requirement for the preparation of a Supplementary Planning Document and/or masterplan for the wider Bell Green and Lower Sydenham is unnecessary given the detail which can be secured through the site allocation itself and subsequent planning application process. The requirement for the preparation (and adoption) of a Supplementary Planning Document and/or masterplan would likely result in significant delays to the delivery of Council's aspirations for the 'Bell Green Retail Park' and wider area. In this context, it is contended that the site allocation does not currently accord with the requirements of Paragraph 35 of the NPPF in that it is neither justified nor effective.

Overall, it is contended that the site allocation for 'Bell Green Retail Park' must acknowledge the multiple landownerships within the site allocation and, facilitate the phased redevelopment of the site allocation while ensuring that the redevelopment of part of the site allocation does not prejudice the delivery of the remainder of the site allocation.

## Tall Buildings

The 'Bell Green Retail Park' site allocation is identified as an area considered to be appropriate for tall buildings, in line with Policy QD4 (Building heights). Policy QD4, Part C(g) sets the threshold of normal maximum heights in the Lower Sydenham / Bell Green proposed opportunity area to be 12-16 storeys. Figure 5.10 'Bell Green / Lower Sydenham tall building suitability zone' confirms the maximum threshold for the Site is 16 storeys.

It is acknowledged that the proposed building heights have been amended since the September 2022 version of the Regulation 19 Proposed Submission Document, which included normal maximum heights of 12-20 storeys. It is understood that the analysis contained within the Tall Building Review Background Paper (2023) informed the amendments to the 'normal maximum heights', with the analysis applying an 'additional level of scrutiny' to that utilised by the earlier Allies and Morrison in the 2022 Tall Building Study Addendum. While the identification of the Site as falling within an area considered to be appropriate for tall buildings is welcomed, including an indicative building height range should not prejudice development coming forward at the upper limits of this range where it has been demonstrated that a site can accommodate such heights. The Client suggests that additional text is provided to ensure the Policy is suitably flexible and allows proposals to utilise the design-led approach to optimise site capacity.

## Conclusion

John Lyon's Charity welcome the preparation of the new Lewisham Local Plan, and broadly support the Council's aspirations for the regeneration of Bell Green and Lower Sydenham, including the 'Bell Green Retail Park' site allocation. However, our Client raises concerns about the deliverability of the current site allocation as currently worded. Our Client therefore requests amendments to the site allocation, and corresponding policies, to ensure the site allocation can be delivered in a timely and effective manner.

Overall, it is considered that in its current form the draft Local Plan would not be legally compliant, and it is suggested that the Council undertake further review.

We look forward to engaging further in the preparation of the Lewisham Local Plan, and the opportunity to make further representations to the Lewisham Local Plan, and the Examination in Public.

Should you have any queries or require further information at this stage, please contact James Cogan (James.Cogan@knightfrank.com).

Yours faithfully,



**Knight Frank LLP**



BPTW are instructed by Phoenix Community Housing (PCH) to prepare representations to Lewisham’s Local Plan Regulation 19 consultation. This follows representations submitted to the Regulation 18 Local Plan and the A21 Development Framework in 2021.

PCH is a not-for-profit resident-led housing association based in south London. It owns and manages more than 7,600 homes in the Lewisham wards of Bellingham, Catford South, Downham and Grove Park and builds genuinely affordable new homes with an emphasis on sustainability and high-quality design. PCH is a valued partner of the Council and we have worked together on many schemes within the borough. As a key stakeholder within the borough, PCH has a keen interest in the new Local Plan and other emerging development plan documents that may have a major impact on the future operations of the association.

PCH acquired the Catford Police Station site, located within Lewisham’s South Area in 2021, and proposes a mainly affordable housing scheme. However, this is to be finalised following design development, pre-application discussions with the Council and viability assessment of the site options during 2023. A PPA will shortly be agreed with the Council to steer pre-application discussions and the planning application programme for development at the site.

PCH are generally supportive of the draft Local Plan and these representations are focused on Part Three, Chapter 17 of the Local Plan and the related site allocation for the south area under (9) Catford Police Station which currently identifies an indicative capacity identified for 24 residential homes and 1,072 sqm of employment floorspace.

PCH welcomes the site allocation of the Catford Police Station site in the Local Plan and the acceptance, in principle, that new development can be brought forward on the site. However, it is considered that the indicative capacity and quantum of uses should be reviewed. As currently drafted, the Plan is not yet considered ‘sound’ as the development quantum and mix is not robustly justified, or evidence led. The Plan fails to consider the available evidence base including a recent site capacity study and will not be effective in optimising development potential of the site for a residential and affordable housing-led scheme.

### **Local Plan and Regulation 19 Evidence Base**

The Site Allocations Background Paper (2021) was prepared for the Regulation 18 Plan and needs updating. The Background Paper states that the indicative development capacity for site allocations is established firstly by any existing planning permissions, masterplan sites or pre-application stage proposals, with a fallback position of a crude numeric calculation based on the London-wide SHLAA density matrix (see Appendix 1).

With regards to the Catford Police Station, it is understood that pre-application discussions were undertaken by a previous developer in Summer 2021 with an initial scheme comprising up to 80 homes and ~300 sqm of retail space presented. The housing and employment quantum for the site allocation of the site does not appear to acknowledge or give weight to this initial scheme or any alternative scheme likely to be presented by PCH with Officers during 2023 based on its own site capacity study. Instead, as set out in Appendix A of the Site Allocations Background Paper, the quantum of residential development on the proposed site allocation appears to rely solely on the standard London SHLAA method (standard method) approach.

There is clearly a hierarchy of information and evidence base used to identify site capacities, with pre-application schemes and applicant capacity studies being preferred to the standard method. There is no justification for why the Policy Team in preparing the Local Plan have ignored or omitted these other sources of evidence and thus the site allocation for the Catford Police Station site cannot be seen as justified.

It should also be recognised that the standard method approach results in a site capacity of 46 homes (see Appendix 1 of this representation), which significantly differs from the 24 home capacity currently identified in the site allocation.

It is unclear where this discrepancy comes from if the capacity of the site allocation has in fact been established via the standard method approach. The indicative capacity of the Catford Police Station site allocation instead appears to have been identified via the baseline capacity study undertaken as part of the A21 Development Framework (see Appendix 2 of these representations) which is not listed as the part of the evidence base to the Regulation 19 Plan.

The baseline study in the A21 Development Framework started with an indicative capacity of 39 residential homes and 487sqm non-residential floorspace for the site but after a design exercise was then reduced to a total of 24 units and an undefined quantum of non-residential floorspace. It should be noted that the capacity assessment is only based on land to the rear of the site and that it does not include or add potential capacity (either through reuse or reuse with extension) of the retained Local listed police station buildings fronting the A21, thus it significantly underplays total site capacity within the redline boundary of the site allocation as shown in the Local Plan.

The use of the A21 Development Framework as an evidence base also contradicts the approach set out in the Site Allocation Background Paper and adds further uncertainty to whether the Council's approach to the site allocation of the Catford Police Station site is justified or will be effective in delivering Local Plan strategic objectives.

Additionally, there does not seem to be any reasoned justification or evidence for including 1,072sqm of employment floorspace in the site allocation. This figure was not identified in the Regulation 18 Local Plan or the capacity study in the A21 Development Framework and it is not clear whether this is based on retaining some employment floorspace in the existing buildings.

If the standard method density matrix methodology is followed, 160sqm of employment and 320sqm of main town centre uses could be provided or included in the allocation. These figures are very similar to the 162sqm of employment and 325sqm of main town centre uses proposed for the allocation in the previous Regulation 18 version of the Plan. Again, the evidence and methodology used to calculate and justify these changes is unclear and the inclusion of employment and/or main town centre uses seems arbitrary.

Table A.2 in Appendix A of the Site Allocations Background Paper indicates that 5% of the site area should be employment and 10% should be main town centre uses, yet no explanation is provided as to why this should be the case.

It is our view that an arbitrary percentage should not be applied to the site allocation for Catford Police Station as it would not reflect the suburban character of the site and force the introduction of employment/town centres uses into a predominantly residential area, in conflict with good land use principles.

Source	Residential Quantum	Non-residential Quantum	Notes
2021 Previous developer scheme	~70-80	~300 sqm	No weight seems to have been given to this initial scheme understood to have been discussed with LB Lewisham during pre app.
A21 Development Framework	24 (uses 39 as an indicative capacity)	N/A (uses 487sqm as an indicative capacity)	Site capacity is only based on new development on land to the rear of the existing buildings.  No capacity is provided for reuse or extension of existing buildings fronting the A21.
Standard Method	46	320sqm employment and 160 sqm main town centre	Appendix A of the Background Paper (2021) identifies that the standard method is the evidence based used to establish site capacities.

Table 1: Summary of all evidence sources

## PCHA Site Capacity Study

PCHA commissioned Metropolitan Workshop in March 2023 to develop a capacity study for this site.

Two options have been developed as shown in the table below and Appendix 3 of these representations. They include a mixed-use scheme and a 100% residential scheme that retains the locally listed Police station building fronting the site.

	100% Residential	Mixed-Use
<b>Residential Quantum</b>	62	60
<b>Residential Mix</b>	31% 1bed 34% 2bed 35% 3B+	30% 1bed 34% 2bed 36% 3B+
<b>Other uses</b>	N/A	128sqm employment space
<b>Maximum Height</b>	6 storeys	6 storeys
<b>Car Parking</b>	8 spaces	8 spaces

Table 2: Metropolitan Workshop capacity study

PCH has a number of sites in the immediate area with employment/community use floorspace and it is considered that such space could reasonably accommodate some of the employment floorspace expected at the Catford Police Station site – this would also enhance the community value and employment benefits that these existing PCH facilities provide whilst also providing new tenants with opportunities for support and collaboration with PCH.

As the site capacity study shows, the site can accommodate a level of development that far exceeds capacity identified in the Local Plan Regulation 19 site allocation and that it should be amended to show capacity for 60-65 homes and a smaller quantum of employment floorspace to better align with design led approach to optimising development capacity required by the London Plan.

PCH will enter a PPA to steer pre-application discussions during 2023 and an agreed programme for a planning application for the site. Weight should be given to this intent in considering modifications to the Plan prior to the Examination of the Local Plan.

The site allocation for the Catford Police Station site in the Local Plan Regulation 19 is not yet considered sound as it is not justified by the Council’s evidence base (including an updated Site Allocations Background Paper or if the standard method approach is used) or the design led approach that will be progressed by PCH in its site capacity study and planning application. As it stands, the current drafting of the site allocation in the Plan fails to optimise the site’s capacity and undermines strategic objectives in the Plan for delivering more affordable housing in the Borough.

### Objectives for the Site

The failure of the draft site allocation to optimise the site capacity is particularly pertinent given that PCH bought the site to deliver affordable housing and as the site was publicly owned, a 50% affordable housing provision is required unless supported by a viability assessment through the Viability Tested Route for a planning application.

Housing affordability plays a significant role in London’s housing crisis. According to the GLA data store, there have only been 1,656 residential completions in LB Lewisham in the period 2019/2022, which is significantly below the London Plan target of 1,667 per year (5001 for three years). Furthermore, the Borough has only approved 1,789 homes in the period between 2019/2022.

The figures are even starker when affordable housing delivery is singled out: of the 1,656 completions, only 352 were affordable; of the 1,789 approvals, only 285 are affordable.

	Approvals	Completions	London Plan Target (3 years)
<b>Total residential</b>	1,789	1,656	5001
<b>Affordable</b>	285 (16%)	352 (21%)	Strategic target of 50% (2,500)

*Table 3: Residential Approvals and Completions in Lewisham 2019/2022*

The figures quoted above show that LB Lewisham is not delivering enough housing and does not have a strong pipeline of approvals to boost this supply. In a context where London-wide there is an acute need for housing, with 47% of this being for affordable tenures, a local, community-based housing association that is looking to optimise the site capacity for affordable housing development should be strongly supported.

PCH have a recent history of delivering high quality affordable housing in the borough, with completed developments at:

- > Nuthatch House, Whitefoot Lane
- > Hazlehurst Court
- > Woodbank Road

PCH are also on site actively delivering affordable homes at:

- > Velo House, Catford
- > Melfield Gardens
- > Farmstead Road

Given PCH’s strong positive presence in the borough, they are looking to progress the Catford Police Station site through a planning application with a view to optimising affordable housing delivery. This includes a range of unit sizes as demonstrated in the initial Metropolitan Workshop capacity study.

PCH therefore requests that the Local Plan and the Catford Police Station site allocation is amended prior to submission of the Plan with the amendments provided as an addendum to the Regulation 19 Local Plan to ensure that the site capacity and contribution it could reasonably make to strategic Local Plan objectives for housing and sustainable communities is achieved. Alternatively, modifications to the Plan should be provided to the Inspector as part of the Local Plan Examination.

## Suggested Changes to Site Allocation Text

- > Increase indicative development capacity to 60-65 homes - this in line with PCH's own capacity study and would include reuse or reuse and partial extension to the existing police station buildings fronting the A21 i.e. It would identify a capacity suitable for all land with the site allocation boundary.
- > Reduce the non-residential/ employment floorspace to zero or reduce to the Regulation 18 requirements - 162sqm employment and 325sqm main town centre uses, in line with the standard method. This should be accompanied with clearer guidance as to why these uses are necessary in this location.
- > Alter the timeframe for delivery to years 1-5.
- > Para 17.46 – if non-residential uses are maintained, guidance should be put here to explain why they are necessary. The site lies outside of any designated town centre and has a suburban character with predominantly residential uses surrounding the site.
- > Para 17.47 – Point 3 should be amended to say '*development should have regard to the A21 Development Framework which provides guidance for development on land to the rear of the existing buildings on the site*'. The A21 Development Framework is a SPD (Supplementary Planning Document) with less weight given to these guidance's than development plan documents in decision making and therefore it is too prescriptive to say development 'must' conform to it.

## Summary

Overall, PCH are generally supportive of the draft Local Plan and welcomes the site allocation of the Catford Police Station site and the acceptance, in principle, that new development can be brought forward on this site. However, the current drafting and wording of the site allocation for (9) Catford Police Station in Part Three, Chapter 17 of Local Plan Regulation 19 appears to rely on the capacity study undertaken in the A21 Development Framework and not the standard method approach outlined in the Site Allocations Background Paper (2021), or a design led approach that will be adopted by PCH in delivering a scheme for the site.

The A21 Development Framework study only provides guidance on development capacity for land to the rear of the site allocation and does not include or add potential capacity (either through reuse or reuse with extension) of the retained Locally listed police station buildings fronting the A21 which are also located in the site allocation boundary and will contribute to overall site capacity.

PCH strongly believes that the full range of evidence base should be used to determine a more appropriate site capacity in the Local Plan Regulation 19. As this representation shows, there are several additional evidence sources that indicate the site can reasonably accommodate a higher development capacity than is currently identified in the Local Plan. Given PCH's plan to deliver affordable housing on this site, Officers are encouraged to re-appraise the evidence summarised in this letter to identify a more justified development capacity for the Catford Police Station site allocation and to put forward amendments in a modification to the Plan.

## Appendix 1: Standard Method Calculation

**TABLE 6.1 – London-wide SHLAA density assumptions (dwellings per hectare)**

Setting	PTAL 0-1	PTAL 2-3	PTAL 4-6
<b>Standard density assumptions</b>			
Suburban	65	80	115
Urban	80	145	225
Central	100	210	355
<b>Town centre density assumptions</b>			
Suburban	-	-	-
Urban	95	170	260
Central	110	240	405
<b>Opportunity area density assumptions</b>			
Suburban	80	145	225
Urban	100	210	355
Central	250	350	450

*Figure 1: London Wide SHLAA density assumptions (extract from the Background Paper (2021))*

### Site Allocation Details

Setting – Urban

PTAL – 3/4

Site Area – 0.32ha

### Calculation

$$145 * 0.32 = 46.4$$

This provides a crude site capacity of 46 units based on the majority of the site being PTAL 3, however, a small part of the site is classified as PTAL 4 and therefore, through the design led approach, higher densities may be appropriate. The below calculation shows the capacity with a PTAL of 4

$$225 * 0.32 = 72$$



## Appendix 2: Site Capacity Study in the A21 Development Framework

### Potential Development Sites: Southend Character Area

Site 11 - Catford Police Station

Capacity study



Fig. 1 Aerial site diagram

Site information	
Draft Local Plan site allocation	Lewisham South Area Site allocation 14
Ownership	Public
Site area	0.32ha
PTAL	3-4
Indicative capacity	39 residential units 487m <sup>2</sup> non-residential floorspace
Planning designations and site considerations	Archaeological Priority Area, Air Quality Management Area, Flood Zones 1 and 2, Critical Drainage Area
Current use	Police Station
Character Area Framework	Southend Character Area Framework (from p. 52)

# Potential Development Sites: Southend Character Area

## Site 11 - Catford Police Station

### Capacity study

Key:

- Disabled parking
- Green space
- Communal amenity space / playspace
- > Service access

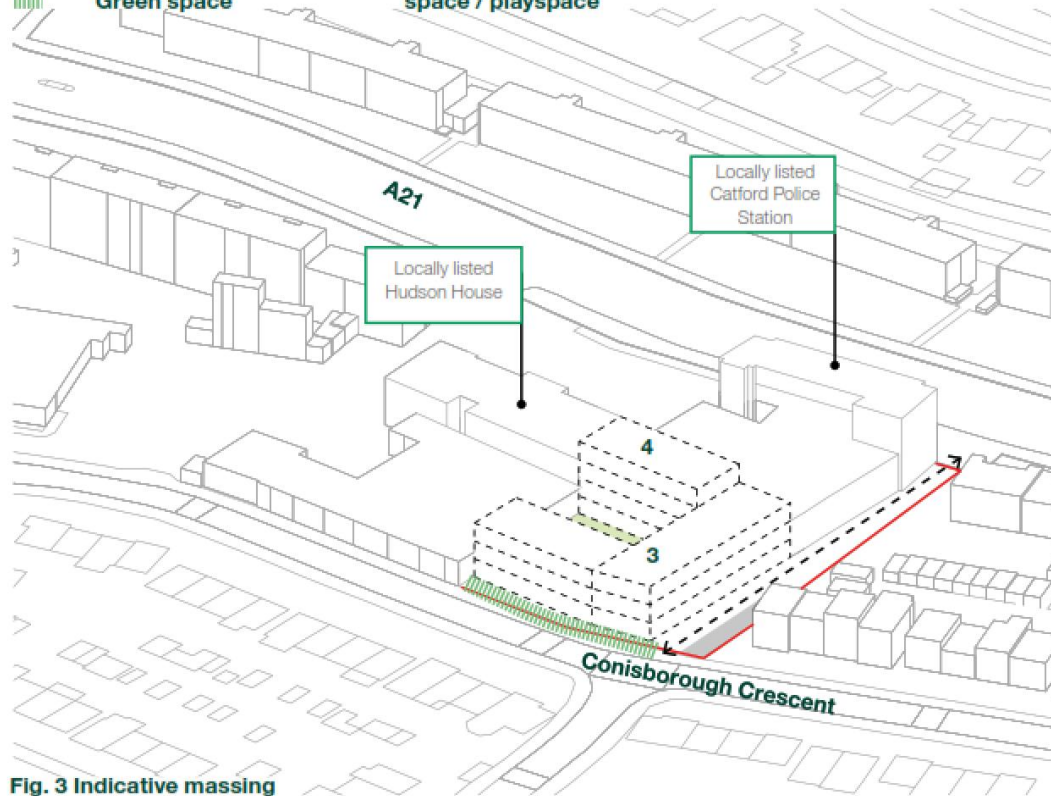


Fig. 3 Indicative massing

### Relevant precedents



Fig. 4 Contemporary terrace design, Dujardin Mews, Enfield, London EN3 4FJ



Fig. 5 Contemporary terraces with upper floor outdoor space, Cartwright Mews, Charlton, London SE7 8FJ

# Potential Development Sites: Southend Character Area

Site 11 - Catford Police Station

Capacity study



Fig 6. Typical floor plan

Site capacity table

Unit Type	Number of units	% of total
1B1P	2	8%
1B2P	4	17%
2B3P	1	4%
2B4P	1	4%
3B5P	13	54%
3B6P	3	13%
<b>Total</b>	<b>24</b>	
<b>Added housing density</b>		<b>75 u/ha</b>

### Appendix 3 - Metropolitan Workshop Capacity Study (March 2023)

#### Option 1



Sketch Axonometric from west

Option 2

60 homes

4300 sqm Residential NIA

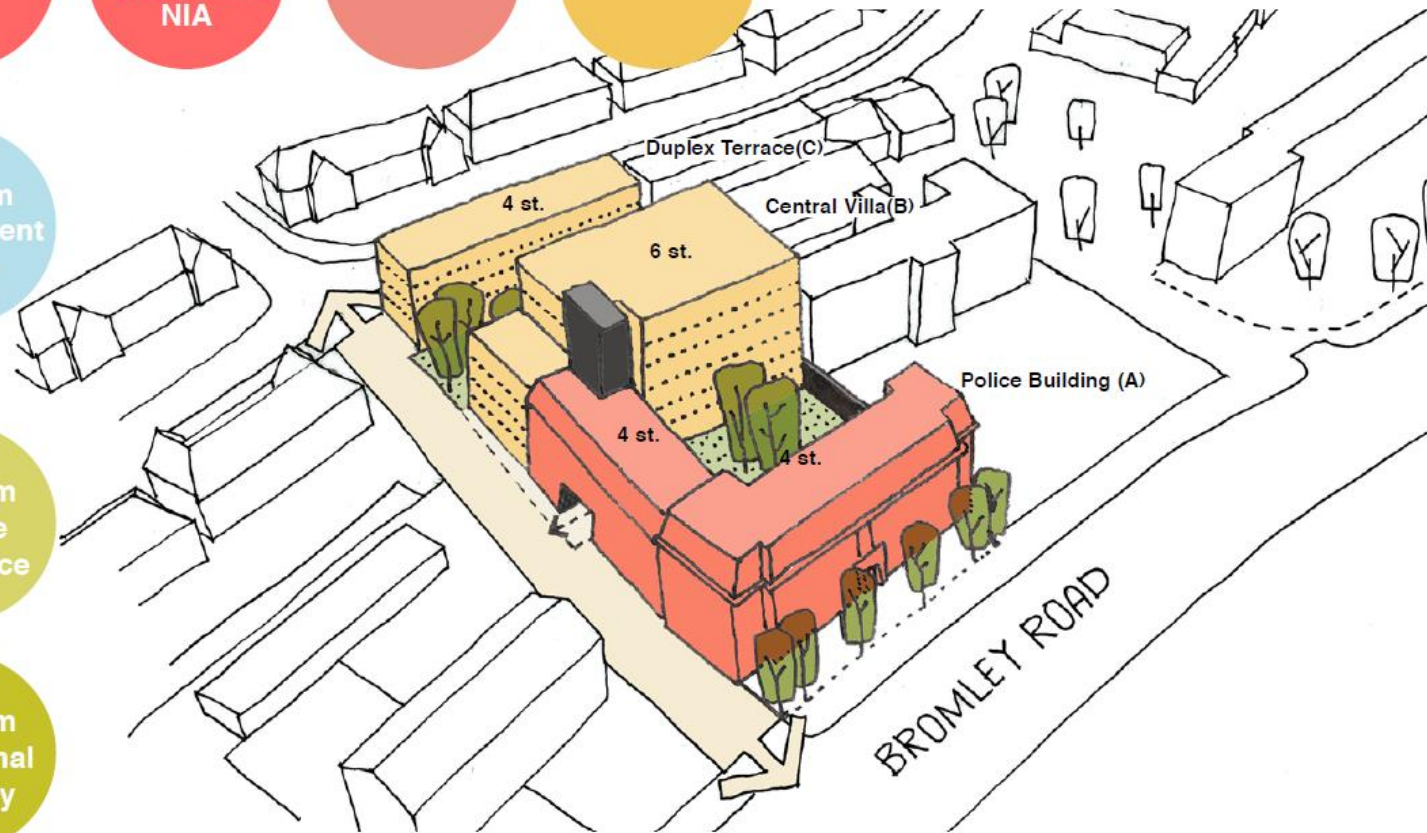
80% Net/Gross

36% 3bed +

128 sqm Employment Space

208 sqm On site Playspace

265 sqm Communal Amenity



Sketch Axonometric from west

NJ/P08170

Planning Service,  
London Borough of Lewisham  
Laurence House,  
1 Catford Road,  
London,  
SE6 4RU.

Sent via email to [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

Dear Sir/Madam

## **LB Lewisham Draft Local Plan Regulation 19 Consultation Representation on behalf of Apex Capital Partners**

Rolfe Judd Planning have been appointed by Apex Capital Partners to provide representations on London Borough of Lewisham's Regulation 19 consultation on the draft Local Plan. The Council is consulting until 25 April 2023 and we write to submit the following comments on behalf of our client, particularly in relation to draft site allocation LSA3 (1) Former Bell Green Gas Holders and Livesey Memorial Hall.

### **Allocation LSA3 (1) Former Bell Green Gas Holders and Livesey Memorial Hall**

Apex Capital Partners own the Livesey Memorial Hall and part of the former Bell Green Gas Holders, alongside a separate housing developer. As such, they are a significant landowner within the site allocation area.

The site is subject to draft allocation LSA3(1) for a

*'Comprehensive mixed-use redevelopment with compatible residential, commercial main town centre and community uses. Refurbished community facilities in heritage assets at Livesey Memorial Hall site. Public realm and environmental enhancements, including new walking and cycle routes, and public open space.'*

We are supportive of the allocation from the adopted Local Plan (Policy SA26) being retained and updated within the Draft Local Plan. We are also pleased to see that the allocation has been extended from the Reg-18 Draft Local Plan, to re-include the Livesey Memorial Hall and wider site.

Apex Capital Partners are currently proposing redevelopment of part of the site to provide residential development, new walking and cycling routes and public open space. As part of this we are proposing to protect and refurbish the Livesey Memorial Hall and associated bowling green to reinstate a community use at the site. This aligns with the Council's overarching vision for the site, as set out in Allocation LSA3(1).

A site plan, confirming the site's ownership boundaries and indicative layout of the scheme promoted by our client is shown below.

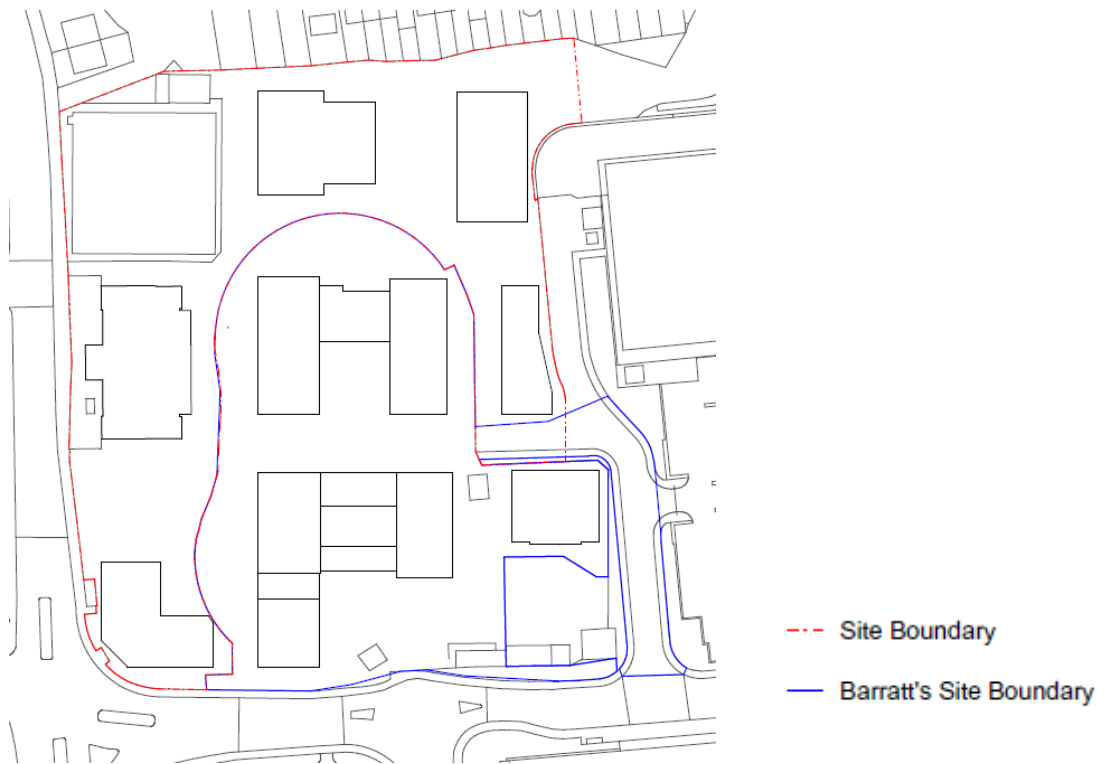


Figure 1: Site Plan: Ownership – Prepared by WestonWilliamson + Partners

## Development Requirements:

The draft allocation specifies a capacity of 100-442 new residential units. It should be noted that while the site is allocated as one land parcel, it is subject to multiple ownerships and therefore parts of the site could be delivered separately, rather than a single development across the whole allocation area.

This is recognised in Part 1 of the development's requirements, which states that landowners must work in partnership, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This is supported; however, we suggest that the wording is amended to state:

*'Where appropriate, landowners must work in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is recognised that developments may come forward at different timescales and in some circumstances, detailed partnerships may not be possible.'*

Part 2 states that the site must be fully re-integrated with the surrounding street network, including Perry Hill to the west, Alan Pegg Place to the south and forthcoming development to the east, to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site's surrounding neighbourhoods. This is supported and aligns with our client's wider, landscape led, approach. The scheme promoted by our client will link the site to an existing SINC to the north, which is referenced as an aspiration of the Council in Part 3 of the site allocation's development requirements. Delivery of a new public realm here, in collaboration with the Council, to produce a 'woodland walk' towards the Bellingham Play Park and Poole River link would be of beneficial use for local residents without impacting on the on-site heritage

assets of the Hall and Bowling Green.

Part 4 seeks developers provide a positive frontage to Alan Pegg Place and to the southwest corner at the junction of Alan Pegg Place and Perry Hill. This is supported and mirrors the scheme promoted by our client which provides ground floor active frontages and a gateway entrance to the site and its valuable community resources.

Part 6 relates to these valuable community resources, stating that development must be sensitive to the setting of the listed Livesey Memorial Hall and its curtilage open spaces and structures, and the listed boundary wall and War Memorial, and should incorporate it into the wider townscape by creating a positive relationship with new development. This is a key part of the scheme promoted by our client and the Council’s objective of retaining the Hall and its heritage significance is supported. The scheme promoted by our client ensures the character of the Livesey Memorial Hall, inside and outside, remains and can be repurposed for the future community use.

The final point of the site allocation’s development requirements refers to the site’s history and heritage relating to the South Suburban Gas Works. We support for this history to be revealed through the heritage assets and their curtilage and through hard and soft landscaping, architecture, public art and street/place naming, however as the larger site is within multiple ownerships, a sitewide strategy is unachievable. We suggest the wording removes reference to a sitewide strategy and is amended as follows:

*‘The history and heritage of the South Suburban Gas Works site should be revealed through ~~a site-wide interpretation strategy including~~ the heritage assets and their curtilage, re-use of the retained elements of the gasholder structures, and through hard and soft landscaping, architecture, public art and street/place naming.’*

### Developer Guidelines

Guidelines	Response
1. Development should deliver a more cohesive street pattern, in coordination with other neighbouring site allocations. There is an opportunity to open up new walking and cycle links to the east and south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas.	<p>Guideline supported however eastern links would depend on ownership and proposals of neighbouring site allocations.</p> <p>We consider the wording should be rephrased to include:</p> <p><i>‘in co-ordination with neighbouring site allocations where appropriate’.</i></p>
2. To achieve the optimal capacity of the site, development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo Line extension.	<p>The London Plan commits to extend the Bakerloo line on the Underground (tube) from Elephant and Castle to Lewisham via Old Kent Road and New Cross Gate. It is not confirmed when this extension will be implemented, and it is unlikely to happen in the next decade. The site benefits from very good public transport accessibility with several bus routes passing the site and a short walk to Lower Sydenham Station. Improved public transport in the area is supported and supports the wider intentions of the site allocation and neighbouring site allocations.</p> <p>The development currently being promoted by our client makes optimal use of the site and would not significantly impact on existing public transport capacity.</p>



<p>3. Applicants should consider increasing bus services through the site, in partnership with TFL.</p>	<p>This guideline is not appropriate in line with site's context, multiple landowners and allocations vision for the site to be landscape led with enhanced walking and cycle connections. We recommend this guideline is removed.</p>
<p>4. Development should be designed to provide an appropriate transition in bulk, scale and massing through the site and from the site to its surrounds, which are predominantly suburban in character to the north and west. Tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised. Tall buildings may be considered along the site's eastern boundary, where they can be designed so as to contribute positively to the street-scene and without detriment to the heritage assets on site.</p>	<p>This guideline is supported and development at the site should respond to the surrounding context, which varies in scale and massing. It is considered that taller buildings are also appropriate on the southern part of the site, where it sits away from heritage assets and adjacent to other adjacent development sites, namely Orchard Court. Notwithstanding this, the former gasholder structures on the site were tall structures and act as the context for the massing relationship to the Livesey Hall.</p> <p>We suggest the wording is rephrased to include:</p> <p><i>'Tall buildings may be considered along the site's eastern <b>and southern</b> boundary, where they can be designed so as to contribute positively to the street-scene and without detriment to the heritage assets on site. <b>The former gasholder structures on the site were tall structures and act as the context for the massing relationship to the Livesey Hall.'</b></i></p>
<p>5. Development must retain the listed structures at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site in a way that enhances their setting and improves access to the Livesey Memorial Hall. The hall should continue to be a focal point within the design of the site and be used as a community asset. Public realm and open space should form an integral part of the design of the site, ensuring that the open spaces in the curtilage of the Lively Memorial Hall to the north (bowling green) and south (tennis courts) are retained as open space, ancillary to the use of the hall.</p> <p>Public access through and from the site to the nearby Waterlink Way and SINC should also be integral to the site's layout and design.</p>	<p>This is a key part of the scheme being promoted by our client and the objective of retaining the Hall and its heritage significance is supported. The emerging scheme promoted by our client will protect the Livesey Memorial Hall, both internally and externally and will ensure it can be used for future community use. However, when seeking to retain both the historic structures and important open areas the allocation should acknowledge the need to balance the safeguarding of the Livesey Memorial Hall as well as the need to deliver much needed housing in line with the site allocation.</p> <p>We suggest the wording is amended to the following:</p> <p><i>'Public realm and open space should form an integral part of the design of the site. <del>ensuring that,</del></i></p> <p><i><b>Subject to appropriate justification, the open spaces in the curtilage of the Livesey Memorial Hall to the north (bowling green) and south (tennis courts) will be sought for retention <del>are retained</del> as open space, ancillary to the use of the hall.'</b></i></p> <p>Public access is supported and aligns with the owner's wider landscape led approach. The emerging scheme promoted by our client will link the site to an existing SINC to the north of the site. Delivery of a new public realm here, in collaboration with the Council, would be of beneficial use for local residents creating a 'woodland walk' towards the Bellingham Play Park and Poole River link without</p>

	impacting on the on-site heritage assets of the Hall and Bowling Green.
6. The site is constrained by existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas 'governor' and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site.	<p>This guideline is supported however it should also acknowledge that the Health and Safety Executive (HSE) would need to be party to the revoking of the Hazardous Substances Consent (HSC) and that the license as we understand it can only be revoked by Lewisham Council. We have experience of other gasholder facilities where a Grampian-style planning condition prevents occupation of the development until the license has been revoked. There may be compensation associated with the revoking of such license.</p> <p>We suggest the wording is rephrased to include:</p> <p><i>'The Council recognises the challenges associated with significant decontamination and remediation of the site and the Council will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).'</i></p>
7. Development proposals should investigate opportunities to deliver a decentralised energy network.	This guideline is supported.
8. Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the trunk sewers will not be allowed.	This guideline is supported, acknowledging that this condition is applied to all applications associated with the site to ensure that all development appropriately contribute to the upgrading of utility capacity.

### Conclusions

To summarise, we suggest several amendments to the wording of the site allocation. These are summarised in the table below.

Para ref	Original Wording	Revised Wording
17.17(1)	<i>'Landowners must work in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development).'</i>	<i>'Where appropriate, landowners must work in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is recognised that developments may come forward at different timescales and in some circumstances, detailed partnerships may not be possible.'</i>

17.17 (7)	<i>'The history and heritage of the South Suburban Gas Works site should be revealed through a site wide interpretation strategy including the heritage assets and their curtilage, re-use of the retained elements of the gasholder structures, and through hard and soft landscaping, architecture, public art and street/place naming.'</i>	<i>'The history and heritage of the South Suburban Gas Works site should be revealed through <del>a site wide interpretation strategy including</del> the heritage assets and their curtilage, re-use of the retained elements of the gasholder structures, and through hard and soft landscaping, architecture, public art and street/place naming.'</i>
17.18(1)	<i>'Development should deliver a more cohesive street pattern, in coordination with other neighbouring site allocations. There is an opportunity to open up new walking and cycle links to the east and south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas.'</i>	<i>'Development should deliver a more cohesive street pattern, in coordination with other neighbouring site allocations <b>where appropriate</b>. There is an opportunity to open up new walking and cycle links to the east and south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas.'</i>
17.18(3)	<i>'Applicants should consider increasing bus services through the site, in partnership with TFL.'</i>	<i><del>'Applicants should consider increasing bus services through the site, in partnership with TFL.'</del></i>
17.18(4)	<i>'Development should be designed to provide an appropriate transition in bulk, scale and massing through the site and from the site to its surrounds, which are predominantly suburban in character to the north and west. Tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised. Tall buildings may be considered along the site's eastern boundary, where they can be designed so as to contribute positively to the streetscene and without detriment to the heritage assets on site.'</i>	<i>'Development should be designed to provide an appropriate transition in bulk, scale and massing through the site and from the site to its surrounds, which are predominantly suburban in character to the north and west. Tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised. Tall buildings may be considered along the site's eastern <b>and southern</b> boundary, where they can be designed so as to contribute positively to the street-scene and without detriment to the heritage assets on site. <b>The former gasholder structures on the site were tall structures and act as the context for the massing relationship to the Livesey Hall.</b></i>
17.18(5)	<i>'Development must retain the listed structures at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site in a way that enhances their setting and improves access to the Livesey Memorial Hall. The hall should continue to be a focal point within the design of the site and be used as a community asset. Public realm and open space should form an integral part of the design of the site, ensuring that the open spaces in the curtilage of the Lively Memorial Hall to thenorth (bowling green) and south (tennis courts) are retained as open space, ancillary to the use of the hall. Public access through and from the site to the nearby Waterlink Way and SINC should also be integral to the site's layout and design.'</i>	<i>'Development must retain the listed structures at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site in a way that enhances their setting and improves access to the Livesey Memorial Hall. The hall should continue to be a focal point within the design of the site and be used as a community asset. Public realm and open space should form an integral part of the design of the site <del>ensuring that</del>. <b>Subject to appropriate justification</b>, the open spaces in the curtilage of the Livesely Memorial Hall to the north (bowling green) and south (tennis courts) <del>are retained</del> <b>will be sought for retention</b> as open space, ancillary to the use of the hall. Public access through and from the site to the nearby Waterlink Way and SINC should also be integral to the site's layout and design.'</i>
17.18(6)	<i>'The site is constrained by existing utilities restrictions, easements; a Hazardous</i>	<i>'The site is constrained by existing utilities restrictions, easements; a Hazardous Substances</i>

	<p><i>Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas ‘governor’ and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site.’</i></p>	<p><i>Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas ‘governor’ and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site <b>and the Council will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).</b></i></p>
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In conclusion we are supportive of draft allocation LSA3(1). The site provides great opportunity to restore a community use and contribute to the recognised housing need. We would welcome the opportunity to meet with the Lewisham Policy team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework.

We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully

*Nia Jardine*

For and on behalf of  
Rolfe Judd Planning Limited

Planning Service  
Laurence House  
1 Catford Road  
Catford  
London  
SE6 4RU

Our Ref: *PL22-094*  
Your Ref:  
Email: *Robert.mgrieve@fairview.co.uk*

24<sup>th</sup> April 2023

Dear Sir/Madam,

**Re: Lewisham Local Plan: Proposed Submission Document – Regulation 19 Representation Part 3 Lewisham’s South Area Site Allocations Site 10 Homebase/Argos Bromley Road**

Following the release of Lewisham Reg 19 Local Plan: Proposed Submission document, Fairview are writing on behalf of the current Landowner to support the proposed allocation of the Homebase/Argos, Bromley Road. Nevertheless, we consider that the current allocation does not maximise the site potential meaning the existing proposed allocation is unsound.

The London Plan has set a 10 year strategic housing target for Lewisham of 16,670 or 1,667 completions per year. In addition to this, Lewisham needs to cater for its current backlog and provide a 5% buffer (soon to be 20%) in accordance with the NPPF. Therefore, the Council should be seeking to maximise housing delivery on all proposed allocations, including the Homebase/Argos Bromley Road site.

**The Site**

The site is approximately 1.70ha and currently comprises a large retail warehouse with car parking, service yard and a pond. A sports club including Tennis courts and playing fields (allocated Urban Green space) are located immediately to the west, while Bromley Road and Beckenham Hill form the sites southern and eastern boundary. Rear gardens of the residential properties which front Southend Lane adjoin the site to the north. The site is not in a Conservation area, although St Johns Church (Grade II Listed Building) is located to the east on the opposite side of Bromley Road.

Land uses surrounding the site are predominantly residential with associated green space. This ranges from traditional two storey semi-detached properties to the south (Beckenham Hill Road) and northwest (Southend Lane), three storey flats to the south (Beckenham Hill Road) and north east (Bromley Road) and then taller modern flatted developments to the north. The taller developments include:

- Deslandes Place (five storeys)
- Nayland House (eight storeys)
- Astral House (six to nine storeys)

The closest train station is Beckenham Hill which is 360m to the southwest. The Site is also located within short walking distance of several bus stops, the closest being located directly outside the Site on Beckenham Hill Road.

### **Current Allocation**

The site as allocated is identified as an out of town centre retail unit and car park. Additionally, the allocation confirms the site is 1.70(ha) and located in an urban setting with a PTAL of 3. An indicative capacity of 141 residential units and 5,694sqm of retail use has been identified.

Within the allocations supporting text, the site is identified as benefiting from good levels of transport accessibility and its redevelopment offers scope for public realm improvements to support walking and cycling. Several development requirements are set out in the allocation including, the proposals coming forward in accordance with the A21 development framework, introducing positive frontages along Bromley Road and Beckenham Hill, re-integration into the surrounding street network, delivering new and improved public realm and open spaces, and seeking to enhance green infrastructure.

Overall, the current allocation does not ensure the optimal capacity for the site will be delivered. The allocation therefore does not comply with National, Regional, and other emerging policies within the Reg 19 plan (specifically QD6 Optimising site capacity). The allocation in its current form is therefore unsound.

### **Revised Allocation**

Fairview has undertaken a capacity study of the site, which has demonstrated that the site has capacity for c.350 dwellings and up to 250sqm of Class E floorspace. The emerging allocation should therefore be revised to ensure this can be achieved.

350 dwellings and up to 500sqm of retail floorspace is achievable within the existing site constraints. Within the emerging plan, the site is identified as a location with some suitability for tall buildings. Based on this, the site is suitable for some 10 storeys elements with the remainder between 6 and 8 storeys. These heights are similar to surrounding developments such as Astral House and are therefore within the character of the local area.

A scheme of this quantum allows for the retention and improvement of the existing pond and provides improvements to support walking and cycling as currently required by the allocation. Additionally, the proposed retail provision could be located along Beckenham Hill Road, providing the positive active frontage sought.

The revised allocation would result in an increased density of 205 dwellings per hectare which is more appropriate for the site, especially considering its proximity to Beckenham Hill Station.

The following revisions are required for the allocation to be considered sound:

- A decrease in the amount of retail floorspace being re-provided; and
- An increase in the proposed indicative residential capacity.

### **Reduced Retail Provision**

As part of the revised allocation, it is recommended that the amount of retail floorspace proposed to be re-provided is reduced to reflect the present and future retail demand.

In our experience, there is currently extremely limited demand for large scale out of centre retail warehouse developments, with many large footplate stores underperforming to the

extent that operators consider the stores unviable. This is evidenced by the number of Homebase stores which have been redeveloped in the last 5 years. Since August 2018, when 42 initial stores were put on the market, with a few exceptions, all have been redeveloped. Including two by Fairview New Homes. Therefore, from a developer perspective there is no justification for providing a similar size store to the existing homebase.

Additionally, as identified in the Lewisham Retail Impact Assessment and Town Centre Trends Report produced by Lichfields (December 2021), due to market conditions, the *'bulky goods warehouse sector has rationalised'* and *'scaled down store sizes.'* This is particularly the case for premises within the bulky goods sector (which includes DIY goods) where demand for premises *'has been particularly weak in recent years.'* This has led to voids in retail warehouse parks and proposals to extend the range of goods sold to non-bulky. Lichfields forecast this pressure to shift from bulky to non-bulky comparison goods is likely to continue which shows a lack of demand for Homebase type stores.

The lack of desire for large retail warehouses is also supported in policy. The site does not form part of an allocated (currently or emerging) Major, District or Local Centre and does not form part of a primary shopping area. It is therefore not protected by planning policy. Additionally, the site is over 300m from a primary shopping area or town centre boundary. Therefore, in retail terms, the site is an out of centre location.

Both national and emerging local policies identify that town centres are at the heart of communities and developments should support and help to secure the long-term vitality and viability of town centres (emerging policy EC11). Emerging policy EC12 will also result in the adoption of a 'town centre first' approach for main town centre uses with sequential testing required for all retail uses and retail impact assessments required for retail uses of 500sqm gross floorspace or more at out of centre locations. The emerging policy states that development proposals will be refused unless the impact assessment identifies a need and market demand for the amount and type of floorspace proposed and the proposals will not adversely impact the vitality and viability of Lewisham town centre network and hierarchy. Therefore, emerging local plan does not support out of centre retail development.

Furthermore, Lichfields' report states that should the comparison goods floorspace within retail warehouses not be replaced (following redevelopment), *'then comparison goods expenditure should be released for other shopping destinations... This released comparison good trade could assist growth in shopping facilities within the main centres in Catford and Lewisham'* - town centre locations supported by emerging policies. The report also identifies that when commercial floorspace is re-provided on retail warehouse redevelopments, it is normally flexible and at a scale commensurate with the amount of residential and employment uses within the development.

Therefore, the current proposed allocation of 5,694sqm is not supported by market conditions, emerging policy or the Council's evidence base. Rather, the Council's Retail Impact Assessment supports the provision of a smaller more flexible amount of commercial floorspace with the aim of serving the proposed development. Up to 500sqm is therefore suitable for the site and sound, based on the supporting evidence for the emerging local plan.

## **Housing Need**

As recognised in the emerging local plan, the Mayor of London has challenged all London Boroughs to deliver a significant increase in housing to meet current and future needs across the Capital. For Lewisham, the London Plan has set a 10 year strategic housing target of

16,670 net housing completions (1,667 per annum). However, as this does not identify the housing need for the Borough beyond 2029, the Council has considered it appropriate to ‘roll-forward’ the Borough’s London Plan annual housing target to produce a 15-year target of 27,730 or 1,667 per annum.

Supporting paragraph 7.4, states the emerging Local Plan has identified specific site allocations which have the potential capacity to deliver 24,413 (1,221 per annum) over the lifetime of Plan (20 years). To make up for the shortfall against the London Plan target, the Council are relying on existing consented sites and the historic trend-based windfall delivery rates to make up for any short coming over the plan period.

We consider this approach is unsound and fails to adequately consider the Boroughs most recent trends in housing delivery which was substantially below London Plan targets (2021-22 Monitoring Report). The Monitoring Report identifies the Council only achieved 88% of its housing target in 2021 and 87% 2022. Both only slightly above the national threshold for the introduction of the 20% buffer. The report concludes it will become increasingly challenging for the Council to meet the Housing Delivery Test in future years, given the low level of completions in recent years and that Lewisham ‘needs to start planning for a 20% buffer in the near future’.

Furthermore, supporting Paragraph 7.4 also acknowledges the need for critical strategic transport infrastructure, particularly the Bakerloo Line extension, to unlock the development potential of areas and to optimise the capacity of sites. Should this infrastructure be delayed, it will result in considerable shortfall in the housing supply with allocated sites being unable to come forward within the lifetime of the emerging plan.

For these reasons it is fundamental that the Council ensure that all emerging allocations have been fully optimised to ensure that there is a sufficient buffer to accommodate sites being delayed, falling away and to make up for the recent shortfall in delivery. If the plan does not do this, it is not sound.

Currently the Homebase/Argos Bromley Road allocation has a density of 82 dwellings per hectare (dph). The table below provides a summary of similar sites within Lewisham’s South Area with a similar or worse PTAL to the Homebase/Argos site:

Site Allocation	Number of Units	Site Area	PTAL	dph
Former Bell Green Gas Holders and Livesey Memorial Hall	442	2.16	2	205
Bell Green Retail Park	1831	7.37	1b-2	248
Sainsbury’s Bell Green	1,347	5.42	2-3	249
Stanton Square Locally Significant Industrial Site	231	0.97	3	238
Sydenham Green Group Practice	87	0.49	2-3	178
Worsley Bridge Road Locally Significant Industrial Site	179	1.26	2-3	142

The table demonstrates that each of these sites benefits from a far higher dph despite having a similar or worse PTAL. Whilst density is only a guide, our own designs demonstrate that a scheme of 350 dwellings is deliverable on the proposed allocation.



Our proposed amendment to the allocation would increase the allocations density to 205 dwellings per hectare in line with above allocations. We therefore contend that this is an acceptable density for a PTAL 3 site within the southern area.

Revising the emerging allocation to c.350 units will assist the Council in meeting its on-going housing need, by fully optimising the site and allowing the allocation to be considered sound.

### **Conclusion**

Lewisham Council has allocated Homebase/Argos Bromley Road to provide 141 residential units and 5,694sqm of retail use. We consider the current allocation does not optimise the site to deliver the maximum number of homes and retains comparison retail floorspace where it is not supported by market demand, emerging policies or the Council's evidence base. This results in the Council failing to plan positively to address it's housing need, leading to the allocation being unsound.

Fairview considers the optimal capacity of the site is c.350 dwellings and up to 250sqm of Class E floorspace. The emerging allocation should, therefore, be revised to reflect this and ensure the optimal capacity is achieved. Following these amendments, we consider the emerging Local Plan would be sound in respect to this allocation.

Should you require any further information, or wish to discuss the site in more detail, please do not hesitate to contact me.

Yours faithfully,



**Mark Jackson BA (Hons) Dip UPS (Dist) MA.UD MRTPI**

Director of Planning - Fairview Estates (Housing) Ltd

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**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

Title	<input type="text" value="Mr"/>	Address Line 1	<input type="text" value="Fairview New Homes"/>
First Name	<input type="text" value="Robert"/>	<input type="text" value="50 Lancaster Road"/>	
Last Name	<input type="text" value="Mackenzie-Grieve"/>	Line 2	<input type="text" value="Enfield"/>
Job Title	<input type="text" value="Senior Planner"/>	Line 3	<input type="text" value="Middlesex"/>
Organisation	<input type="text" value="Fairview New Homes"/>	Line 4	<input type="text"/>
Telephone number	<input type="text" value="02083661271"/>	Post code	<input type="text" value="EN2 0BY"/>
		E-mail Address	<input type="text" value="robert.mgrieve@fairview.co.uk"/>

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

- |   |  |
|---|--|
| <b>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</b>   | Chapter name<br><input type="text" value="Part 3 Site Allocations"/>                 |
| <b>2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</b> | Policy name/number<br><input type="text" value="10 Homebase/Argos Bromley Road"/>    |
| <b>3. Do you consider that this part of the chapter is legally compliant?</b>   | Yes <input checked="checked" type="checkbox" value="X"/> No <input type="checkbox"/> |
| <b>4. Do you consider that this part of the chapter sound?</b>  | Yes <input type="checkbox"/> No <input checked="checked" type="checkbox" value="X"/> |
| <b>5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate?</b>   | Yes <input checked="checked" type="checkbox" value="X"/> No <input type="checkbox"/> |
| <b>6. Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.</b>  |  |

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.*

**Continue answer on separate sheet if necessary.**

Please see attached covering letter

**7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

Please see attached covering letter

**8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

**9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.***

20 April 2023

**REPRESENTATIONS BY HOMEBASE LTD TO THE REGULATION 19 VERSION OF LEWISHAM LOCAL PLAN IN RELATION TO HOMEBASE, BECKENHAM HILL ROAD, CATFORD**

My clients, HHGL Ltd trading as Homebase in the UK & Ireland, submitted representations to the Main Issues & Preferred Approaches Version of the Lewisham Local Plan (Reg.18 Plan) on 5 May 2021. This was followed by a Virtual Teams Meeting (VTM) with Officers on 10 June 2021 during which we outlined Homebase's position in relation to their existing store on Beckenham Hill Road in Catford.

In summary, my clients representations confirmed that: their current lease on the Catford store extended to September 2025; that the store was successful and profitable with a loyal customer base and experienced staff; and that Homebase were committed to retaining representation within the Catford area to serve the existing customer base in the Borough of Lewisham.

Accordingly, my clients representations to the Reg.18 Plan, reemphasised in the subsequent VTM, sought to ensure that Policy LSA4 and Site Allocation 10, which identified the Homebase as part of an opportunity site for a residential led mixed-use scheme of 141 residential units and 5,694 square metres of main town centre uses, took on board and reflected Homebase's commitment to remaining on their Beckenham Hill Road site as this was a well-established retail destination and successful store. As the draft wording of policy LSA4 and Site Allocation 10 did not recognise that commitment or provide the option for Homebase remaining on site, either as is or as part of a residential led redevelopment my clients confirmed that they strongly objected to the Reg.18 Plan.

Within the Regulation 19 Version of the Plan the wording of Site Allocation 10 (*'Homebase/Argos, Bromley Road'* – the reference to *'Argos'* should be deleted as this concession no longer trades from the store) has been amended with paragraph 17.52 1. stating that the *"Re-provision of the existing retail use is acceptable"* providing other objectives for redeveloping the site can be achieved. Whilst my clients would support this change, they consider that the wording should go further so that it provides greater clarity and certainty. We would request, therefore, that paragraph 17.5 1. be amended to include the following:

- Reference that the re-provision of the existing retail use could include a store of approximately 2,323 sqm gross with an additional garden centre of 743 sqm gross.
- Reference that any re-provision of the retail use must meet the operational and business requirements of the tenant and be commercially viable.
- Inclusion of the option of Homebase remaining on site (the status quo) and where it cannot be successfully incorporated within any redevelopment scheme the option of Homebase being relocated to an alternative site within the area.

We would be happy to discuss these requested changes further with Officers prior to the EIP.



## **Lewisham Local Plan: Proposed Submission Document – Regulation 19 Consultation Guidance Note**

The Local Plan will play a vital role in how we manage new development and coordinate investment. Throughout the preparation of the plan, we have sought to ensure that everyone with an interest in Lewisham has had the opportunity to help shape the new plan.

A Regulation 19 consultation is the next stage of the Local Plan consultation process. As part of the Regulation 19 consultation, we have prepared the **Local Plan: Proposed Submission Document** for public consultation which has been informed by the previous consultation and engagement exercises we have undertaken for the new plan. This includes public consultations on the Issues and Options document in October - November 2015, the Main Issues and Preferred Approaches Document in January - April 2021, Call for Sites exercises and engagement on evidence base documents.

During this consultation the Local Plan: Proposed Submission Document and its supporting documents will be made available for public inspection to provide any individual, group, or business the opportunity to make a representation.

This Guidance Note should be read in conjunction with the Statement of Representation Procedure.

Title of documents available for inspection and subject to this consultation:

- Lewisham Local Plan: Proposed Submission Document January 2023.
- Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022.
- Integrated Impact Assessment and Non-technical Summary December 2022.
- Habitats Regulations Assessment December 2022

This consultation will require submissions to specifically focus on the following issues:

### **Is the Plan Legally Compliant?**

Does the Plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?

The Planning Inspector will first check that the Local Plan meets the legal requirements of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) and the Regulations before moving on to consider the tests of soundness.

The Local Plan must meet the legal requirements under sections 19,20 and 24 of the Act, and duty to cooperate under section 20(5)(c) of the Act. To be legally compliant, it should:

- Be prepared in accordance with the Council’s Local Development Scheme (LDS).
- Be prepared in accordance with the Statement of community Involvement (SCI).
- Comply with the Regulations.
- Be supported by a Sustainability Appraisal (SA) report.
- Have regard to national policies and advice.
- Be in general conformity with the London Plan.

**Does the Plan comply with the ‘Duty to Cooperate’?**

Lewisham Council must have demonstrated how it engaged constructively, actively and on an ongoing basis with adjoining Local Planning Authorities and other public bodies throughout the production of the Local Plan.

**Is the Plan Sound?**

Has the Plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

The National Planning Policy Framework (NPPF) (para.35) sets out that in order to be ‘sound’ a Local Plan should pass the following tests:

<b>Be positively prepared</b>	Providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development.
<b>Be Justified</b>	An appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence.
<b>Be Effective</b>	Deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred.
<b>Be consistent with national policy</b>	Enabling the delivery of sustainable development in accordance with the policies in the NPPF.

## How to complete the representation form

In submitting a representation, you will need to complete an online or physical representation form. When completing the form please:

- Complete a new representation form for each issue you wish to comment on.
- Clearly identify which policy or part of the Plan your representation relates to.
- Indicate by ticking the relevant box if you wish to speak at the Examination.

## Where can I inspect the Local Plan and its supporting documents

You can inspect physical copies of the documents, the Consultation Statement main report and appendices and the Statement of Representations Procedure as well as other supporting documents at the following locations:

- London Borough of Lewisham, Laurence House, 1 Catford Road, London, SE6 4RU.
- Catford Library, Catford Centre, 23-24 Winslade Way, London, SE6 4JU.

If you wish to inspect the documents at Laurence House, please make an appointment by emailing [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk) or calling 02083147400

(Please note that you need to make an appointment by e-mailing [LocalPlan@Lewisham.gov.uk](mailto:LocalPlan@Lewisham.gov.uk) if you wish to inspect the Plan and its supporting documents at Laurence House).

You can inspect physical copies of the documents, the Consultation Statement main report excluding the appendices and the Statement of Representations Procedure at the following locations:

- Deptford Lounge Library, 9 Giffin Street, London, SE8 4RJ.
- Grove Park Community Centre, Somertrees Avenue, London, SE12 0BX.
- Forest Hill Community Library, Dartmouth Road, London, SE23 3HZ.
- Downham Library, 7-9 Moorside Road, Bromley, BR1 5EP.
- Lewisham Library, 199-201 Lewisham High Street, London, SE13 6LG.

Information on Library opening times can be found at: <https://lewisham.gov.uk/myserVICES/libraries/branches> or by calling 02083147400.

## Online Meetings

The Council will be holding two online information sessions from 6.00pm to 8.00pm on Thursday 16<sup>th</sup> March 2023 and from 6.00pm to 8.00pm on Thursday 23<sup>rd</sup> March 2023. To register your interest, please use this link:

<https://consultation.lewisham.gov.uk/planning/reg19consultation>

## Local Plan Drop in sessions

There will also be a drop-in session at Unit 69 East Mall, Lewisham Shopping Centre from 10.00am to 4.00pm on Saturday 25<sup>th</sup> March 2023. Further information can be found at: <https://consultation.lewisham.gov.uk/planning/reg19consultation>



## **Have your say**

The consultation is open from **1<sup>st</sup> March 2023 to 25<sup>th</sup> April 2023**.

For further information and to have your say, visit:

<https://consultation.lewisham.gov.uk/planning/reg19consultation>

Email - [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

Complete the following questionnaire and return to: Planning Service, Laurence House, 1 Catford Rd, Catford, London, SE6 4RU.

Representations must be received by **midnight on Tuesday 25<sup>th</sup> April 2023**.

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential. All representations will then be submitted to the Secretary of State for Levelling Up, Housing and Communities and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

### **What happens next?**

All representations received will be recorded and considered and the representations will be submitted to an independent examiner. In addition, all comments will be recorded and collated within a Consultation Statement.

Further information on the plan process is set out in the adopted Local Development Scheme:

<https://councilmeetings.lewisham.gov.uk/documents/s105304/LDS%20Appendix.pdf>

### **Thank You**

We would like to thank you for your support and involvement so far as we invite you once again to comment on our Local Plan and supporting documents before we submit them to the Secretary of State for independent examination.

**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

Title	<input type="text"/>	Address Line 1	<input type="text" value="34 Above Town"/>
First Name	<input type="text" value="Gareth"/>		<input type="text"/>
Last Name	<input type="text" value="Roberts"/>	Line 2	<input type="text" value="Dartmouth"/>
Job Title	<input type="text" value="Director"/>	Line 3	<input type="text" value="Devon"/>
Organisation	<input type="text" value="G R Planning Consultancy"/>	Line 4	<input type="text"/>
Telephone number	<input type="text"/>	Post code	<input type="text" value="TQ6 9RG"/>
		E-mail Address	<input type="text" value="grplanning@globalnet.co.uk"/>

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the [Lewisham Local Plan - Proposed Submission Document](#) and its supporting documents in due course.

1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate? Chapter name
2. To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below) Policy name/number
3. Do you consider that this part of the chapter is legally compliant? Yes  No
4. Do you consider that this part of the chapter sound? Yes  No
5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate? Yes  No
6. Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.*

**Continue answer on separate sheet if necessary.**

[See separate pdf with representations on behalf of HHGL Ltd reading as Homebase in the UK & Ireland and dated 20 April 2023](#)

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

See separate pdf with representations on behalf of HHGL Ltd trading as Homebase in the UK & Ireland and dated 20 April 2023

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.*

See separate pdf with representations on behalf of HHGL Ltd trading as Homebase in the UK & Ireland and dated 20 April 2023

**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

Title	<input type="text" value="Mr"/>	Address Line 1	<input type="text" value="33 Margaret Street"/>
First Name	<input type="text" value="Chris"/>		<input type="text"/>
Last Name	<input type="text" value="Moore"/>	Line 2	<input type="text" value="London"/>
Job Title	<input type="text" value="Associate Director"/>	Line 3	<input type="text"/>
Organisation	<input type="text" value="Savills (UK) Limited"/>	Line 4	<input type="text"/>
Telephone number	<input type="text"/>	Post code	<input type="text" value="W1G 0JD"/>
		E-mail Address	<input type="text" value="crmoore@savills.com"/>

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

1. **To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?** Chapter name  
Managing Development
2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)** Policy name/number  
QD4
3. **Do you consider that this part of the chapter is legally compliant?** Yes  No
4. **Do you consider that this part of the chapter sound?** Yes  No
5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?** Yes  No
6. **Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.*

**Continue answer on separate sheet if necessary.**

Please see enclosed letter for full details of representations

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*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

Please see enclosed letter for full representations

**8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<small>(I do wish to participate in an examination hearing session)</small>	<small>(I do not wish to participate in an examination hearing session)</small>

**9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. Continue answer on separate sheet if necessary.**

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

1. **To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?** Chapter name  
Lewisham's South Area
2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)** Policy name/number  
10 - Homebase / Argos
3. **Do you consider that this part of the chapter is legally compliant?** Yes  No
4. **Do you consider that this part of the chapter sound?** Yes  No
5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?** Yes  No
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Please see enclosed letter for full details of representations



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Please see enclosed letter for full representations

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No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. **Continue answer on separate sheet if necessary.**

The Council's approach is not considered to be consistent with national policy or justified by the supporting evidence base. We consider these to be significant issues which require in-depth consideration and discussion. Specifically, this will assist the Inspector in understanding more fully the opportunities at the Homebase / Argos site on Bromley Road and the implications of the current allocation wording for the realisation of these.

25 April 2023  
L230425 SAV LBL Reps



Strategic Planning  
London Borough of Lewisham  
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London W1G 0JD  
T: +44 (0) 20 7499 8644  
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Submitted by email: [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

Dear Sir or Madam

## LONDON BOROUGH OF LEWISHAM LOCAL PLAN REGULATION 19 STAGE CONSULTATION REPRESENTATIONS MADE ON BEHALF OF SANTANDER C/O LASALLE INVESTMENT MANAGEMENT

### Introduction

We write on behalf of our client, Santander c/o LaSalle Investment Management, in respect of its land interests in land at 10 Beckenham Hill Road in Catford (the 'Site').

Our client has previously promoted the Site through earlier rounds of consultation for the emerging Local Plan. This included the submission of representations to the Regulation 18 stage consultation in April 2021.

This correspondence is submitted to provide a formal response to the Regulation 19 consultation on the Lewisham Local Plan Proposed Submission Document (January 2023).

In summary, our client supports the overarching aspirations for investment and growth within Lewisham as detailed within the Regulation 19 Draft Local Plan. This includes the identification of the Site as an allocation for comprehensive residential led mixed use redevelopment.

However, it **objects** to the identification of an indicative capacity of 141 residential units and 5,694 sq.m of gross non-residential floorspace on the basis that this would significantly limit the prospects of securing redevelopment due to the impact on overall scheme viability.

The indicative capacity figure appears to have been determined based on a crude calculation of density per hectare and does not take account of site specific conditions or constraints which would generate a requirement for finer grain analysis and consideration of higher densities and residential yield.

It follows that the allocation as drafted fails to optimise the development potential of the Site. This is in direct conflict with the aspirations of the London Plan and the overarching strategic objective to secure sustainable development and make most effective use of land as set out by national and local policy.

On this basis, the Regulation 19 Draft Local Plan as drafted does not meet the tests of soundness identified at Paragraph 35 of the National Planning Policy Framework ('NPPF'). Specifically, it is not justified or effective and is inconsistent with the provisions of the National Planning Policy Framework and the London Plan 2021.

In failing to plan positively to realise the potential / capacity of the Site the Council serves to place unnecessary and undue stress on other areas of the Borough and elsewhere in Greater London to meet an identified requirement for the delivery of new homes.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.  
Registered office: 33 Margaret Street, London, W1G 0JD

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Confidential

Our client strongly advocates that in order to help realise these aspirations and for the Local Plan to be found 'sound', the Council should make material amendments to the Local Plan in order to capture greater potential for the redevelopment and / or intensification of existing brownfield land such as that at the Site.

We trust that the content of this consultation response will be considered fully by the Local Planning Authority ('LPA') and afforded the appropriate level of weight in preparing the next version of the Local Plan.

Our client recognises the importance of the planning policy framework to help it and its partners realise their respective ambitions and look forward to working with the Council to develop an appropriate framework to create the certainty of outcome required to enable the Site to be brought forward for development with confidence.

### **The Site**

As set out above, our client's land ownership comprises the purpose built Homebase retail warehouse located off Beckenham Hill Road/Bromley Road in Catford.

The Site extends to circa 1.7 hectares and comprises previously developed land in the form of an existing retail store and associated car park. The principal vehicle access and egress to the Site is via Beckenham Hill Road with an additional exit only on to Bromley Road.

Land uses surrounding the Site are predominantly residential and range from traditional two storey semi-detached properties to the south and north-west, three storey flats to the south and north east and taller modern flatted developments of five to nine storeys located to the north.

To the east of the Site on the opposite side of Bromley Road is St Johns Church (Grade II listed), a two storey community building known as the Green Man and a Fiat garage. To the rear of the Site is Catford Wanderers Sports Club.

The Site has a PTAL Rating of 3 and therefore benefits from 'good' accessibility by a range of modes of public and sustainable modes of transport.

The Site is not in a Conservation area, although St Johns Church (Grade II Listed Building) is located to the east on the opposite side of Bromley Road.

The Environment Agency's flood risk map shows the majority of the site to be in Flood Zone 2 meaning that there is a medium probability of potential flooding.

### **Representations to the Local Plan Regulation 19 Consultation**

The Publication Draft Local Plan consultation seeks to identify sites to meet Lewisham's need for housing, employment sites and other uses.

It is further stated that Allocations are identified as the key sites which are considered to assist with the delivery of the Borough's Spatial Strategy which targets the provision of a minimum number of new homes over the Local Plan period.

Whilst our representations are focussed primarily on the proposed wording for the draft allocation for the Site we would note that the comments made also relate to the delivery of the wider strategic policies of the Publication Draft Local Plan by association. In particular, it is maintained that the Council's failure to optimise the development potential of appropriate sites place undue and unnecessary pressure on other parts of the Borough / other Boroughs within Greater London.

We set out our responses to the relevant elements of the Publication Draft Local Plan and associated evidence base below. These have considered the emerging Local Plan in the context of the requirements established by the National Planning Policy Framework (July 2021) and London Plan 2021 (March 2021).

The representations are also made in the context of pre-application discussions between our client and the LPA during 2019 to 2022 in respect of an emerging development scheme for the Site.

## **Part Two: Managing Development**

### ***QD4 Building Heights***

Policy QD4 states that ‘tall buildings’<sup>1</sup> will only be considered acceptable in-principle in the locations identified at Figure 5.1 as being appropriate for tall buildings.

Whilst our client acknowledge the requirement to adopt a strategy for the delivery of tall buildings within the Borough the policy as currently drafted is considered to be overly restrictive and greater flexibility should be introduced to ensure the delivery of residential units can be optimised. This is particularly relevant for sites which are proposed to be allocated for residential-led development and therefore expected to contribute to the housing supply.

The appropriateness of the final level of density can only be judged on a site by site basis. This will need to take into consideration a range of matters linked to accessibility, quality of accommodation and place, amenity and social infrastructure.

The strategic designation for the Site on Bromley Road is for growth and intensification. In order to increase the development capacity on brownfield land and to ensure development viability at strategic sites, the policy should not look to unduly restrict building heights. The restriction on tall buildings outside of those locations identified as ‘Suitability Zones’ on the Policies Map without would undermine the opportunity to increase development capacity, which in turn affects the regeneration opportunity.

Our client requests that additional wording is added to Policy QD4 to take account of the scope to consider higher densities at those site allocations located outside of Tall Building Suitability Zones and confirm support for redevelopment of these where the criteria outlined at part D of the policy are demonstrated.

This will ensure that the policy is sufficiently flexible to ensure that the strategic objectives and allocations to secure the Council’s development needs are deliverable.

### ***HO1 Meeting Lewisham’s housing needs***

The NPPF requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

Local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.

They should be consistent with the principles and policies of the NPPF, and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions.

Planning policies should amongst other things be ‘*flexible enough to accommodate needs not anticipated in the plan...to enable a rapid response to changes in economic circumstances*’<sup>3</sup>. Paragraph 120 states that planning policies should encourage multiple benefits from urban land.

At the heart of the above is a presumption in favour of sustainable development which for plan-making means positively seeking opportunities to meet development needs of an area, and be sufficiently flexible to adapt to rapid change.

As the new Lewisham Local Plan emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development in sustainable locations across the Borough.

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<sup>1</sup> Defined to be buildings of 10 storeys or 32.8 meters measured from the ground level to the top of the building

Policy HO1 of the Regulation 19 Draft Local Plan confirms that the Borough will seek to meet the London Plan set target of 16,670 net housing completions over a ten-year period from 2019/20 to 2028/29 for Lewisham.

However, as this does not identify the housing need for the Borough beyond 2029, the Council has considered it appropriate to 'roll-forward' the Borough's London Plan annual housing target to produce a 15-year target of 27,730 net housing completions. It is noted that such targets are not a ceiling and are encouraged to be exceeded.

Table 13.1 of the Regulation 19 Draft Local Plan states that site specific allocations have been identified with the potential capacity to deliver a minimum of 24,413 net new homes over the plan period. The Council has sought to supplement this with large consented sites and the trend-based windfall delivery rates in the Borough to demonstrate sufficient capacity to exceed the 10 year London Plan target and the NPPF housing target over a five and 15-year period.

We consider this approach to be unsound on the basis that this fails to adequately consider the Boroughs most recent trends in housing delivery which is substantially below London Plan targets. Critically, it is noted that the Lewisham Authority Monitoring Report 2021-22 (December 2022) identifies that the Council only achieve 88% of its housing target for 2021 and 87% for 2022. This has resulted in a requirement to produce an 'Action Plan' to address past under-delivery alongside the introduction of a 20% buffer for the purposes of calculating supply.

The December 2022 Monitoring Report recognises that it will become increasingly challenging to meet the Housing Delivery Test in future years given the low level of completions in the last two years, and it is probable that Lewisham will need to start planning for a 20% buffer in the near future.

For these reasons it is fundamental that the Council seeks to boost the future housing land supply through ensuring that all site allocations have been fully optimised. This will ensure that there is a sufficient buffer within the Borough's housing supply to account for any sites that are not delivered as currently intended.

It follows that the redevelopment of site allocations will be critical to the realisation of the Council's ability to meet its required housing targets for the Borough. This is an important consideration in respect of the context for determining the appropriateness of any limitations proposed by individual allocations.

### **Part Three: Lewisham's Neighbourhoods and Places**

#### ***Lewisham's South Area Site Allocation 10 Homebase / Argos, Bromley Road***

The Site is currently proposed as an allocation for comprehensive residential-led mixed use redevelopment within Lewisham's South Area under Reference: '*10 Homebase / Argos, Bromley Road*'.

It is stated that the allocation has an indicative development capacity of 141 net residential units and 5,694 sq. m of gross non-residential floorspace.

The proposed allocation sets out that the intensification of the Site, along with the introduction of a wider range of uses, will provide a more optimal use of land. Furthermore, any proposals for redevelopment of the Site would need to accord with a series of requirements and guidelines linked to delivery of new and improved public realm, green infrastructure and positive frontages.

Our client supports the principle of the emerging allocation of the Site for comprehensive redevelopment which can help to meet strategic objectives in terms of residential land supply, economic growth and employment generation within Catford in the mid to long term.

However, it is noted that the ability to secure such objectives will only be realised if a viable development scheme can be delivered at the Site. As currently drafted, the Regulation 19 Draft Local Plan would impose onerous limitations on the allocation of the Site which our client seeks to address further below.

## Residential Yield

As set out above, the site allocation at Homebase / Argos, Bromley Road on Bromley Road is identified to deliver an indicative development capacity of 141 net residential units.

Whilst our client acknowledges the stated capacity is quoted for indicative purposes it is still felt that this should be increased such that it more accurately reflects the potential of the Site rather than suggest an applied limit which would only serve to stifle development.

The initial design concepts presented during pre-application discussions with the Council have demonstrated that the capacity of the Site significantly exceeds that which is currently identified by the emerging allocation.

Critically, given the high existing use value of the existing use, any residential led scheme will need to exceed the indicative capacity which is set by the allocation to realise the objective of comprehensive redevelopment of the Site.

A lower density scheme in line with the indicative capacity would mean that the opportunities offered by the site cannot be realised during the Plan period. The effect of this would be to:

1. Reduce the housing supply generated by Site Allocations by 141 units which increases the demand placed on other, less suitable sites; and
2. Lose wider benefits linked to comprehensive redevelopment including the delivery of more appropriate, in terms of configuration and mix, commercial space and improved layout and public realm.

On the basis that the Site has been specifically identified as suitable for residential uses, and the quantum of development required to facilitate a viable scheme would be significant, the indicative capacity should be increased to circa 300-350 units.

This would be more consistent with the Plan's strategic focus of delivering housing land supply on previously developed and brownfield sites, the optimisation of housing delivery and a 'design led' approach set by the London Plan.

The proposed intensification of the Site in this manner would help to meet the Borough's need for additional residential units in a preferred and sustainable location.

It would also ensure that the delivery of a residential led development at the Site can make a significant contribution towards public amenity and accessibility (re-establishing connections with existing green spaces) as envisaged by the allocation.

Given that site allocations are the key strategic reservoir for new homes within the Borough the deliverability of these will be critical in order for the Council to meet their housing targets. For policy to rely on a crude calculation that does not reflect proper consideration of the spatial characteristics or deliverability of individual sites is not in our view a sound approach.

Specifically, we would question the logic of placing onerous restrictions on the capacity of allocations without undertaking more site specific analysis as part of the evidence base or detailed design development through the planning process.

It follows that, as drafted, the emerging allocation at Homebase / Argos, Bromley Road on Bromley Road fails to recognise the opportunity and true capacity of the Site and in that regard is unsound.

We would request that the indicative development capacity for the allocation is increased to circa **300 – 350 net residential units** to ensure that this is consistent with national policy and justified.

## Commercial Land Uses

As set out above, the site allocation at Homebase / Argos on Bromley Road is identified to deliver an indicative development capacity of 5,694 sq.m of gross non-residential floorspace.

Whilst the proposed inclusion of compatible main town centre uses is supported in principle it is considered that greater flexibility should be afforded to deliver these without reference to such a prescriptive capacity figure. Specifically, a lower quantum of non-residential floorspace can still contribute towards the aspirations for the A21 Corridor in terms of creating positive frontages along Bromley Road and Beckenham Hill.

This could include the provision of retail uses which would help to meet shopping requirements locally and contribute to creating a sustainable, mixed use development by meeting the needs of a new residential community at the Site. This would also reflect the existing and established land uses at the Site and enable sufficient flexibility for the delivery of an appropriate mix and quantum of land uses.

It is noted that the established retail use at the Site is not protected and the redevelopment of the floorspace for alternative land uses is therefore acceptable in principle. Additionally, the Site is located over 300m from a primary shopping area or town centre boundary and would be identified to be 'out-of-centre' site for the purposes of assessing proposals for main town centre uses. It follows that the identification of such a significant quantum of non-residential floorspace does not accord with the objectives of the NPPF or London Plan.

Furthermore, the initial design concepts presented during pre-application discussions with the Council have demonstrated that a residential led, mixed use scheme would not support such a substantial quantum of non-residential space as that currently identified (5,694 sq. m).

Our client would therefore request that the allocation be revised to remove an indicative capacity figure for gross non-residential floorspace in favour of referring to the fact that the delivery of main town centre uses is supported as part of a residential led redevelopment scheme.

This would ensure that the allocation relates to a viable scheme which can be realised and accords with the strategic policies of the Regulation 19 Draft Local Plan which seek to adopt a 'town centre first' approach for the introduction of main town centre uses.

In summary, the identification of an indicative development capacity of 5,694 sq. m for main town centre uses is not supported by market conditions, emerging policy or the Council's own evidence base. It follows that explicit reference to a specific quantum should be removed from the allocation in order to ensure that this sound and based on the supporting evidence base for the emerging local plan.

## **Summary and Conclusion**

In summary, our client strongly supports the overall principles of redevelopment and regeneration as set out within the emerging Local Plan. It also reiterates its **support** for the allocation of the Homebase / Argos site on Bromley Road and is fully aligned with the Council's aspiration to deliver comprehensive redevelopment here.

However, it is requested that the Council afford proper consideration to the commercial realities that are integral to the realisation of this allocation. Specifically, for this to be realised, it will be necessary to adopt a more flexible approach in terms of capacity, densities and land uses.

As drafted, the current allocation does not optimise the site to deliver the maximum number of homes and retains an inflated quantum of non-residential floorspace which is not supported by strategic policies of the emerging Local Plan or the Council's evidence base.

This is in direct conflict with the aspirations of the London Plan and the overarching strategic objective to secure sustainable development and make most effective use of land as set out in the NPPF.

It follows that the Regulation 19 Draft Local Plan, and particularly in regard to the allocation at Homebase / Argos on Bromley Road, does not meet the tests of soundness identified at Paragraph 35 of the NPPF. Specifically, it is not justified or effective and is inconsistent with the provisions of national policy.

We trust that these formal representations will be afforded the appropriate weight by the LPA and assist in the formulation of the emerging Local Plan. We would also be grateful if you could acknowledge receipt of these representations and keep us updated of any further stages of consultation, so that we can provide comments as may be required.

Should you require any clarification or additional information, please do not hesitate to contact Chris Moore or Tim Price at these offices.

Yours faithfully

A handwritten signature in cursive script, appearing to read "Savills", written in black ink.

**Savills (UK) Limited**



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**From:** Badgery, Lewis <Lewis.Badgery@vwfs.co.uk>  
**Sent:** 20 February 2023 17:16  
**To:** LocalPlan  
**Subject:** Title Number(s) - Lewisham Local Plan: Proposed Submission Document consultation  
**Attachments:** Lewisham Local Plan - Proposed Submission Document consultation.pdf

Dear Sirs,

Thank you for your correspondence **Re: Lewisham Local Plan: Proposed Submission Document consultation**, a copy of which is attached.

It is noted that you believe we may hold an interest as a leaseholder for part or all the land that falls within, or in proximity to, a site which you are proposing for future redevelopment. In order for us to confirm if we still have leaseholder interest in this site please can you provide the title number(s) held by the Land Registry for the plot(s) concerned.

Furthermore, it is acknowledged that your letter was addressed to Volkswagen Group (UK) Limited (“VWG”). As a courtesy, a copy of this letter will be forwarded to our VWG colleagues in order for them to confirm whether the interest is, in fact, theirs.

I look forward to hearing from you.

Yours faithfully,  
Lewis

**Lewis Badgery**  
Legal Undergraduate  
Executive – Legal and Compliance  
**VOLKSWAGEN FINANCIAL SERVICES (UK) LIMITED**  
E-mail: [Lewis.Badgery@vwfs.co.uk](mailto:Lewis.Badgery@vwfs.co.uk)

**THE CONTENT AND ATTACHMENTS IN THIS EMAIL MAY BE LEGALLY PRIVILEGED, CONFIDENTIAL AND/OR FOR INTERNAL USE ONLY – PLEASE ASK BEFORE CIRCULATING EXTERNALLY.**

Upcoming absence: 2<sup>nd</sup> March 2023 / 6<sup>th</sup> March 2023 – 10<sup>th</sup> March 2023 inclusive

Local Plan  
Lewisham Planning Policy  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
London SE6 4RU

25 April 2023

Sent via email: [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

## **LEWISHAM LOCAL PLAN – REGULATION 19 STAGE “PROPOSED SUBMISSION DOCUMENT” (JANUARY 2023)**

Dear Sir / Madam

### **1. About L&Q**

L&Q is a regulated charitable housing association and one of the UK’s most successful independent social businesses. The L&Q Group houses around 250,000 people in more than 105,000 homes, primarily across London and the South-East. As a not-for-profit organisation, L&Q reinvest all the money we make into new and existing homes, creating successful communities, and providing excellent services.

### **2. L&Q in Lewisham**

L&Q is a major provider of homes in Lewisham, currently managing over 8,835 homes across the Borough. We see great potential in Lewisham and currently have new homes under construction at the Excalibur Estate and Timberyard.

### **3. Tests of soundness**

L&Q welcome the opportunity to provide representations to the Proposed Submission Document of the Lewisham Local Plan (Regulation 19 – publication stage). This follows our submission of representations to the Regulation 18 stage document of the Local Plan on 9 April 2021.

At Regulation 19 stage, submissions are required to focus on whether the proposals meet the tests of soundness as set out Paragraph 35 of the National Planning Policy Framework

– a) positively prepared; b) justified; c) effective; d) consistent with national policy. We have set out below, whether we consider the Local Plan to be sound or not, and changes required to make it sound.

#### 4. Overview of representations

Our representations focus on the Site Allocation 13: Excalibur Estate. In our Regulations 18 stage representations to the Local Plan, we highlighted the detail regarding each phase was incorrect and should be updated.

We have reviewed the updated Site Allocation for the Excalibur Estate. There remain errors which need to be corrected, and text which we don't consider appropriate to be included in the allocation. We have summarised this below:

- **Indicative development capacity** – The current S106 for the Site permits 365 units to be built across the whole development, rather than 362 units identified in the Site Allocation. This should be corrected.
- **Listed buildings** – Whilst the Site Allocation has been updated to reflect the Listed Buildings on Site, the location of these buildings is currently described incorrectly. There are two rows of Listed bungalows, one of two bungalows and one of four bungalows, rather than a single row with six bungalows. This should be corrected.
- **Opportunities** - We note that exact unit numbers have been included in the Opportunities section of the allocation in the Regulation 19 version of the Local Plan. We consider this change to be too prescriptive and unnecessary given the indicative development capacity has already been set out in the main table. We recommend this additional wording is removed.
- **Development guidelines** – The Site Allocation has been updated with additional wording, following consultation comments received from Thames Water.

L&Q will always work in partnership with Thames Water regarding the management of surface water and diversion of existing sewers where applicable. However, we don't consider it appropriate for references to the Evelyn Street trunk sewers to be included in the Site Allocation, especially since it is not referenced in the consultation response from Thames Water itself. If the wording is retained, we recommend the text is updated as follows:

*“Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. New connections into the Evelyn Street trunk sewers will not be allowed. **Thames Water will work proactively with the landowner to provide alternative sewer locations to ensure the development can come forward in line with the Site Allocation**”.*

Currently, as written, L&Q consider the Site Allocation for Excalibur Estate to be **not sound** on the basis that is '*Not Effective*'. However, the changes suggested above will enable the site allocation to be effective and sound in plan making terms.

### **Further participation**

In summary, we are supportive of LB Lewisham updating its Local Plan to guide development between 2020-2040. These amendments to the Draft Local Plan, including the Excalibur Estate Site Allocation, will ensure the plan is effective and sound in plan making terms.

We look forward to confirmation of receipt of these representations and request the right to be heard by the appointed examiner at the Examination in Public if we choose to participate further.

Yours sincerely

**Jade Wong**

Design and Planning Manager

DDI: 0300 456 9998 x3307

Email: [jwong@lqgroup.org.uk](mailto:jwong@lqgroup.org.uk)

NHS Property Services Ltd  
10 South Colonnade, Canary Wharf,  
E14 4PU

Tel: 07775295338  
Email: [rowan.gilbert@property.nhs.uk](mailto:rowan.gilbert@property.nhs.uk)  
[www.property.nhs.uk](http://www.property.nhs.uk)  
(24<sup>th</sup> April 2023)

Dear Planning Policy Team,

### **Lewisham Local Plan Proposed Submission Version**

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS). These comments should be read alongside NHSPS's previous responses to the Local Plan at the Main Issues stage (2015) and the Main Issues and Preferred Approaches stage (2021) and the SHLAA Call for Sites consultations in 2017 and 2018.

#### **Foreword**

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

#### **Overview**

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Our comments on the policies set out within the Local Plan are as follows.

**Policy flexibility (enabling the NHS to be able to promptly evolve its estate)**

**Introduction**

Policy C11 Safeguarding and Securing Community Infrastructure states that development proposals will be permitted where *“the development is directly associated with a public service transformation programme necessary to enable or sustain the delivery of service improvements and related investment in community infrastructure.”*

NHSPS support this policy wording, subject to confirmation that this would include any relevant NHS Estate Strategy, where any restrictions or requirements for periods of marketing could prevent or delay investment in new/improved health infrastructure.

**Policy (site allocation)**

Site allocation Lewisham’s West Area allocation 3 Jenner Health Centre allocates the site for redevelopment to provide 30 residential units and 2,081 sqm main town centre/community uses. The development requirements attached to this application specifically require the re-provision of the existing health care facility, in line with Policy C11.

Although we support the in-principle allocation of this sites, we request some amendments to the wording and policy requirements to ensure the site can be brought forward in a timely manner.

**Context**

It is noted that Lewisham’s Western Area Site Allocation 3 covers the Jenner Health Centre. An extract of the site allocation showing the area proposed as part of the Local Plan Site Allocation is set out below:



NHSPS own the freehold to Jenner Health Centre, and have previously promoted the site through the SHLAA Call for Sites consultations in 2018 and 2018 and Local Plan Main Issues and Preferred Approaches stage (2021) for a mixed-use residential and/or healthcare redevelopment.

Although we support the in-principle allocation of the redevelopment of the site, we wish to provide further detail on the site's capacity and recommend alternative wording based on this information.

Local health commissioners are currently developing a strategy for the future delivery of health services in this area. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs. This could include opportunities to make more efficient use of sites, providing health services from modern fit for purpose accommodation, alongside the release of 'surplus' parts of the site for development.

The requirements for health commissioning and the form of any health provision are a decision for local health commissioners and should not be tied down through planning policy, which can quickly become out of date. The NHS needs to retain the flexibility to implement its health commissioning strategy to meet the needs of the population at any time. The site allocation includes an indicative development capacity which is not proportionate with the expected NHS transformation plan for the area, and should therefore be amended.

NHSPS promoted the Jenner Health Centre site to the 2017 and 2018 SHLAA Call for Sites consultations, for redevelopment to provide residential uses and/or healthcare provision. The site was taken forward as an emerging site allocation within the Local Plan Main Issues and Preferred Approaches version in 2021, with an indicative capacity of 40 residential dwellings and 1,373sqm town centre uses. NHSPS responded to this consultation supporting the allocation in principle. Then in 2021, NHSPS undertook positive pre-application discussions with the Council for a redevelopment scheme to provide up to 50 dwellings and 1,650sqm healthcare provision. The officers requested some amendments to the design of the scheme, but supported the principle of the development and made no comments regarding the quantum of development.

With this context in mind, it is unclear why the indicative development capacity has been substantially amended within the Local Plan Proposed Submission document.

Emerging Policy QD6 states that "*where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard too (A) and (B) above.*" Point A specifies that development proposals must use the design-led approach to optimise a site's capacity, and point B states that the optimum capacity must take into consideration the appropriate development density. Whilst the site allocation sets only an *indicative* capacity, Policy QD6 requires this specific capacity to be met, meaning the indicative capacity takes the form of a development requirement. Therefore, it is essential that this indicative capacity allows development on the site to come forward, and enables the NHS to deliver its health commissioning strategy.

Emerging Policy CI1 recognises the need for public services including the NHS to transform their services and estates in order to sustain or enable the delivery of service improvements. The Jenner Health Centre site allocation includes a development requirement for the "*appropriate re-provision of the existing health care facility, in line with Policy CI1.*" NHSPS support emerging Policy CI1 and reference to this policy within the site allocation. However, through setting a required indicative capacity for health re-provision, this allocation restricts the ability of the NHS to deliver its public service transformation plan, and is therefore in conflict with policy CI1.

As discussed above, NHSPS works with NHS commissioners to ensure that the necessary services are provided in the best possible locations. NHSPS appreciate the Council's intent to secure health provision for local residents. However, by confining the form of this provision, the

allocation removes the flexibility needed by the NHS to implement its strategy and meet the needs of the community.

To confirm, sites (or sections of a site) can only be released for redevelopment or alternative uses once NHS commissioners have confirmed that it is no longer required for the delivery of NHS services. Additionally, all capital receipts raised from the disposal of sites are invested back into the NHS, enable further improvements to local health infrastructure.

Considering the above, NHSPS suggest the Jenner Health Centre Site Allocation 3 be amended to enable the NHS to reflect the site’s capacity as demonstrated through our previous pre-application discussions. This amendment also brings the site allocation in line with emerging Policy CI1, and enables the NHS to deliver its public service transformation programme and improve local health services.

**Image of site allocation**

**Amended Wording**

The following amended wording (in blue) is recommended:

INDICATIVE DEVELOPMENT CAPACITY:	Net residential units <del>30</del> 50	Gross non-residential floorspace Employment 0 Main town centre uses <del>2,084</del> in line with local health commissioners estate strategy
----------------------------------	---	--

**Policy (health considerations in policy/design)**

Policies QD1, QD2, QD3, and QD8 provides requirements and guidance to ensure that the design of homes and public spaces is healthy and inclusive. NHSPS supports these policies.

**Context**

There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure, enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

The NPPF is clear in stating that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” (Paragraph 92).

Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities.

**Summary**

NHSPS thank Lewisham Council for the opportunity to comment on the Proposed Submission Local Plan and hope the proposed amendments are considered constructive and helpful. We look forward to reviewing future iterations of the plan and receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don’t hesitate to contact me.

Yours sincerely,  
Rowan Gilbert – Senior Town Planner MRTPI

NHS Property Services  
10 South Colonnade, Canary Wharf, E14 4PU



Planning Service  
Laurence House  
1 Catford Rd  
London  
SE6 4RU

Delivered via email only to: [localplan@lewisham.gov.uk](mailto:localplan@lewisham.gov.uk)

25<sup>th</sup> April 2023

Dear Planning Service

## RE: Local Plan Regulation 19 Consultation

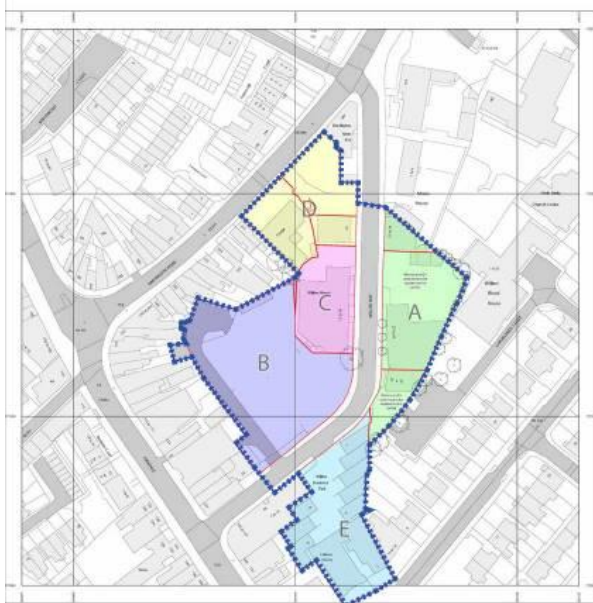
Kitewood Estates Limited ('Kitewood') write to provide our comments relating to:

- *Lewisham Local Plan: Proposed Submission Document January 2023*; and
- *Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022*

Kitewood is a privately owned development company, and we specialise in delivering high quality developments in London and the South East of England.

We control land adjacent to Willow Way, Sydenham and our comments predominantly relate to this site and the wider proposed allocation and masterplan area, edged by a broken blue line on **Fig 1.1** below.

**Fig 1.1 Location of proposed LSIS (Emerging Site Allocation No. 9)**



7 Dacre Street, London, SW1H 0DJ  
t 020 7929 5911  
[WWW.KITEWOOD.CO.UK](http://WWW.KITEWOOD.CO.UK)

The land adjacent to Willow Way is proposed to be allocated as a Locally Significant Industrial Site (LSIS) for an employment-led mixed-use development in the emerging Local Plan.

The area that is proposed for allocation comprises multiple ownerships / land control. For reference purposes, the sites are distinguished by referring to; **Site A**; **Site B**; **Site C**; **Site D**; and **Site E** on Fig 1.1.

Emerging Willow Way LSIS	Ownership/ land control
Site A	Kitewood Estates Limited
Site B	LB Lewisham
Site C	Kitewood Estates Limited
Site D	Private Individual
Site E	Private Individual(s)

Kitewood submitted a full planning application to the Council in December 2022 (application Ref: DC/22/129789) relating to Site A (21-57 Willow Way) for 1,401sqm flexible employment floorspace and 60 homes (including 50% Affordable Homes) in the context of an emerging masterplan. This planning application was refused by the Council on 23 March 2023.

Whilst we have not been directly approached by the Council to provide comment on the proposed emerging allocation LSIS at Willow Way, we have significant experience in delivering sites of this nature and we welcome the opportunity to comment on the emerging Local Plan (Regulation 19) to ensure the emerging site-specific policy “...is aspirational but deliverable” as set out in Para 16 of the NPPF.

We understand that this Submission Draft Local Plan consultation requires representations to specifically focus on the following issues:

- **Is the plan legally compliant?** - Does the Plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?
- **Does the plan comply with the ‘Duty to Cooperate’?** - Has the local planning authority engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the Plan?
- **Is the plan ‘sound’?** - Has the Plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

#### Lewisham Local Plan: Proposed Submission Document January 2023

This letter will focus on matters relating to **soundness**.

Para 35 of the NPPF States that Plans are ‘Sound’ if they meet the following tests of soundness:

*“a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

7 Dacre Street, London, SW1H 0DJ  
t 020 7929 5911  
[WWW.KITEWOOD.CO.UK](http://WWW.KITEWOOD.CO.UK)

c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

Kitewood’s comments relate to principally to the following matters; Justified and Effective.

## **Justified**

### **Principle of Development for LSIS**

**Kitewood consider that the proposed allocation of Willow Way as an LSIS is unjustified.**

The redevelopment opportunity at Willow Way to make the best use of Previously Developed Land (PDL) to deliver a viable mixed use scheme exists.

However, the sites adjacent to Willow Way that make up the emerging allocation area are predominantly in employment uses in accordance with the adopted Local Employment Location (LEL); the sites are not predominantly Industrial. The predominant surrounding uses are residential and the employment sites themselves were previously occupied by residential dwellings.

**Kitewood consider that the Policy for Willow Way should seek an employment led mixed use development, not an LSIS mixed-use development.**

The Local Plan evidence base, namely, the Employment Land Study 2019 (ELS) supports this.

Willow Way (stated as 1.2ha) Local Employment Location (LEL) is identified as cluster No.C20 in the ELS. It sets out that the primary type of employment is mixed B uses and the **recommendation is for employment-led mixed-use redevelopment (through a masterplan process)** (*our emphasis added*). The text relating to the site at para 5.52 and para 5.53 of the document is set out as follows:

*“5.52 Willow Way (C20) – is an industrial area in Forest Hill with a mix of B class occupiers. Commercial units are located on either side of Willow Way which runs between Kirkdale and Dartmouth Road. The site benefits from being in close proximity to amenities; located less than 100m from the majority of the site. The site has been developed in a number of phases on a piecemeal basis. There are modern small industrial units in close proximity to Kirkdale Road which are in reasonable condition and appear to be well occupied. Further south west along Willow Way the office and small industrial units are more dated but still well occupied.*

*5.53 There is vacant land in the centre of the site that was previously occupied by the council. The land is still in the council’s ownership and a masterplanning exercise was undertaken in 2013/14 which produced plans to provide residential units along with a school, commercial, and mixed-use space. These should be considered positively, if they do not reduce employment floorspace, but intensify the existing offering. Currently, there is no planning application for this land but if these plans go ahead it may encourage intensification of other parts of the site. Though there may be scope to provide a mix of uses on the site. The existing amount of employment floorspace should be protected to ensure that demand in the area is met over the plan period.*

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Furthermore, in terms of 'Layout, parking, servicing, landscaping etc.' the site scores 'Reasonable'; "Reasonable amount of yard space at Willow Business Centre given the type of units. The industrial units at the centre of the site have varying amounts of parking space and as a result, there are significant numbers of cars parked along Willow Way. Willow Way is not suitable for large HGVs, but this does not appear to be an issue for most current occupiers. There is no landscaping on the site."

Table A2.1 at page 132 of the ELS indicates the Employment Profile of the site generates 80 Jobs (66 jobs per ha). Of the 80 jobs, they are broken down in the ELS as follows: **14% industrial; 72% office; 0% Public; and 15% Customer.**

The ELS, sets out very clearly that only 14% of the existing jobs are industrial. The ELS does not specify if these uses are light or heavy industrial uses, however Kitewood consider them to be light industrial uses.

Kitewood consider that industrial uses in this location are not appropriate, nor in demand in this location and this is reflected by the existing composition of employment uses and along Willow Way and in the surrounding area, as outlined in the ELS above.

The ELS recognises that the site is sustainability located and benefits from being in close proximity to local amenities. The benefits of the sustainable location and low visibility of the site from the surrounding street makes Willow Way a key opportunity site for a comprehensive mixed-use redevelopment comprising:

- a) **Improved employment (use Class E) floorspace on the ground floor level:** *The provision of flexible and creative commercial floorspace proposed is considered to be appropriate to generate quality employment opportunities and higher job yield; and is important in the context of providing active ground floor uses to animate the public realm.*
- b) **Delivery of homes to meet growing needs:** *the provision of a full range and mix of quality housing is considered to be appropriate in this predominantly residential location.*
- c) **Placemaking and enhanced public realm:** *improving walking and cycling routes to public transport services and local facilities, a high quality and accessible public realm, landscaping (note there is no existing landscaping), biodiversity, the provision of amenity and public open space, and children's play areas, and high quality architecture and design that will contribute to raising the architectural quality of the area.*

## **Quantum of Development**

**Kitewood are not aware of any massing studies that have been undertaken to inform the emerging allocation and specifically, the proposed quantum of employment and residential floor areas.**

However, as it has been recognised, the emerging allocation site is hidden from the surrounding roads and the site topography would allow for an intensified proposal with greater height and mass than the existing development without creating any detrimental visual impact on the surrounding streets.

Notwithstanding the fact that industrial uses are not considered appropriate in this location, Kitewood are not aware of any evidence that has been published that sets out how the quantum of employment of floorspace could be accommodated. Kitewood consider that the types of uses would likely only be considered appropriate and deliverable at ground floor level with ancillary mezzanine space above. Therefore, the potential maximum quantum of employment floorspace would be limited to the extent of the developable ground floor area with ancillary mezzanine space above.

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Kitewood has tested the scenario where the emerging allocation area is built out in accordance with a masterplan approach, and specifically where the employment floorspace is situated at ground floor level, with limited ancillary mezzanine above. We consider that this form of development would deliver more than the existing level of employment floorspace, whilst also meeting the allocation target of 6,705sqm. This includes retaining the existing quantum of floorspace on Site E. This approach therefore complies with London Plan Policy E2.

**Kitewood therefore do not consider that the quantum of development as set out in the emerging allocation is justified, specifically in relation to the employment areas that would reasonably be expected at ground floor only, unless the Council can demonstrate that it has considered an outline massing and layout study of the emerging allocation area, or the existing levels of employment floorspace could contribute towards meeting the allocation aspirations.**

### **Effective**

### **Emerging boundary for LSIS and Masterplan Area and Deliverability**

Kitewood support the mixed-use allocation that seeks the delivery of an employment-led development (6,705sqm) that would be co-located with 175 new homes, but it is not clear as to how the Council arrived at the proposed allocation boundary.

Through an assessment of the opportunities and constraints, Sites A, B and C have the greatest potential to deliver the policy aspirations; It appears that Site D can accommodate a modest uplift of development; and Site E is already maximised and has limited potential to accommodate further development as part of a masterplan redevelopment.

**Kitewood therefore do not consider that the emerging policy boundary is effective, and it should be revised to exclude sites D and E from the emerging masterplan area unless the Council can demonstrate that it has liaised with the landowners of these respective sites and know they are available for redevelopment within the plan period, and therefore deliver the deliver the aspirations of the policy to maximise employment provision together with residential.**

**Furthermore, Kitewood consider that Sites A, B and C can be delivered within 1-5 Years, not 6-10 years as set out in the consultation document. This should be updated in the Plan to ensure that delivery is not unduly delayed.**

Should the boundary of the emerging allocation remain unchanged, it is considered that the Emerging Willow Way LSIS can come forward in phases that could be delivered individually or simultaneously without prejudice to the other sites coming forward for development.

<b>Development Phase</b>	<b>Site</b>
<b>Phase 1</b>	<b>Site A</b>
<b>Phase 2</b>	<b>Site B and Site C</b>
<b>Phase 3</b>	<b>Site D [and Site E]</b>

Site A is physically separated from Sites B and C by Willow Way, and it therefore considered to be well located to deliver the first phase of development.

The proposals for Site A seek to maximise the employment floorspace on the ground floor levels as would reasonably be expected in this location, whilst delivering homes above. Sites B and C also have the potential to maximise the employment floorspace on the ground floor and homes above along with potential to improve the public realm.

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## **Quality of Employment Floorspace**

Kitewood consider the quality of the existing employment floorspace across the emerging allocation areas, except for Site E, to be sub-optimal. This is reflected in the increased rate of vacancies within some of the units, as well as the quality of the existing buildings and floorspace.

Policy EC2 of the emerging Local Plan (Protecting employment land and delivering new workspace) supports the delivery of new and enhanced workspace. Kitewood consider that an appropriate employment-led mixed use development would create an ideal opportunity to deliver much improved, upgraded and more efficient workspace, in line with Policy EC2.

## **Growth Node and Growth Corridor**

The Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022 identify the emerging allocation area within a 'Growth Node' and adjacent to a 'Growth Corridor' that runs along Kirkdale to the west, and Dartmouth Road to the north.

Kitewood support the aspiration of the Growth Nodes and Growth Corridors as areas that are prioritised to deliver redevelopment of previously developed land to ensure green and open spaces are protected within the Borough.

Kitewood also recognise the role that Willow Way has in connecting the Growth Corridors along Kirkdale and Dartmouth Road and therefore consider the delivery of high-quality employment led redevelopment, with residential above is even more critical to meet the objectives of the Spatial Strategy.

Should you require any further information, please do not hesitate to contact myself or my colleague Sara Sweeney.

Yours faithfully,

**Will de Cani**  
Planning Manager

**KITEWOOD ESTATES LIMITED**

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Date: 28/03/2023  
Our Ref: 15206a

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Dear Sir or Madam

## **TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

### **RE: DRAFT LOCAL PLAN PROPOSED SUBMISSION REGULATION 19 CONSULTATION**

DWD has been instructed to submit representations on behalf of SG Smith Properties Limited ('SGS') to the Lewisham Draft Local Plan Proposed Submission Regulation 19 Consultation Document (January 2023).

The submission comprises of this letter which has been emailed to localplan@lewisham.gov.uk. Our representations focus on draft 'Site Allocation 12: 113-157 Sydenham Road' (Site Allocation 12).

Our client is the freehold owner of the following sites, which all form part of draft Site Allocation 12:

- 140-149 Mayow Road, London, SE26 4HZ
- 135 Sydenham Road, London SE26 5HB
- 137 Sydenham Road, London SE26 5HB
- 139- 151 Sydenham Road, London SE26 5HB

This letter sets out:

- Confirms SGS's ownership of land forming part of Site Allocation 12;
- Detail's SGS's support for the allocation and it's deliverability; and
- Proposed amendments to the draft Site Allocation 12 policy wording.

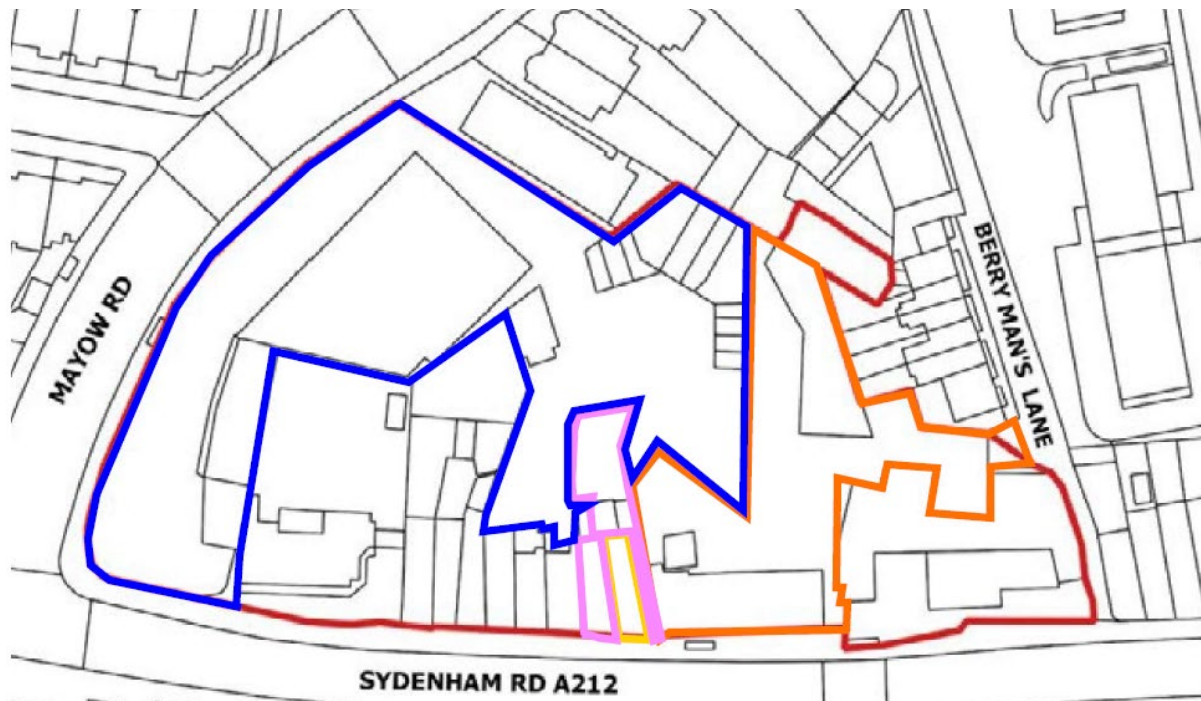
### **SGS Ownership**

Site Allocation 12 is titled as '113-157 Sydenham Road', however the land also encompasses 140-149 Mayow Road.

SGS own the majority of land within the proposed site allocation. Figure 1 below overlays the land area in our client's ownership over the Site Allocation 12 site plan. Our client owns 140-149 Mayow



Road (blue outline), 135 Sydenham Road (pink outline), 137 Sydenham Road (yellow outline) and 139-151 Sydenham Road (orange outline).



**Figure 1: Ownership Plan**

The remaining ownership plots outside of SGS’s ownership are: 121, 123, 123- 125, 129, 131 and 133 Sydenham Road, 153-161 Sydenham Road and a small parcel off of Berrymans Lane. These properties comprise of the Dolphin Public House, small retail units fronting Sydenham Road, an MOT repair centre/ car wash and an existing two storey building in residential use, forming part of the Crown Court development off of Berrymans Lane.

**Position on Allocation and Deliverability**

The land that forms part of Site Allocation 12 is already allocated within the adopted Local Plan under allocation SA22. SGS confirm that they are supportive of this allocation being carried through to the new Local Plan.

Regarding deliverability, our client currently leases the commercial and retail properties to four tenants. There are four leases currently in place and these leases expire between April 2025 and January 2032. The residential flats at the upper two floors of 139- 151 Sydenham Road are held on assured shorthold tenancies. Vacant possession of all of the land in our client’s ownership can therefore be secured.

The draft Local Plan proposes that this land is delivered in 11- 15 years. Given the end dates of the current leases, it is considered that the timeframes set out for delivery in the draft Local Plan are realistic and achievable. It is our client’s intention to promote development coming forward on their land.



### **Amendments to Site Allocation 12 Policy**

Whilst the principle of Site Allocation 12 is supported, we have set out below suggested amendments to the policy wording that are considered appropriate.

#### ***Site Area***

A small parcel of land off of Berrymans Lane is proposed to be included in the allocation. There is a two-storey building on this land, which is in residential use. It forms part of the Crown Court development, which comprises of two blocks and a total 10 flats and off-street parking. The appropriateness of including this parcel of land within the allocation as this forms part of an existing residential development is questioned.

#### ***Multiple Applications***

In the 'development guidelines' section of the policy, the wording should recognise that development is likely to come forward under a number of separate planning applications, given that there are multiple land owners.

It is acknowledged that each application that comes forward will need to consider the delivery of the wider allocated site and ensure development of part of the site does not compromise the delivery of the remaining land. However, it is considered necessary to support the land being delivered by more than one planning application, to ensure that when land becomes available for development it can be delivered without delay.

#### ***Dolphin Public House***

We consider that the draft policy wording relating to the Dolphin Public House should be reconsidered. SGS acknowledge that the public house is locally listed, however the policy wording needs to ensure an appropriate balance between protecting the locally listed pub and ensuring this does not unreasonably constrain development on the allocated site is needed.

The draft wording states that development needs to conserve and enhance 'attractive views of the west-facing gable end of the pub'. The design of the plot on the corner of Mayow Road and Sydenham Road, to the west of the pub, will need to be carefully considered. However, it needs to be ensured that the development potential of this key corner plot, which is likely to be a focal building within the allocated site due to its position, is not unreasonably constrained so as to prejudice the optimum development capacity of the allocated site being delivered.

Furthermore the policy advises that the pub-garden should be protected from any development. The relationship between this garden, and the new build development that will come forward needs to be considered, to ensure the development of the wider site is not prejudiced and that a balanced approach is taken to the protection the pub-garden.

It is considered that the policy wording should be amended to confirm that the relationship between the locally listed building and new build development will need to be considered on balance with the wider regeneration benefits of any scheme that comes forward for development of the allocated site.

### **Summary**

SGS is the majority landowner of Site Allocation 12 of the Draft Local Proposed Submission. They are supportive of the allocation of this land in the new Local Plan and consider the proposed delivery timeframes to be realistic.

SGS do however have concerns regarding the current draft policy wording. Specifically, there being a need to allow multiple applications to come forward, and there being a recognition of the need to balance impacts on the locally listed Dolphin Public House alongside the wider regeneration benefits of the redevelopment of the allocated site.

We would welcome the opportunity to further engage with the Council's Spatial Planning Team to input into the final drafting of Site Allocation 12, to ensure that the allocation is effective, deliverable and justified.

If you require any further information in connection with these representations and the proposals for the site, please do not hesitate to contact me.

Yours faithfully,



**James Smith**  
**Senior Planner**  
**DWD**

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**Date:** 25<sup>th</sup> April 2023  
**Your Ref:** 12723

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Dear Sir or Madam

## **LEWISHAM LOCAL PLAN: PROPOSED SUBMISSION (JANUARY 2023) – REGULATION 19 CONSULTATION**

### **REPRESENTATIONS ON BEHALF OF .BIG YELLOW SELF STORAGE COMPANY LIMITED**

These representations are submitted on behalf of our client, .Big Yellow Self Storage Company Limited ('Big Yellow') to Lewisham Council's consultation document 'Lewisham Local Plan: Proposed Submission Document' (January 2023) ('draft consultation document').

Big Yellow owns the freehold interest of the land at 155 Lewisham Way, New Cross, London SE14 6QP ("the Site") as shown on the appended map (Appendix A). These representations relate to the Site.

#### **Site and Surrounding Area**

The Site is located within the boundary of Lewisham Council and extends to an area of approximately 0.46 hectares, located on the north-eastern side of Lewisham Way. The Site is occupied by a Big Yellow self-storage facility which fronts Lewisham Way, and a smaller building set back from the main road which is occupied by several industrial / commercial uses. Both buildings are accessed from Alexandra Cottages and have associated service yards and parking area.

#### **Current Policy Position**

Within the adopted policies map the Site is located within the Lewisham Way Local Employment Location (LEL) which is one of 12 designated LELs within the Borough. In policy terms, LELs are protected for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and appropriate sui generis uses, to support the functioning of the local economy. This policy protects the Site for continued industrial use, including for self-storage purposes (Class B8).

#### **Bakerloo Line Extension**

On 1<sup>st</sup> March 2021 the Secretary of State for Transport gave safeguarding directions for the Bakerloo Line Extension (BLE). The Site is located within a safeguarded zone as a specific location for the 'Lewisham Way shaft worksite' and within the 'proposed tunnel corridor', more generally.

It is not known at this point whether all, some or none of the Site will be required for the BLE. Therefore, any area that is not used or, indeed, once it has been used and is no longer required for the BLE, could come forward for employment development in the plan period.

#### **Policy EC 2 (Protecting employment land and delivering new workspace)**

Big Yellow continues to **support** part A of this policy, which seeks to safeguard employment sites and floorspace for commercial, industrial, and related sui generis uses. Furthermore, Big Yellow now **supports** the amended wording to part B(d) of this draft policy, which states:

*“Outside of SIL, avoiding development that consists solely or predominantly of Class B8 storage or warehousing uses unless:*

- i. The site is currently solely or predominantly in storage and warehousing use; and*
- ii. Redevelopment proposals comprise of intensification of storage and warehousing uses and/or employment generating uses appropriate to the site;”*

The amended wording now provides flexibility for existing self-storage facilities outside of SIL to be redeveloped and/or intensified for storage and/or other employment generating if it is currently solely in storage use.

#### **Policy EC 6 (Locally Significant Industrial Sites)**

Big Yellow now **supports** the amended wording of Part C of this policy, which now states:

*“Within LSIS, development proposals for self-storage and large format storage and warehousing uses and facilities will only be permitted where:*

- a. The requirements of Policy EC2.B(d) (Protecting employment land and delivering new workspace) are satisfied; or*
- b. There is a demonstrable local need or market demand for the use proposed;*
- c. The use cannot be reasonably located in a SIL, as evidenced by a detailed site selection exercise; and*
- d. The development will include provision of a reasonable proportion of flexible workspace or units for micro, small or medium-sized businesses.”*

#### **Policy EC 7 (Non-Designated Employment Sites)**

Big Yellow continues to **support** part A of this policy, which seeks to protect and not result in the net loss of viable industrial capacity on non-designated employment sites.

Big Yellow also **supports** parts B and C of this policy on the understanding that they simply provide in principle support for employment-led, mixed-use development on these sites, and do not place a requirement for such proposals.

I trust that the information provided clearly sets out Big Yellow’s position regarding Lewisham’s new Local Plan. Please do not hesitate to contact me if any further clarification is required on the above.

I would be grateful if you could please confirm receipt of these representations and keep me informed of any further consultations moving forward.

Yours faithfully,



**Andrew Deller**

**Partner**

**DWD**

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**Representations submitted on the Regulation 19 version of  
the draft Lewisham Local Plan**

**Deptford Trading Estate, Deptford**

**Submitted on behalf of SEGRO PLC**

**April 2023**

# 1 Introduction & Site Context

- 1.1 This document includes representations to the Regulation 19 version of the draft Lewisham Local Plan (the Draft Plan) that was published for consultation on the 1<sup>st</sup> March 2023. These representations have been prepared on behalf of SEGRO PLC, who are the owners of an existing employment site at Blackhorse Road in Deptford, that makes up a significant part of the land referred to as the Deptford Trading Estate in the Draft Plan.
- 1.2 This document provides comments on several of the draft policies included in the Draft Plan with particular regard to their likely impact on bringing forward employment development within the Borough over next plan period. Both the National Planning Policy Framework (NPPF) and the London Plan provide significant support to development that supports economic growth so it is therefore important to ensure that constraints on such development are identified to ensure that sufficient employment premises are available to meet the needs of occupiers.
- 1.3 The land that is within the ownership of SEGRO PLC at the Deptford Trading Estate extends to circa 1.82 Hectares and includes a number of different unit type and sizes. The site is located on Blackhorse Road, with Evelyn Road to the east, which forms the main form of access to the site. For reference, the boundary of SEGRO's ownership is illustrated by Figure 1. The employment units at the site are in use to support a range of employment operations across Classes E (g), B2 and B8.
- 1.4 The estate was built in the 1980s so there are now opportunities for re-development to upgrade the building stock and provide more modern and energy efficient premises for continued employment use.
- 1.5 The site is currently allocated as a Strategic Industrial Location (SIL) in both the adopted Lewisham Local Plan and the London Plan known as Surrey Canal Road, which is one of two SIL allocations in the Borough.
- 1.6 SEGRO PLC intend to retain ownership of this site so that it will continue to provide for the needs of businesses and support the economic function of Lewisham and Greater London.



**Figure 1: Plan illustrating SEGRO PLC's ownership (outlined in red).**

## 2. Background to SEGRO plc

- 2.1 For over 100 years, SEGRO has been developing and managing warehouse and industrial space to support business growth. SEGRO's 1,400 customers range from global organisations to small businesses, and include household names such as Royal Mail, Brompton Bikes, Mars, John Lewis, Netflix, Rolls Royce, and Mitsubishi.
- 2.2 SEGRO warehouses provide the space that enable extraordinary things to happen, from pharmaceutical development to high value engineering, urban logistics to R&D, film production to food manufacturing, and data storage to e-commerce. These sectors are helping to create high value jobs for local people, drive innovation, and boost productivity by providing the goods and services that a modern society demands.
- 2.3 In Greater London, SEGRO owns and manages nearly 1.4 million sqm of industrial space which is home to 450 businesses of varying sizes. This includes Deptford Trading Estate and New Cross Business Centre, in the London Borough of Lewisham.
- 2.4 SEGRO occupiers at London industrial locations are varied and cover a number of different sectors that often support other uses and economic activity across the Capital and the UK. Some examples of the type and scale of businesses accommodated at SEGRO premises in the borough are set out below, which provides a snapshot of businesses that operate from employment locations:
  - Food distribution, including small and medium sized enterprises (SME's) serving some of the best restaurants in the capital as well as charities that seek to avoid food waste through redistributing surplus groceries to vulnerable people;
  - Supply and installation of domestic goods such as bespoke carpets and flooring, many of which are smaller family run businesses
  - Catering business for events in prestigious London venues as well as brewers who manufacture craft beers and other beverages,
  - Suppliers of theatre hardware and stage equipment
  - Online delivery operations and couriers
  - Suppliers and distribution to the automotive industry
  - Commercial laundry services serving hospitals, hotels and other operations

### 3 Comments on Draft Policies

- 3.1 This section details the policies that SEGRO PLC want to make representations on and whether they wish to offer their support or object to it. For clarity, the draft policy is set out first, followed by commentary about the policy. Finally, any proposed changes to the policy wording are identified, where this is considered necessary.
- 3.2 These representations are made in consideration of paragraphs 15 to 37 of the NPPF, with particular reference to the need for policies to be consistent with National and Regional policy, to contribute to the delivery of the Plan's objectives and be clearly written and unambiguous.

#### DESIGN

##### Draft Policy QD1 – Delivering high quality design in Lewisham

*J. Development proposals will be expected to have regard to and address:*

*b. Feedback from the Council including through its Pre-application Advice Service and where appropriate, Lewisham's independent Design Review Panel.*

- 3.3 Further information on the Design Review Panel is then set out in the following explanatory text, which states (para 5.7):

*Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Proposals for major developments and other developments likely to have significant local impacts should be brought to the panel at the early stage in the planning process*

##### **Position: Object**

- 3.3 Major applications for commercial development are those of 1,000 sq m or more, or where they are on sites of 1 ha or more. For employment development on sites that are designated as SIL, these represent very small developments. The principle of development is already established and the potential for likely impacts for development of this nature is considered to be small.
- 3.4 Therefore the need to present such proposals to the Design Review Panel is considered to be excessive, placing additional demands on applicants for smaller proposals and leading to extended application timescales. The terms of reference for the Borough's Design Review Panel state that proposals for important/significant major development should be subject to review by the Panel so the explanatory notes to the policy should reflect this.
- 3.5 The term 'important major' or significant major' development is open to interpretation an imprecise. Larger employment development that is referable to the GLA (i.e. on sites over 5 Ha or in excess of 15,000 sq m) are likely to have greater potential for local impacts. It is therefore considered that the explanatory notes should be amended to refer to referable major employment schemes, as this would be a defined threshold that would prevent ambiguity.



**Proposed amended wording of paragraph 5.7:**

*Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Proposals for major developments that are referable to the GLA and other developments likely to have significant local impacts should be brought to the panel at the early stage in the planning process.*

**Draft Policy QD3 – Public realm and connecting places**

*H. Development proposals, particularly for major development, should investigate opportunities to integrate public art to enhance the legibility of the public realm, enhance the distinctiveness of buildings and spaces, and to help to foster a sense of place. The use of local artists for public art commissions is strongly encouraged.*

**Position: Object**

3.6 This policy should be reworded so that the provision of public art is provided as a Section 106 obligation, where appropriate.

**Proposed wording:**

*H. For important major developments, public art to enhance the legibility of the public realm, enhance the distinctiveness of buildings and spaces, and to help to foster a sense of place. The use of local artists for public art commissions is strongly encouraged.*

**ECONOMY****Draft Policy EC3 - High quality employment areas and workspace**

A. *Development proposals must:*

*b. Make provision for an appropriate level of internal fit out beyond shell and core, including:*

- i. Connection-ready high speed broadband;*
- ii. Installation of mechanical and electrical services;*
- iii. Toilets and kitchenette;*
- iv. Internal surface finishing and blinds;*
- v. Basic fire and carbon monoxide detection; and*
- vi. Shopfronts and glazing, where appropriate.*

B. *Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) must include a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises (SMES).*

**Position: Object**

- 3.7 Part A (b) of draft policy EC3 is too specific, as details concerning the internal appearance and specification of internal fittings of new employment unit will only be selected by occupiers once approval is granted and often after development of the shell and core has completed. Any provision of such internal fittings and finishes could end up being redundant as it may not meet the occupier's requirements and be stripped out so that they can undertake their own fit out, which would be a waste of resources. The policy should therefore be reworded to at least remove clause iv.
- 3.8 In the adopted plan, SMEs are encouraged to locate in LEL locations, which are now discouraging larger scale development, and evidently defining the role and nature of both LELs and SILs. Under the new policy, the roles of areas of SIL, LSIS and MEL are less clearly defined leading to confusion about what type of employment operations is suitable on these sites. The purpose of areas of SIL is to provide areas that are not compromised in their ability to support the employment needs of businesses.
- 3.9 In the London Plan, the equivalent Policy E2 uses less restrictive language than draft policy EC3 stating that proposals should "*consider the scope*" to provide flexible workspace for micro businesses and SMEs. Requiring development of this scale to include small/micro units could compromise the ability of development to meet market demands and make the best use of land to support economic growth, which are all key requirements of the NPPF, the London Plan and the Draft Plan.
- 3.10 This policy is likely to affect the availability of smaller to medium sized employment units, as space will need to be given over to accommodate the policy requirement, thereby reducing the size of the other units within the development. SME's are often as likely to use units of c.3,000-4,000 sq m as larger businesses, but there is no strict rule about what size units different business types will use. The draft policy is therefore likely to compromise the ability of areas of SIL to deliver the type of development that they are designated to provide.
- 3.11 The wording of this draft policy should therefore be more flexible, so that it does not relate to SIL and only requires proposals to consider provision of smaller units. If the policy wording refers to 2,500 sq m, then this is a very low threshold and development of this scale would compromise the development of employment land to meet the needs of businesses of all sizes.

The policy should therefore adopt a wording that is more like the London Plan.

**Proposed wording:**

- A. *Development proposals must..*
- b. Make provision for an appropriate level of internal fit out beyond shell and core, where appropriate including:*
- i. Connection-ready high speed broadband;*
  - ii. Installation of mechanical and electrical services;*
  - iii. Toilets and kitchenette;*
  - ~~iv. Internal surface finishing and blinds;~~*
  - v. Basic fire and carbon monoxide detection; and*

*vi. Shopfronts and glazing, where appropriate.*

- B. Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) outside of SILs, must consider the provision of a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises (SMES).*

#### **Draft Policy EC4 – Low-cost and affordable workspace**

- D. New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses must make provision for affordable workspace. Developments must provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site. Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits. Off-site provision will be secured through planning obligations. Payment in lieu contributions will be used to support the provision of affordable workspace in Lewisham.*

#### **Position: Object**

- 3.12 In the adopted Local Plan, the Council only require low-cost workspace of developments in Local Employment Allocations but they have now extended this requirement to all new major development proposals.
- 3.13 Policy E3 of the London Plan states that Local Plans “*should consider detailed affordable workspace policies in light of local evidence of need and viability*”.
- 3.14 In formulating draft policy EC4, the Planning Authority have not provided sufficient evidence that the requirement for providing 10% of rentable floorspace at 50% of market rate would be feasible for developers of industrial and warehouse proposals.
- 3.15 The draft policy is informed by Lewisham’s Local Plan Viability Assessment (2022), but this document states that the key findings for testing the viability of affordable workspace are based on Class B1 (now E(g)) uses. The testing excluded use Classes B2 and B8, which would be the predominant forms of development that will come forward at the Deptford Trading Estate site. The evidence for the viability of these thresholds is therefore considered to be insufficient and the draft policy would not be sound.
- 3.16 In addition to the policy not being demonstrably viable for warehouse developments, it is also not practical or deliverable. Given the lack of SIL land in the borough, a typical warehouse development in Lewisham is likely to be major by planning definition, but relatively small scale in terms of the number of business units it delivers. For example, a development of 2,500 sqm in SIL might only deliver one or two units, and yet would attract a requirement for 250 sqm to be affordable. Regardless of viability there would be no way of carving up the unit and associated yard space to achieve this. It also wouldn’t deliver the type and scale of space needed to meet the ‘strategic’ function of SIL, further eroding the borough’s contribution to meeting strategic industrial needs following years of release to housing and other uses.

- 3.17 The current wording would compromise the delivery of new employment development on areas classified as SIL and the draft policy should be amended to provide greater flexibility and not be prescriptive about the exact level of affordable workspace required as this has not been tested robustly as part of the Council's Evidence Base.

**Proposed wording:**

- D. *Outside of SILs new major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses should consider the provision of affordable workspace where this is viable. Developments must provide at least 10 per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site. Where Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits. Off-site provision will be secured through planning obligations. Payment in lieu contributions will be used to support the provision of affordable workspace in Lewisham.*

**Draft Policy EC5 – Strategic Industrial Locations (SIL)**

- B. *Development proposals within or adjacent to SILs must not adversely impact on the function or effectiveness of the SIL to accommodate commercial and industrial uses or their ability to function on a 24-hour basis.*

**Position: Support**

- 3.18 It is important that the SIL locations, as a concentration of industrial and logistical uses, are protected. The reinforcement that these should be capable of operating 24/7 is supported, as SEGRO's experience dealing with industrial occupiers is that most require flexibility for operations during these hours.

**GREEN INFRASTRUCTURE**

**Draft Policy GR5 – Urban greening and trees**

- C. *Major development proposals must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the London Plan, unless it can be suitably demonstrated that this is not feasible. The target UGF score is 0.3 for predominantly commercial development (excluding B2 and B8 uses). Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved.*
- D. *Development proposals should maximise the use of green roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these measures has been fully investigated. Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.*

- E. *Development proposals must seek to retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development. They should also maximise opportunities for additional tree planting particularly in urbanised locations such as streets and town centres.*

**Position: Object**

- 3.19 The London Plan notes that employment development for B2 and B8 development does not have to meet a particular Urban Greening Factor score, but it should take efforts to provide as much as possible. Employment sites need to make best use of land to intensify development where possible and requires large service yard areas to meet operational requirements for HGV manoeuvring etc. There is often little scope to achieve urban greening on site due to these operational constraints.
- 3.20 The requirement to provide financial contributions where a target score is not met should therefore not apply to employment development as there are valid operational reasons, as acknowledged in the London Plan why such development cannot meet these targets and development should not be penalised for this. Draft Policy GR5 should therefore clarify whether financial obligations will be required of employment development if the proposal fails to deliver a satisfactory UGF score.
- 3.21 SEGRO PLC have carried out studies into the feasibility of green roofs and found that they would not be structurally, environmentally, or financially suitable for their buildings.
- 3.22 Even when the lightest types of green roof are considered, when saturated with water, they increase the typical structural load by approximately 50%. Consequently, the building would need to be reinforced using heavier steel sections and the size of the foundation pads would need to be increased, requiring more concrete. Employment units are designed to allow flexible interior spaces with as few columns as possible and using the most efficient construction method to reduce roof loadings. The addition of a green roof goes completely against these design parameters.
- 3.23 Because of the need for more steel and concrete to support a green roof, it is estimated that fitting a green roof would increase the cost of constructing an industrial building by approximately 15%. There are also environmental implications to providing a green roof as the use of additional steel and concrete will increase embedded carbon in the development by approximately 10%.
- 3.24 Green roofs also restrict the ability to provide solar panels and roof lights, which would otherwise help to offset the potential carbon emissions arising from the development by producing renewable energy on site. Green roofs also limit space to fit roof lights, requiring more energy for artificial lighting.

**Proposed wording:**

- C. *Major development proposals must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the London Plan, unless it can be suitably demonstrated that this is not feasible. The target UGF score is 0.3 for predominantly commercial development (excluding B2 and B8 uses). Existing green cover retained on-site will count towards the target score. Planning*

contributions may be sought where the target is not achieved, with the exception of development for B2 and B8 uses.

- D. Development proposals should consider the use of green roofs and walls and incorporate these where feasible. Major development proposals will be expected to demonstrate that the feasibility of integrating these measures has been fully investigated. Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.

## SUSTAINABILITY & ENERGY

### Draft Policy SD3 – Minimising greenhouse gas emissions

- B. Major development proposals must be net zero-carbon and:
- a. Meet the minimum on-site reduction of carbon emissions required by the London Plan; and
  - b. Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).
- C. Where it is clearly demonstrated that the net zero-carbon target cannot be achieved on-site, development proposals must make contributions to meet the identified shortfall through:
- a. A cash-in-lieu contribution to Lewisham’s carbon offset fund; and/or
  - b. Appropriate off-site measures where these can be demonstrated to be deliverable.
- D. Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.
- E. Details of the approach used to meet the net zero-carbon target must be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.
- F. For commercial office development, energy consumption should be reduced to 55 kWh/m<sup>2</sup>/year and space heating demand should be reduced to 15 kWh/m<sup>2</sup>/year.

#### Position: Object

- 3.25 Low carbon growth is a leading objective for SEGRO and this is reflected in its commitment to be a net zero business by 2030. For SEGRO that includes scope 1, 2 and 3 emissions. SEGRO also designs its buildings to help its business occupiers to minimise their emissions, many of which have set their own path to net zero. Business occupiers power demands can vary significantly and the path to net zero will look different as a result.
- 3.26 Many employment developments are undertaken on a speculative basis to provide flexible space (for use across classes E, B2 and B8) that can be occupied, sometimes at short notice, to meet businesses needs. The unregulated emissions from employment buildings can therefore vary dramatically depending on whether it is to be used for general storage,

or potentially a cold store, or a manufacturing use that may have far higher energy demands.

- 3.27 It is therefore unreasonable to require all major developments to provide an assessment of unregulated energy demands when these will not be known and there is considerable variance between what this could comprise. The preparation and examination of the London Plan reached this same conclusion. A possible consequence for Lewisham is that the creative industries and manufacturers who often have some of the higher energy demands will no longer be able to be accommodated in the borough, which would be damaging to the CEZ.
- 3.28 The approach to securing net zero needs to consider a balanced approach and requires upgrades to infrastructure across the UK. It should not be applied on a simple site by site basis as this will penalise employment development.
- 3.29 Section D of draft policy SD3 is too onerous and requires more than Policy SI 2, the equivalent policy in the London Plan. The London Plan states that “development proposals referable to the Mayor should calculate whole-life cycle carbon (WLC) emissions”, which means that many major planning applications in London are not expected to provide WLC assessments. The Borough Council however require WLC assessments from all major applications, which will place unnecessary costs on developers and potentially extend the application process.

**Proposed wording:**

- B. Major development proposals must be net zero-carbon and:*
- a. Meet the minimum on-site reduction of carbon emissions required by the London Plan; and*
- ~~b. Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).~~*
- C. Where it is clearly demonstrated that the net zero-carbon target cannot be achieved on-site, development proposals must make contributions to meet the identified shortfall through:*
- a. A cash-in-lieu contribution to Lewisham’s carbon offset fund; and/or*
- b. Appropriate off-site measures where these can be demonstrated to be deliverable.*
- D. Referable Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.*
- E. Details of the approach used to meet the net zero-carbon target must be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.*
- F. For commercial office development, energy consumption should be reduced to 55 kWh/m<sup>2</sup>/year and space heating demand should be reduced to 15 kWh/m<sup>2</sup>/year.*

## New Draft Policy SD13 – Design to support the circular economy

- A. *Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).*
- B. *Major development proposals should aim to be net zero-waste. Development proposals that meet the threshold for being referable to the Mayor of London must submit a Circular Economy Statement, as part of the Sustainable Design Statement, in line with London Plan policy SI7.*

### Position: Object

- 3.30 As part of its Responsible SEGRO commitments and group policies to minimise waste, SEGRO aims to maximise positive use of waste and materials.
- 3.31 Section B of this policy is onerous and requires more than Policy SI 7, the equivalent policy in the London Plan. The London Plan states that “*referable applications should aim to be net zero-waste*”, which means that many major planning applications in London are not expected to meet this target. The Borough Council however, sets a net-zero waste target for all major developments, which will cover many more developments including some that would be of very small scale. This will create issues at operational stages, particularly for speculative developments where end-users are not known.
- 3.32 This requirement may also deter businesses from locating in Lewisham where the waste requirements are more difficult to meet, instead favouring other boroughs which have a less onerous policy. The Council should therefore follow the wording of the London Plan policy or provide more clarity and guidance on how businesses will achieve net-zero waste.

### Proposed wording:

- A. *Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).*
- B. *Development proposals that meet the threshold for being referable to the Mayor of London should aim to be net-zero waste and must submit a Circular Economy Statement, as part of the Sustainable Design Statement, in line with London Plan policy SI7.*

## CREATIVE ENTERPRISE ZONE

### New Draft Policy LNA3 – Creative Enterprise Zone

- C. *The continued growth and evolution of the creative and cultural industries within the CEZ will be supported, in particular, by:*
  - a. *Ensuring that development proposals protect existing industrial capacity and contribute to making provision for flexible workspace and facilities in suitable locations, at an appropriate range of rents. Development proposals will be considered favourably where they incorporate low-cost and an appropriate amount of affordable workspace,*



*particularly space catered to micro, small and medium sized businesses, including start-ups and independents;*

**Position: Object**

3.33 This policy should complement and not compromise the function of Strategic Industrial Locations (SIL) to operate effectively in meeting the needs of a range of businesses. SIL form London's largest concentrations of industrial and logistical uses and play a key role in supporting the capital's economy. The Council should ensure that CEZ policies to support more creative industries, do not adversely impact on the function or effectiveness of the SIL to accommodate industrial and logistical uses. After all, many of the strategic activities occurring in SILs will, directly or indirectly, service the needs of creative industries, and unlike creative industries it is often not appropriate or possible for these strategic functions to be located anywhere other than SILs.

**Proposed wording:**

*C. The continued growth and evolution of the creative and cultural industries within the CEZ will be supported, in particular, by:*

*a. Ensuring that development proposals protect existing industrial capacity and contribute to making provision for flexible workspace and facilities in suitable locations, at an appropriate range of rents. Development proposals will be considered favourably where they incorporate low-cost and an appropriate amount of affordable workspace, particularly space catered to micro, small and medium sized businesses, including start-ups and independents;*

*b. For Strategic Industrial Locations (SIL) within the CEZ, development should not adversely impact on the function or effectiveness of the location for accommodating industrial and logistical uses serving the borough and the wider city.*

## 4 Summary

Lewisham's Proposed Submission Local Plan contains some key policy provisions that could be potentially problematic for new employment development in the Borough, including the redevelopment of Deptford Trading Estate. Our feedback in response to these draft policies can be summarised as follows:

- Draft Policy QD1 – This policy should clarify which developments should be referred to the Design Panel or developers will face unnecessary additional costs and a lengthier planning application process.
- Draft Policy QD3 – This policy should note that public art provision will likely be a requirement for '*important major*' development, not all major development.
- Draft Policy EC3 – This policy sets a low floorspace threshold for the provision of smaller employment units and is potentially problematic for SMEs looking for floorspace of c. 2,500 sqm.
- Draft Policy EC4 – The Council should provide sufficient evidence to justify affordable workspace requirements in relation to B2 and B8 uses.
- Draft Policy GR5 – The Council should clarify their position on employment developments which cannot deliver a sufficient UGF score. The policy should also acknowledge the potential structural, financial, and environmental issues associated with green roofs and walls in relation to employment buildings.
- Draft Policy SD3 – Requiring WLC assessments of all major developments will mean that developers face unnecessary financial costs and timescales. The policy should follow the wording of the London Plan and limit this requirement to referred applications.
- Draft Policy SD13 – As with Policy SD3, this policy should be reworded so that net-zero waste is a requirement of referred applications, instead of all major applications.
- Draft Policy LNA3 – The Council should review the wording of this policy to ensure that the function and effectiveness of SILs is not undermined.



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Our Ref:  
Your Ref:

24<sup>th</sup> April 2023

Planning Policy Team  
London Borough of Lewisham  
Laurence House  
1 Catford Road  
Catford Road  
London  
SE6 4RU

Dear Sir / Madam,

**LEWISHAM LOCAL PLAN: REGULATION 18 CONSULTATION: WRITTEN REPRESENTATIONS  
OBO FRANK GRIFFITHS**

These representations are made on behalf of our client, Frank Griffiths, in relation to the Regulation 19 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises:

- Lewisham Local Plan: Proposed Submission Document January 2023.
- Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022.
- Integrated Impact Assessment and Non-technical Summary December 2022.
- Habitats Regulations Assessment December 2022

We previously made representations in April 2021 in relation to the Regulation 18 version of the Local Plan. Since the drafting of those representations, our clients' objectives for the site have changed and are now aligned with the Council's continued designation of the site for industrial purposes as part of the Strategic Industrial Location (SIL) insofar as that they will promote an industrial led redevelopment of the site.

**Site Context**

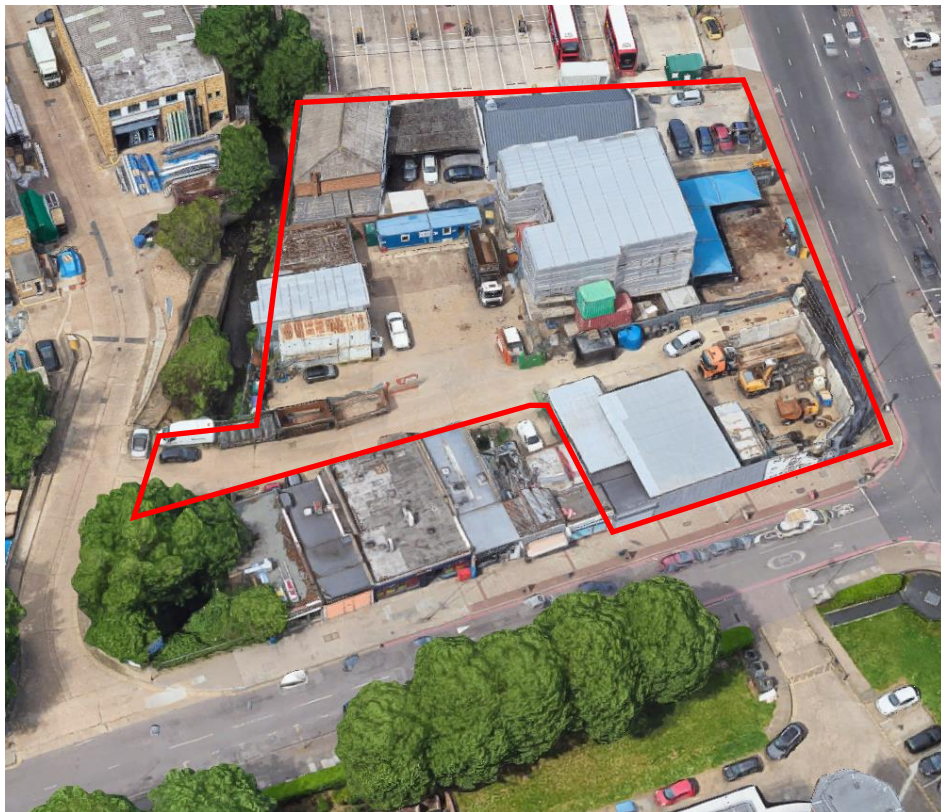
The site is located at the junction of Randlesdown Road and Bromley Road, Lewisham. It comprises several existing buildings and uses as set out in Table 1, below.

<b>Plot</b>	<b>Existing Use</b>
202 - 204 Bromley Road	B2 / B8 - Workshop and Premises
206 Bromley Road	B2 / B8 - Workshop and Premises

208 Bromley Road	Sui Generis – Car Wash
Flat 1 – 208 Bromley Road	C3 - Residential
Flat 2 – 208 Bromley Road	C3 - Residential
Front at 210 Bromley Road	Sui Generis
Land at Rear of 210 Bromley Road	B8 – Land used for storage
Flat A – 210 Bromley Road	C3 - Residential
Flat B – 210 Bromley Road	C3 - Residential
2 Randlesdown Road	B2 / B8 – Workshop and Storage
2a Randlesdown Road	B2 / B8 – Workshop and Storage
4 Randlesdown Road	B2 / B8 – Workshop and Storage

**Table 1: Existing Uses at Randlesdown Road**

A site plan is enclosed at **Appendix I**. Note in the earlier correspondence, no. 4a Randlesdown Road 'Hot-Food Takeaway' was incorrectly noted as being no.4 Randlesdown Road. In fact, 4 Randlesdown Road is lawfully in B2/B8 use. For the avoidance of doubt the redline is annotated over the below aerial image.



**Figure 1 – Site Area**

## **Policy Review**

### *Policy EC2: Protecting Employment Sites and Delivering New Workspace*

We have assessed the supporting text underpinning Draft Policy EC2 and note at para. 8.10 that

*“Our expectation is that there will be no net loss of industrial capacity in the Borough and that net gains are delivered wherever possible. Industrial capacity in Lewisham will be calculated on the basis of the existing commercial and industrial capacity on a site which is currently in active employment use, and covers Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses.”*, whilst in para 8.11,

*“Development proposals should retain industrial capacity and seek net gains through site intensification, including additional floorspace, wherever possible and appropriate. However it is recognised that net gains may not always be feasible. For instance, some types of industrial uses require a significant amount of operational yard or servicing space to function effectively”*

This context, and the formulation of Policy EC2, criteria A, B(a), and Table 8.1, are supported.

### *Policy EC5: Strategic Industrial Locations (SIL)*

We have assessed the formulation of Policy EC5, criteria A – C, and the objectives and requirements of the Policy are supported.

This approach to the Bromley Road SIL is considered in accordance with the London Plan

### *Policy LCA4: A21 corridor*

We note that this Policy refers to the objectives of the A21 Development Framework as adopted in March 2022. We previously engaged with the Council on this document – see our representation dated 11<sup>th</sup> November 2021. The adopted version of the Framework includes Site 10 – Land at Randlesdown Road in which a series of multi-storey non-residential floorspace (c. 4,725sqm).

This is set within the context of the Guiding Principle #2 which seeks to *“... meet local employment and social infrastructure needs”*, the requirement for the re-provision of commercial and employment space to retain local jobs and strengthen local facilities at p.48 and the identification of the site for employment led development at p.49.

The approach in Policy LCA4 criteria A in which *“Development proposals must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach”* is therefore supported.

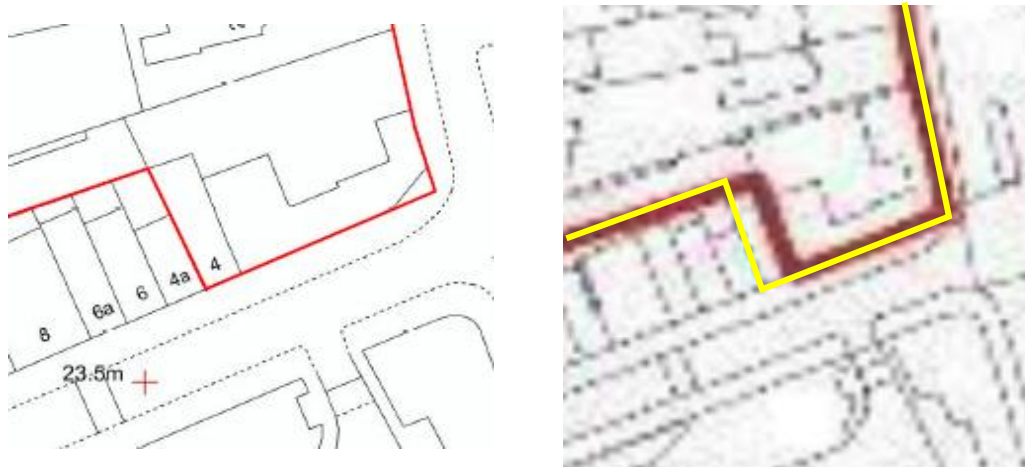
## **Clarification**

The Council includes a revised SIL boundary and designates Bellingham Local Centre Frontages. In identifying properties within each designation, the Council makes minor, but fundamental, errors.

### *Bromley Road SIL boundary*

On p.806 of the Local Plan, the Council notes that the boundary of the Bromley Road includes changes to the shopping frontages along Randlesdown Road de-designated from SIL. The

accompanying change in the Annex 2 Schedule of Changes to Proposals Map demonstrates the land that is de-designated and incorrectly includes 4 Randlesdown Road in this de-designation. Below is the screenshot of the site ownership (left) – inclusive of 4 Randlesdown Road – and the Council's SIL de-designation / Local Centre boundary which is shown to exclude 4 Randlesdown Road. The redline should be moved west to include 4 Randlesdown Road, as demonstrated with the yellow line.



**Figure 2 – Suggested amendments to SIL Boundary**

#### *Bellingham Local Centre Frontages*

On p.808 of the Local Plan, the Council refers to “Randlesdown Road: 4 to 50 and the Fellowship”. On the basis that 4 Randlesdown Road is lawfully in a B2/B8 use – a point that the Council has acknowledged in previous planning applications and appeal decisions (ref: DC/14/087384 / APP/C5690/A/14/2223348), the drafting is incorrect and should read as “Randlesdown Road: **4a** to 50 and the Fellowship”.

In a similar vein, the proposed Bellingham Local Centre is incorrect and should exclude 4 Randlesdown Road and should also consider the squared boundary on the junction of Randlesdown Road and Bromley Road, as per the below image.



**Figure 3 – Suggested amendments to Local Centre boundary**

The incorrect drafting of the SIL boundary and Local Centre boundary renders the plan unsound in that it has not justified given the incorrect boundary. The Council can regularise these fundamental errors by preparing an addendum showing these clarified boundaries and submit this alongside the Regulation 19 Plan and consultation responses to the Planning Inspectorate.

The Council is recommended to consult on these changes, and any other responses and suggested changes received following this consultation response. Given the nature of changes, the Inspector can then instruct these changes to the drafting in the form of main modifications [MMs] to make the plan sound and/or legally compliant.

The wider objectives for the Plan, in the context of the clients objectives for the Site, are consistent with national and strategic planning policy and enables the delivery of sustainable development in accordance with the policies in the Framework.

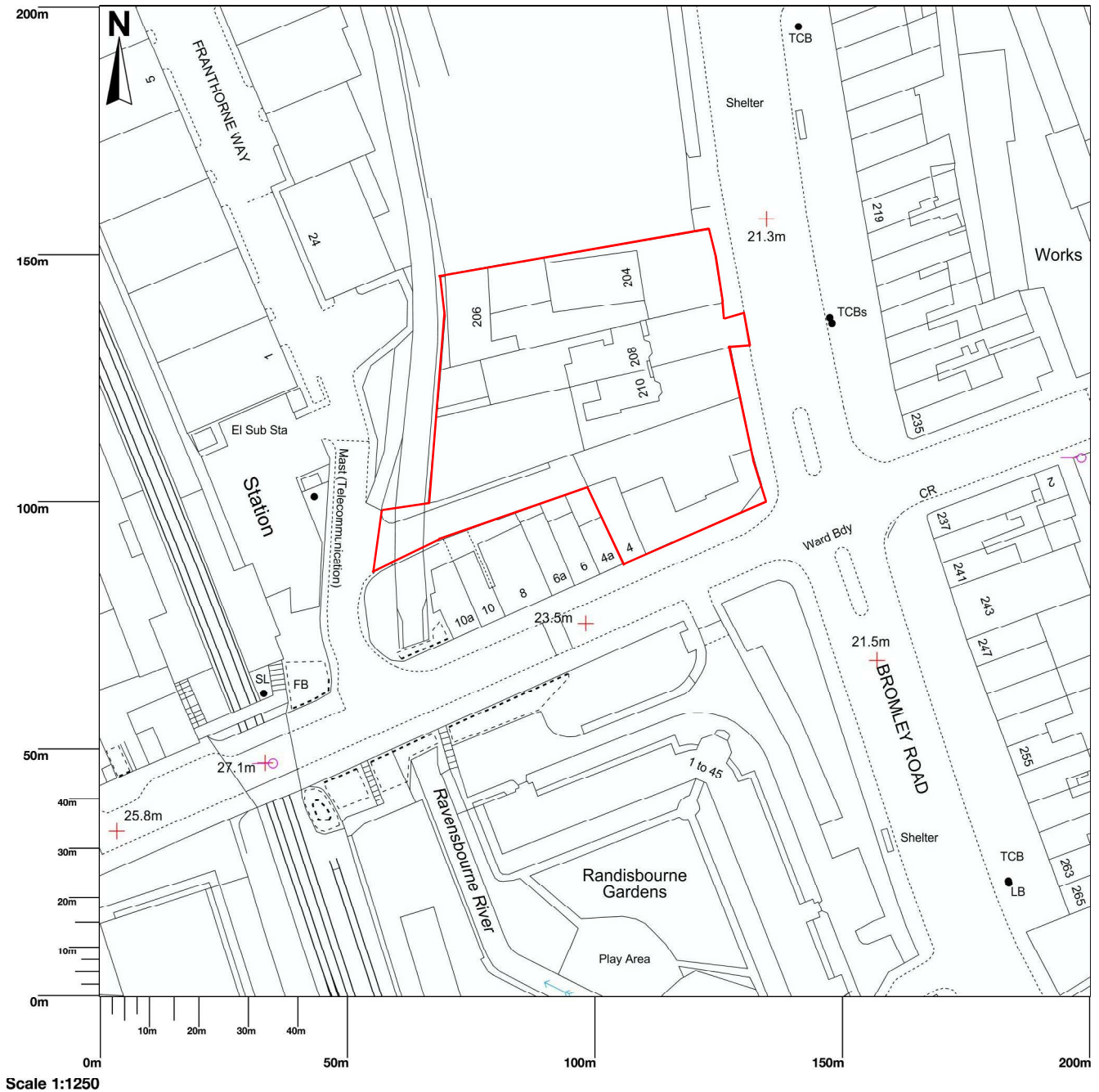
We would welcome the opportunity to be kept informed of progress relating to the document preparation and should you require any further information relating to these representations, then please do not hesitate to contact me.

Yours faithfully



**Simon Fowler**  
**Director**  
**+44 7831 820 634**  
**simon.fowler@avisonyoung.com**  
**For and on behalf of Avison Young (UK) Limited**

## Land at Randlesdown Road and Bromley Road



Map area bounded by: 537753,172232 537953,172432. Produced on 08 April 2021 from the OS National Geographic Database. Reproduction in whole or part is prohibited without the prior permission of Ordnance Survey. © Crown copyright 2021. Supplied by UKPlanningMaps.com a licensed OS partner (100054135). Unique plan reference: p4buk/608805/825711



**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

Title	<input type="text"/>	Address Line 1	<input type="text" value="Knight Frank"/>
First Name	<input type="text" value="Vincent"/>	Line 2	<input type="text" value="55 Baker Street"/>
Last Name	<input type="text" value="Gabbe"/>	Line 3	<input type="text" value="London"/>
Job Title	<input type="text"/>	Line 4	<input type="text"/>
Organisation	<input type="text" value="Knight Frank on behalf of Metropolitan Police Service"/>	Post code	<input type="text" value="W1U 8AN"/>
Telephone number	<input type="text" value="(07799) 708148"/>	E-mail Address	<input type="text" value="vincent.gabbe@knightfrank.com"/>

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

- |   |   |     |    |                                     |                                     |
|---|---|-----|----|-------------------------------------|-------------------------------------|
| <p><b>1. To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?</b></p>  | <p>Chapter name<br/>Monitoring</p>  |     |    |                                     |                                     |
| <p><b>2. To which part of the chosen chapter does you representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)</b></p> | <p>Policy name/number<br/>Policy DM2: Infrastructure funding and planning obligations</p>   |     |    |                                     |                                     |
| <p><b>3. Do you consider that this part of the chapter is legally compliant?</b></p>  | <table border="0"> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> | Yes | No | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| Yes   | No  |     |    |                                     |                                     |
| <input checked="" type="checkbox"/>   | <input type="checkbox"/>  |     |    |                                     |                                     |
| <p><b>4. Do you consider that this part of the chapter sound?</b></p>   | <table border="0"> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table> | Yes | No | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Yes   | No  |     |    |                                     |                                     |
| <input type="checkbox"/>  | <input checked="" type="checkbox"/>   |     |    |                                     |                                     |
| <p><b>5. Do you consider that this part of the chapter is compliant with the Duty to Co-operate?</b></p>  | <table border="0"> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> | Yes | No | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| Yes   | No  |     |    |                                     |                                     |
| <input checked="" type="checkbox"/>   | <input type="checkbox"/>  |     |    |                                     |                                     |
| <p><b>6. Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.</b></p>   |   |     |    |                                     |                                     |

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.  
Continue answer on separate sheet if necessary.*

Policy DM2 (Infrastructure funding and planning obligations) refers to community and social infrastructure and also community safety measures as being areas where section 106 contributions will be sought from developments. However, it does not explicitly refer to seeking contributions from major development to mitigate the impact of crime and the need that arises for additional policing infrastructure.

**Background**

The draft Local Plan refers to the population of Lewisham’s population growing by roughly 20% by 2040. It also refers to the London Plan target of delivering 1,667 net units a year. There will also be a corresponding growth in commercial activity and development. This is a significant amount of development that will have knock on implications for crime rates and policing infrastructure.

Continued on next sheet...

- 7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

Add more explicit reference to the need for policing related section 106 contributions to Policy DM2, or the supporting text.

- 8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

- 9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.***

## Question 6 Continued:

### Policy Recognition Sought

MPS is seeking recognition within the proposed Local Plan that new dwellings and other development increases the need for policing, leading to a legitimate infrastructure requirement that should be accounted for through section 106 contributions. We believe that it is appropriate that this should be set out clearly within the Local Plan, as opposed to any other documents. This is because this document establishes the need for and strategy to deliver new dwellings and other growth that gives rise to the requirement.

### Relevant Appeal and Court Cases

It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within a Section 106 agreement. A number of policing authorities have sought legal advice on this issue and received confirmation of this. The advice also confirms that S106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure and CCTV, staff set up costs, vehicles, mobile IT and the Police National Database. A breakdown of non-building related infrastructure sought by MPS is detailed below.

For example, in the case of *The Queen (on the application of The Police and Crime Commissioner for Leicestershire) v Blaby District Council* [2014] EWHC 1719 (Admin), Judge Foskett stated:

*61... "I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the "consumer view" of the issue. The providers of the service (namely, the Claimant) have statutory responsibilities to carry out and, as the witness statement of the Chief Constable makes clear, that in itself can be a difficult objective to achieve in these financially difficult times. Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police.*

*62. I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area."*

The above conclusions echo those reached in an earlier appeal case of *Land off Melton Road, Barrow-upon-Soar* (APP/X2410/A/12/2173673), in which the Secretary of State endorsed the following findings of the Inspector:

*291... "the twelfth core planning principle of the Framework... can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to paragraph 69, should aim to achieve places which promote, inter alia, "safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.*

There are other more recent appeal and court precedents with the most recent being in 2021. Full details of these can be made available upon request.

### Nature of Contributions Sought

MPS have prepared a charging formula, based on the approach used by other Police and Crime Commissioners and tested through the above appeals and court cases. This seeks contributions towards the following categories of policing infrastructure in connection with new major developments (generally only those referable to the Mayor for London).

- Staff set up costs
  - Uniforms.

- Radios.
  - Workstation/Office equipment.
  - Training.
- Vehicles
  - Patrol vehicles.
  - Police community support officers (PCSO) vehicles.
  - Bicycles.
- Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.
- CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.
- Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.
- The provision of police office accommodation.

## **Section 106 Contributions and Policing Summary**

MPS is working hard to achieve cost savings and find new and alternative sources of capital and revenue funding to support policing in London. Section 106 charges to support policing at Borough level are necessary and appropriate. As such, we ask that this be acknowledge within the Local Plan and / or Infrastructure Delivery Plan.

**Lewisham Local Plan – Proposed Submission document Regulation 19 draft Consultation Questions**

This form has two parts

Part A – Personal details to be completed once

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A - Personal Details**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

Title	<input type="text"/>	Address Line 1	<input type="text" value="Knight Frank"/>
First Name	<input type="text" value="Vincent"/>		<input type="text"/>
Last Name	<input type="text" value="Gabbe"/>	Line 2	<input type="text" value="55 Baker Street"/>
Job Title	<input type="text"/>	Line 3	<input type="text" value="London"/>
Organisation	<input type="text" value="Knight Frank on behalf of Metropolitan Police Service"/>	Line 4	<input type="text"/>
Telephone number	<input type="text" value="(07799) 708148"/>	Post code	<input type="text" value="W1U 8AN"/>
		E-mail Address	<input type="text" value="vincent.gabbe@knightfrank.com"/>

**Part B (Please use a separate sheet for each representation)**

Please note that all representations will be made public along with the name of the person making the submission, all other personal information will be kept confidential.

All representations will then be submitted to the Secretary of State and the Planning Inspectorate along with the Lewisham Local Plan - Proposed Submission Document and its supporting documents in due course.

- 1. **To which chapter of the Lewisham Local Plan – Proposed Submission document does your representation relate?**  
Chapter name  
Housing
  
- 2. **To which part of the chosen chapter does your representation relate? (Representations must be made on a specific policy within the chapter. Please state the policy number and name in the box below)**  
Policy name/number  
Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House, near Horniman
  
- 3. **Do you consider that this part of the chapter is legally compliant?**  
Yes  No
  
- 4. **Do you consider that this part of the chapter sound?**  
Yes  No
  
- 5. **Do you consider that this part of the chapter is compliant with the Duty to Co-operate?**  
Yes  No
  
- 6. **Please give details of why you consider this part of the chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.**

*If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.  
Continue answer on separate sheet if necessary.*

We consider that the deletion of Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House means that the draft plan is not positively prepared or justified. We understand from the Council’s summary of Regulation 18 representations and responses that the proposed allocation was deleted because of a single representation, objecting to the proposed allocation. This raised concerns about a potential loss of trees, impact on wildlife and also the need for further consultation.

It was also suggested that the allocation was at odds with objective 9, which seeks to 'Promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets'.

Continued on next sheet...

**7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

*(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. **Continue answer on separate sheet if necessary.***

Re-instate the proposed site allocation for Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House. If necessary, the site allocation can be adjusted to acknowledge the need to consider trees, wildlife and consultation.

**8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes

No

(I do wish to participate in an examination hearing session) (I do not wish to participate in an examination hearing session)

**9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. *Continue answer on separate sheet if necessary.***



## **Question 6 Continued:**

The Council's response confirms that the allocation will be deleted, but notes that the site is over 1.5 hectares and therefore warrants inclusion as a strategic site. The Council also refers to the expectation that a planning application may be received and would be considered against other policies in the plan.

We do not believe that the issues raised in the objection impact on the principle of development for this site. If there are concerns about trees, wildlife, or the need for consultation these should be addressed in the wording of the proposed allocation or adjusting the potential dwelling yield of the site.

We also note that the National Planning Policy Framework encourages Local Authorities to have regard for the need to make effective use of land. In this regard, paragraph 121 of the NPPF states that "Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them." The subject site involves public land, where the Council has already identified that development proposals are likely to come forwards. The NPPF seeks a proactive approach to the delivery of such land. If the plan remains silent, this appears to run counter to the content of the NPPF.

## **Regulation 19 consultation response- Lewisham Local Plan**

- 1.1 This is a response to the proposal in the Proposed Policies Map (Jan. 2023) <sup>1</sup> to include land bounded by Courtrai Road, Eddystone Road, rear boundaries of properties in Buckthorne Road and the New Cross to Forest Hill railway cutting in Crofton Park as Metropolitan Open Land. The site is part of that referred to as 'MOL Area W' in the Metropolitan Open Land Additional Sites Report<sup>2</sup> prepared by Arup for LBL. The response is on behalf of the landowner.
- 1.2 LBL (website) say that Regulation 19 consultation responses are to be limited to the following aspects of the LLP:
- (i) Is the plan legally compliant? Does the plan comply with the relevant legislation and regulations in the way it has been prepared and in its content?
  - (ii) Does the plan comply with the duty to co-operate? (refers to adj. LAs and prescribed bodies).
  - (iii) Is the plan 'sound'; has the plan been positively prepared? Is it robustly justified and evidence led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

Whilst it is intended to address the criteria set out in (iii) it should be noted that this is one of nine additional proposed MOL sites that LBL have introduced at a late stage after Regulation 18 consultation of April 2021 (the Additional Sites document is dated 9.12.21 and the Proposed Policies Map, January 2023). Thus it is not considered that a response on these lately added proposals should be constrained in the manner that proposals forming part of the Regulation 18 consultation have been. Further to this, with regard to process, the LBL document 'Local Plan: Main Issues & Preferred Approaches'<sup>3</sup> says, in para.104, 'Green Infrastructure': *'There are also areas of MOL which are designated through the London Plan.'* No further reference is made to MOL in this document so reading it one would assume that the intended vehicle for MOL designation was the London Plan rather than the Lewisham Local Plan.

- 2.1 The site is rectangular in shape and measures a little over 1ha. It is bounded to the west by the cutting of an active railway line and to the east by the back gardens of houses in Buckthorne Road (mainly two storey, terraced late Victorian). It is bounded to the south by a cul-de-sac (Courtrai Road) which terminates in front of the site. To the north is a pedestrian/cycleway- Eddystone Road- leading to a bridge over the railway. At the south end, some 20m from Courtrai Road, is a single storey building of 290m<sup>2</sup> previously used as a Scout hut. It is in poor condition.
- 2.2 It is relevant to the case being made here to understand that the site has two parts. To the south, taking up some 20% of the site, is a single storey building built post-war as a Scout hut and its curtilage. On the remainder of the site is an embankment, in parts some 3-4m higher than the surrounding ground to the east. The two parts are divided by a chain-link fence with concrete posts. This division of the site into two distinct parts is clearly seen in the Ordnance Survey map of 1893-1896<sup>4</sup>. It is likely that the embankment is made-up land, consisting of spoil created from the excavation of the Croydon Canal (1809-1836) which occupied what is now the adjoining railway cutting. n.b. there is a similar embankment on the opposite side of the railway cutting. The 1893/6 OS map does not show a building where the Scout

hut now stands and the reason for this division within the site is not known. It is notable that this OS map illustrates trees on the 'Scout hut curtilage site' but not on the embankment.

- 2.3 It is not this objector's case that the site does not have merit in terms of biodiversity; it may be that the owner's non-intervention has contributed to that biodiversity; that the land has been 'rewilded'. The site was designated a Site of Metropolitan Importance for Nature Conservation in the extant local plan. It should be said that this is 1 hectare out of 614ha of SINC's in Lewisham, over 63 sites according to the Lewisham SINC's re-survey report of 1/15-5/16 by the Ecology Consultancy<sup>5</sup>. Exactly what the contribution to biodiversity is made by this particular site is unclear. The Ecology Consultancy say *Trackside botanical surveys have been recommended at the Forest Hill to New Cross Gate Railway Cutting to provide further information on species present. This was difficult to ascertain from bridges and adjacent boundaries.* They calculate that the railway cutting as a whole contains 11.8ha of woodland and say that over half of this is non-native woodland, commenting that *'..native woodland is naturally more valuable to wildlife.'* Similarly Arup in their additional sites review say, of 'Area W' in particular, *'The assessment is based on aerial photography and limited views from the public highway..'*
- 2.4 Arup rely on their assessment as they describe it above to argue that 'Area W' meets the Mayor of London's criteria for designating MOL as set out in policy G3(B) of the London Plan 2021<sup>5</sup>, viz.

***The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:***

- 1) It contributes to the physical structure of London by being clearly distinguishable from the built-up area***
- 2) It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London***
- 3) It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value***
- 4) It forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria.***

In the objector's view it is questionable that the observations of the site made by both of these firms of consultants merit being called the proportionate evidence required to be characterised as being 'robustly justified and evidence-led.'

- 2.5 In the case of the Arup study which relates directly to the MOL proposal they place reliance on the assumed biodiversity of the site to say that criterion 3) of the London Plan policy as quoted above is met. However on p.90 of their report they say that the site scores as 'moderate' in their assessment because the *whole parcel has metropolitan diversity value.* i.e. the value of the site in terms of biodiversity is dependent on its relationship with other sites. There does not appear to have been any new ecological survey of the site and it appears that its biodiversity merits, according to Arup, are based on the local plan designation (the extant local plan having been published in 2005). Indeed, in reference to the Buckthorne Cutting Nature Reserve (part of 'Area W') Arup advise that *'..no access was available during*

*the site visit.* n.b. the author(s) of the Additional Sites Report are not identified and it is not stated that an ecologist was involved in its preparation.

- 2.6 The 1945 post war aerial photographic survey of London <sup>8</sup> shows that a substantial part of the site did not have trees; the 1893-6 OS map shows trees on the 'Scout hut' site (pre Scout hut) but not on the remainder and mapping of 1798-1809 appears to show the site as fields north of woodland. Additionally we are advised (Re-survey of SINC in Lewisham<sup>5</sup>) that the majority of trees in the New Cross to Forest Hill cutting are non-native, so this piece of land does not appear to be an arboricultural asset of great antiquity and value consequent on age. The site does not appear on the Woodland Trust's Ancient Tree Inventory or Natural England's equivalent record woodland and trees. Nevertheless it has been referred to by some as ancient woodland. This respondent's view is that as the site is believed to be substantially formed of spoil from the canal/railway cutting that on site trees would post-date those excavations in the early 19<sup>th</sup> century. The site does however have an area Tree Preservation Order<sup>7</sup> covering the wooded embankment and individual TPOs and a group TPO covering trees within the Scout hut curtilage.
- 3.1 It is not clear to the objector what the purpose of designating this site as MOL would be. There are strong development management and arboricultural controls exerted by the SINC and TPOs. In their 'Strategy and recommendations' for Area W Arup say: *'The parcel's local recreational and metropolitan biodiversity value should be conserved. The recreational value of the parcel could be significantly enhanced through providing pedestrian routes north to south parallel to the railway line.'*
- 3.2 The Arup conclusion is thus not suggesting action should be taken vis a vis biodiversity and *'local recreational value'* merely that the status quo be *conserved*. With regard to 'pedestrian routes' it is important to look at the configuration of 'Area W'. North of Eddystone Road the site consists of the substantial railway cutting plus a strip of land some 50m wide. The same applies to the site between Eddystone Road and Courtrai Road, the site whose inclusion as MOL is being contested here. But south of Courtrai Road the site is the railway cutting only. If the suggested path is to go to its logical end- Honor Oak station- it would be within operational railway land. Whether Network Rail would find this acceptable is a question for them. To achieve a recreational path over the whole north-south extent of the site would mean either it being within the railway cutting throughout or 'dog-legging' from the cutting south of Courtrai Road into the Scout hut curtilage.
- 3.3 It is unclear to the objector what bearing an MOL designation would have on the sole aspiration for change in Area W- recreational path(s). No such linkage is made in the evidence in the Metropolitan Open Land Review. Whilst some large open spaces- Beckenham Palace Park for example- can accommodate both biodiversity and recreation that is hardly the case here where the site is predominantly dense woodland. Recreational activity of any substance here may well be to the detriment of the existing eco-system.
- 4.1 Focussing on the longstanding sub-division of the site between the Scout hut and curtilage and the remainder, the objector is of the view that the former is previously developed or 'brownfield' land. It meets the definition of such land set out in Appendix 2 of the NPPF being: *'Land which is or was occupied by a permanent structure, including the curtilage of the developed land.'* whilst the Scout hut is not in a good condition it is not in the excluded from brownfield land status category *'..where the remains of the permanent structure or fixed surface structure have blended into the*

*landscape.* Inasmuch as an MOL designation may be seen as being incompatible with the government's general approach to brownfield land it is inappropriate for the Scout hut and curtilage.

- 4.2 The objector does not take the view that the part of the site outwith the Scout hut curtilage is brownfield land. However, neither cartographic resources or aerial photography suggest that it is some sort of remnant of historic forest (although of course centuries ago it may well have been wooded). As set out in 2.6 above we think it unlikely that trees on the embankment on this part of the site are likely to be more than two hundred years old. The metropolitan SINC designation, albeit that no site walkover was undertaken in the 2016 SINC review, is considered to be sufficient protection for this part of the site (along with the TPO).
- 5.1 In conclusion it is considered that the site in question should be considered to consist of two parts. The scout hut and its obvious curtilage as delineated by a fence is undoubtedly brownfield land. As MOL is deemed equivalent to Green Belt the relevant NPPF policies should be paid heed to. MOL designation would serve none of the five purposes of Green Belts as set out in para.134. Green Belt designation must *a) demonstrate why normal planning and development management policies would not be adequate* (para. 135). In our view such policies along with the TPOs and SINC designation are perfectly sufficient protections for this site and the contrary has not been demonstrated. The exclusion of the Scout hut and curtilage from MOL designation does not preclude there being a strategic green corridor. It merely makes it equivalent to the land within 'Area W' south of Courtrai Road which is formed of the railway cutting only.
- 5.2 As to that part of the site north of the Scout hut and curtilage it is not the respondent's case that it is also brownfield land. Nevertheless there is concern that the evidence used by LBL to demonstrate compliance with London Plan policy G3B is not robust and evidence led. The marking by Arup of 'Area W' as 'moderate' in terms of the biodiversity component of London Plan policy G3(B)(3) is inadequately evidenced and is not the product of any contemporary scientific research. The strategic corridor referred to in London Plan policy G3(B)(4) is the railway cutting. The respondent's site is separated from the parts of Area W to the north and south by Eddystone Road and Courtrai Road respectively and is not a contiguous corridor for wildlife, unlike the railway cutting which is.

## References

- 1 LBL Regulation 19 Policies Map
- 2 LBL Metropolitan Open Land Review 'Additional Sites Report' by Arup 9.12.21
- 3 LBL Local Plan: Main Issues and Preferred Approaches January 2021
- 4 Ordnance Survey Map 1893-1896
- 5 Re-survey of Sites of Importance for Nature Conservation in Lewisham: Habitat Surveys by The Ecology Consultancy January 2015-May 2016
- 6 London Plan 2021. Mayor of London

- 7 Tree Preservation Order confirmed 26.3.98
- 8 1945 War Department aerial survey

20 April 2021



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Dear Sir / Madam,

## LEWISHAM LOCAL PLAN REGULATION 19 PROPOSED SUBMISSION DOCUMENT REPRESENTATIONS SUBMITTED ON BEHALF OF NOTTING HILL GENESIS

We are instructed by Notting Hill Genesis (NHG) to submit representations in response to the Lewisham Local Plan Regulation 19 'Proposed Submission Document' January 2023 ("the draft Local Plan") in the context of their land ownership at 1-25 Malham Road Industrial Estate ("the site"), located within the London Borough of Lewisham (LBL). Attached is a plan of the site outlined in red in **Appendix A**.

The site has significant redevelopment potential and we consider it could deliver a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. This letter should be read in conjunction with the previous representations (dated 09 April 2021) submitted to the Council in response to the Lewisham Local Plan Regulation 18 'Main Issues and Preferred Approaches Document' January 2021.

### Background

#### *Notting Hill Genesis*

NHG is a non-profit housing developer, member of the G15 group of major London housing associations and a registered provider of social housing. NHG own and manage more than 66,000 homes in London and the southeast. NHG work in the community, providing homes for around 170,000 people along with social programmes, economic regeneration initiatives and the services and support residents' needs. 583 of these homes are in Lewisham, which are a mixture of General Needs, intermediate tenures, Market Rent and Temporary Housing, NHG is keen to extend their reach within Lewisham and help the Council deliver their strategic goals and housing targets.

NHG's primary purpose is to provide homes for lower-income households in and around London. NHG have a record of strategic regeneration across London to deliver high quality market and affordable housing. NHG excel in creating high quality new homes and provide a wide range of housing solutions, working closely with residents and partners to meet local needs.

#### *Site and Planning Policy Context*

The site is circa. 0.57 hectares and is bound by Beadnell Road to the west, Dalmain Road to the north, industrial units to the east and Malham Road to the south. The site comprises of five, single storey industrial buildings accessed via a private entrance off Malham Road and accommodates 23 commercial units currently used for light industrial and storage (Use Classes B2 and B8) and office uses (Use Class E, formerly B1). The site forms



part of the wider Malham Road Industrial Estate, which is circa 3.63 hectares and accommodates a mix of uses including a place of worship, hot food takeaways and residential uses.

The wider area on Beadnell Road and Dalmain Road comprise of predominantly residential uses within two and three storey Victorian terraces. The site is situated in close proximity to Forest Hill District Town Centre, which lies approximately 800m (9 minute walk) south of the site and contains numerous shops, services and community facilities.

The site has a Public Transport Accessibility Level (PTAL) rating of 2, indicating moderate accessibility to public transport out of a maximum score of 6b. The site is located approximately 800 metres (9 minute walk) from Forest Hill Station, providing access to Southern and London Overground services. There are also a number of bus stops located on A205 Stanstead Road, providing access to Lewisham Shopping Centre and Plumstead.

The site is subject to the following adopted (current) planning policy designations:

- Forms part of site allocation ref.SA50 Malham Road Local Employment Location;
- PTAL 2;
- Flood Zone 1; and
- The building is not locally or statutorily listed, nor are there any locally or statutorily listed buildings located in the immediate surrounding area. The site is not located within a Conservation Area.

The draft Local Plan proposes that the site be subject to the following emerging planning policy designations:

- Forms part of a Locally Significant Industrial Estate (LSIS);
- Located within a Growth Node; and
- Located on a Growth Corridor.

We note the draft Local Plan references or illustrates the site and the wider Malham Industrial Estate in Table 8.1 (Lewisham’s Employment Land Hierarchy) – LSIS; Figure 8.1 (Employment Land Hierarchy); Figure 18.2 (West Area Key Diagram); and Schedule 4 (Designated employment land).

## **Lewisham Local Plan Regulation 19 Proposed Submission Document – Representations**

### *Commercial and Mixed Use Redevelopment*

Previous representations (including a ‘call for sites’ form) in relation to the site were submitted to the Council on 09 April 2021. The ‘Lewisham Local Plan Regulation 18 Consultation Statement’ dated September 2022 sets out the Council’s response, which highlights that whilst the site has not been added as an allocation at this stage of the plan process, the site may be considered through a plan review in due course. A specific response in relation to the site’s LSIS designation is provided as follows:

*“Comments are noted. The designation of Malham Road Industrial Estate as an LSIS has been informed by the Lewisham Employment Land Study that identifies the site as a successful employment site with low vacancy rates and high demand for employment uses. Fragmentation of the site, through co-location, will restrict the operational nature of the employment uses, undermine the viability of this important LSIS and will be contrary to ensuring sufficient industrial land and capacity to meet the Borough’s future needs.”*

It is important to emphasise that the Employment Land Study 2019 (‘the Study’) does not reference Malham Road Industrial Estate as a ‘successful employment site’. On the contrary, the Study identifies that the existing units are generally of poor quality and dated, and that some units are coming towards the end of their economic life. Appendix 1 (C15) of the Study further sets out that the site has low compatibility with its surrounding residential uses and that some units may not be reoccupied if they become vacant due to their poor quality. The Study additionally references a ‘to let’ sign at the entrance of the estate and that some of the older units appeared to be vacant. Whilst these units have now been occupied with short-term tenants, the deteriorating



condition of the units means that it is becoming increasingly difficult to secure tenancies as occupiers continue to seek a better grade of offering.

The Study states that such sites should seek to intensify wherever possible and emphasises that there is an opportunity to redevelop the more dated units to provide better quality units that meet modern occupier requirements. An extract is provided below:

*“The estate is compact and there is limited yard space and most of the units have a limited number of parking spaces. The location is not optimum, being situated within a residential area, with poor prominence and access to amenities. Currently, there is low vacancy on the site and the units are generally dated and seem to have been built at different points in time. But the estate is in a well-defined area and there is demand for this type of industrial accommodation. There is an opportunity to redevelop the more dated units to provide better quality units that meet modern occupier requirements.”*  
[Own Emphasis].

It is important to highlight that the Study is now over 4 years old and prepared prior to Brexit, the Covid-19 Pandemic, and the London Plan (2021). The London Plan Policy E7 (Policy E7 Industrial intensification, co-location and substitution) states that all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. The London Plan further encourages more efficient use of land through higher plot ratios having regard to operational yard space requirements and to also take a proactive approach to the management of vacancy rates to reach a level appropriate to the efficient functioning of the industrial market.

The key observations from the Study, as well as a CoStar Quality Assessment (see Appendix B) is that the site generally contains a high proportion of poor quality and dated buildings and has a generally low plot ratio, with parts of the site to the west, which comprise single storey buildings with generous yards, having a plot ratio of 36%, which falls significantly short of the London Plan’s 65% target ratio.

Co-location would not fragment the site, undermine viability, restrict the operational nature of the employment uses or be contrary to ensuring sufficient industrial land and capacity to meet the Borough’s future needs. On the contrary, given the inefficient, poor quality and dated nature of the units, as well as the already wide number of uses outside of commercial and light industrial use on the site (including a place of worship, hot food takeaways and residential), we consider in-principle policy support to allow intensification to occur via a mixed use redevelopment would incentivise a range of options and provide a robust approach to withstand current and future challenges and provide better quality units that meet modern occupier requirements. This would provide more certainty to support the long-term viability of the site as a successful and sustainable employment location, as well as providing the opportunity to deliver other public benefits e.g. affordable housing. In practice, without in-principle policy support, we consider demand will continue to fall exponentially as units become more dated.

We would highlight that Malham Road Industrial Estate appears to be the only employment site with ‘mixed B uses’ referenced within table 5.1 (employment site assessment summary) of the Study where intensification via co-location is not acceptable. This would seem somewhat inconsistent and contrary to the draft Local Plan’s Key Spatial Objective (7) to “*protect and enhance the employment quarter at Malham Road*” as well as draft Policy LWA3 and EC2.

Draft Policy LWA3 (d) states that the growth and evolution of Forest Hill District Centre and its surrounds as a key hub of creative, cultural and community activity will be supported and reinforced by “*extending the boundary of the Malham Road LSIS to include 118 Stansted Road, along with protecting and enhancing uses within the LSIS that make a positive contribution to the Cultural Quarter*”. It is not understood how the site could make a positive contribution to the Cultural Quarter without co-locating complimentary uses, including residential.

The draft Local Plan policy EC2 (Protecting employment land and delivering new workspace) states that within LSIS, proposals should retain and wherever possible deliver net gains in industrial capacity, including by intensifying the use of land.

Given the above, we consider the current drafting of the draft Local Plan policies to be inconsistent, overly-prescriptive and insufficiently flexible and therefore unlikely to support the site's full redevelopment potential and long-term viability as a successful and sustainable employment location. The draft Local Plan is therefore **not justified or effective** and **not consistent** with the London Plan (specifically Policy E7) because it does not promote, support or encourage the potential intensification of the Site. It is also **not consistent** with national policy, which requires planning policies support development that make efficient use of land.

We therefore respectfully request the site be designated as a Mixed Use Employment Site Allocation to include industrial and residential uses, which would be more fitting to its function and residential location within a Growth Node and Growth Corridor. There is a significant opportunity for the site (and potentially the wider Malham Industrial Estate) to meet a range of priorities for Lewisham, including the delivery of an enhanced employment provision, new homes and new affordable homes.

The draft Local Plan's definition of a 'Mixed Use Employment Location (MEL) is:

*"Designated land within Lewisham's employment land hierarchy. MELs consist of large redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support strategic regeneration objectives."*

In light of the site's wide number of uses outside of commercial and light industrial use, and the underused (i.e. see commentary regarding plot ratio above) and generally dated nature of units, we consider the site would wholly meet the Council's definition of a MEL. This would enable the site to support the strategic regeneration objectives outlined within the draft local plan Key Spatial Objective 7 and policies EC2 and LWA3.

This would ensure that the draft Local Plan is **justified, effective** and **consistent** with national and regional policy.

#### *Residential*

NHG fully supports draft Local Plan Policy HO1 that makes appropriate reference to the London Plan Table 4.1 which sets out a minimum 10 year housing target for Lewisham of 16,670 new homes over a 10 year period (2019/20 to 2028/29) which equates to 1,667 per annum. We also note the inclusion of an up to date housing trajectory and five year housing supply for the Borough. This sets out that the Council will ensure that the London Plan ten year housing target is exceeded. However, it is important to note the Lewisham SHMA (2022) indicates a significantly higher housing need for Lewisham of 2,334 per annum over a 10 year period (2021 to 2031) which includes a cap based on the 2021 London Plan figure. Without the cap, the minimum need is 3,336. A comprehensive design led mixed use redevelopment of the site would make a significant contribution towards housing provision and the above housing targets.

NHG strongly advocates for the delivery of new affordable homes to meet Lewisham's housing requirements. NHG acknowledges the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability. We fully support clarifications to Policy HO3 Part F (Threshold approach to viability) and Part G (Viability Tested Route) that ensure conformity and consistency with the London Plan and the Affordable Housing and Viability Supplementary Planning Guidance. We also note that the Lewisham SHMA (2022) indicates that Lewisham's median house prices are more than 10 times the average household income, resulting in a net need for 2,818 affordable dwellings each year. The site represents a key opportunity for the delivery of a mixed use redevelopment brought forward by a leading housing association to significantly contribute towards affordable housing and associated housing targets in Lewisham.

## Public Examination

On behalf of our client we consider it is necessary to participate in the Examination in Public (EiP) in due course, including attending the oral part of the EiP. We would be grateful if you could keep us updated.

### Conclusion and recommendations:

Whilst NHG is generally supportive of the 'spirit' of the draft Local Plan which seeks to improve employment provision and provide new homes and new affordable homes, there are a number of policies which require further consideration and updating as elaborated in this letter and previous representations dated 09 April 2021.

The current policy approach to the site and wider Malham Road Industrial Estate would constrain any intensification and potential redevelopment options at the site. The draft Local Plan as currently drafted is **not effective** in its delivery, would **not be consistent** with national policy and would **not be consistent** with the London Plan or its own strategic objectives and policies. The draft Local Plan as currently drafted is therefore not sound. However, with further amendments, we consider there is the potential that the draft Local Plan could be sound. It is considered that the suggested amendments will allow development to be optimised in the Borough and for housing to be delivered ambitiously to meet housing need.

To reiterate, the site has significant redevelopment potential and we believe it could provide a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. This would provide more certainty to support the long-term viability of the site as a successful and sustainable employment location. NHG are committed to working with the Council to help deliver their strategic goals, the regeneration of sites in the Borough and benefits to local communities.

We would be delighted to also meet with officers and other relevant parties to further discuss the site's opportunities. Please do not hesitate to contact either myself or my colleague William Priestley (07816 184 092 [william.priestley@savills.com](mailto:william.priestley@savills.com)) to arrange a meeting, and/or if you have any further queries. In the meantime we would be grateful if you could keep us updated on the progress of the draft Local Plan.

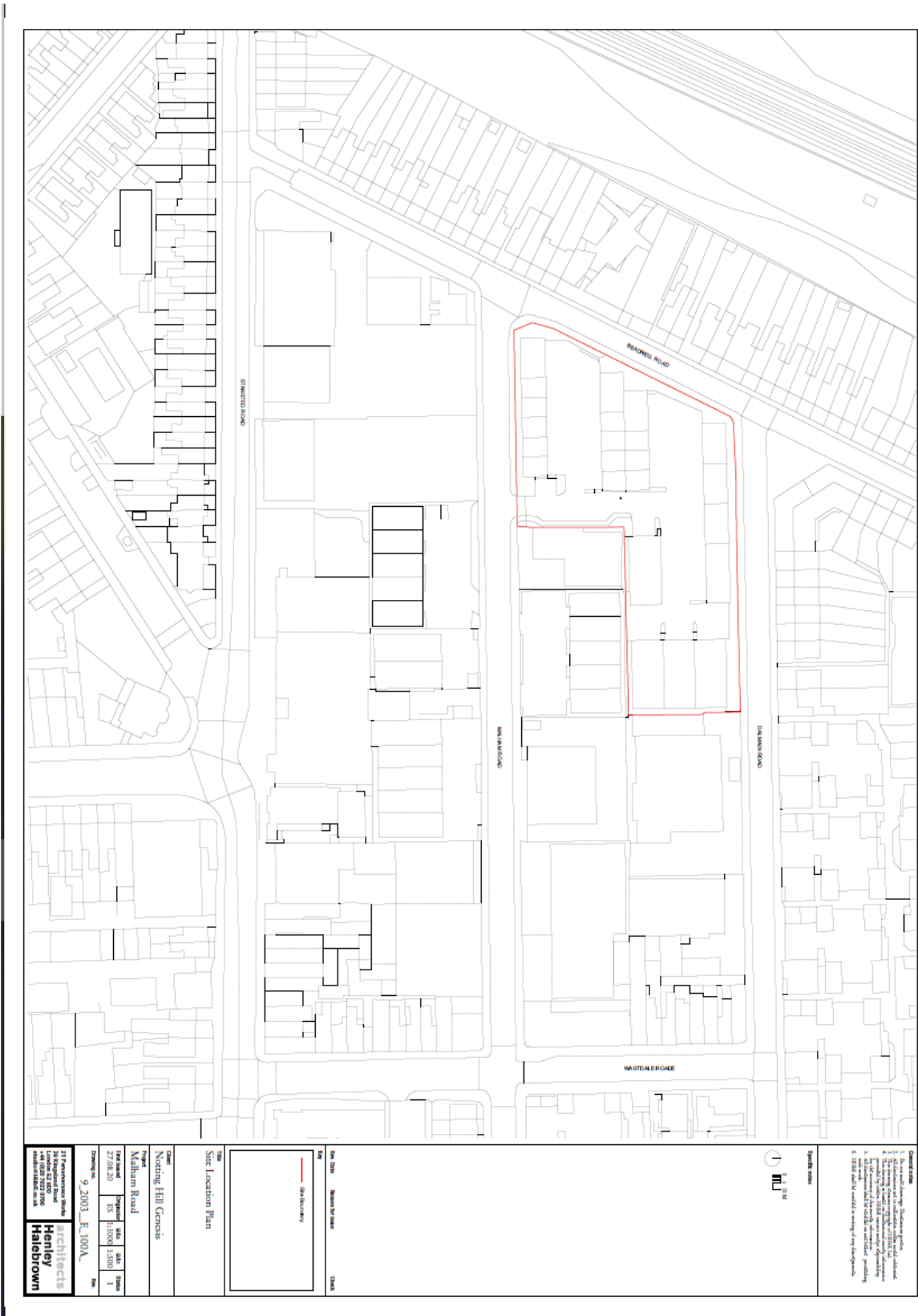
Yours sincerely,



Richard Ketelle  
**Senior Planner**

Encl. As above  
cc Notting Hill Genesis

Appendix A: Site Location Plan



<p><b>Project Information</b></p> <p>Client: <b>Nottingham Hill Circus</b></p> <p>Project: <b>Walsham Road</b></p> <p>Site name: <b>Plot 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000</b></p>		<p><b>Site Location Plan</b></p>	<p><b>Scale</b></p> <p>1:1000</p>	<p><b>North Arrow</b></p>	<p><b>Legend</b></p> <p>Red line: Site boundary</p>	<p><b>Notes</b></p> <p>1. The site is shown in red.</p> <p>2. The site is shown in red.</p> <p>3. The site is shown in red.</p> <p>4. The site is shown in red.</p> <p>5. The site is shown in red.</p> <p>6. The site is shown in red.</p> <p>7. The site is shown in red.</p> <p>8. The site is shown in red.</p> <p>9. The site is shown in red.</p> <p>10. The site is shown in red.</p>	<p><b>Contact Details</b></p> <p>217 Pennington Road              London E14 3DF              Tel: 020 7733 3000              Fax: 020 7733 3001              Email: info@savills.com</p> <p><b>architects</b>  <b>Henley</b>  <b>Halebroton</b></p>
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**Appendix B: Malham Road Industrial Estate Building Quality**

**3.5 Building Quality**

Most buildings are of average or below average quality.

CoStar Quality Assessment:

- 1-2 star is below average
- 3 star is average
- 4-5 star is above average

The NHG site has single storey buildings in below average condition.

