

6. PPS4 Compliance Statement on behalf of Renewal New Bermondsey Two Ltd

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Appendix One

Quantitative Assessment

1. Introduction

- 1.1 This statement has been produced on behalf of Renewal New Bermondsey Two Ltd (Renewal) to support an outline planning application for a major, highly sustainable, mixed use, sports focused, development on land known as “Surrey Canal”.
- 1.2 Surrey Canal is located at the north western edge of Lewisham at the boundary with the London Borough of Southwark (LB Southwark) and forms the closet part of the London Borough of Lewisham (LB Lewisham) to central London. The submitted outline planning application extends to some 10.05 hectares of previously developed land and proposes development of up to 250,000 sq m of mixed use development on land around and incorporating Millwall Football Stadium. The Site is allocated within the proposed Lewisham/Catford and New Cross Opportunity Area within both the current London Plan and the Draft Replacement London Plan 2009 and is a proposed Strategic Site Allocation within the Lewisham Local Development Framework (LDF) Core Strategy 2010 and is thus identified as an area for major regeneration.
- 1.3 This application is a comprehensive response to this policy framework promoting the significant redevelopment of the Surrey Canal area. The current proposals by Renewal propose a sustainable, “*sports focused*” development to bring significant sporting and regenerative benefits both to the local area and the Borough of Lewisham as a whole.
- 1.4 The application seeks outline planning permission for the development of up to 250,000 sq m (sq m) of development floorspace (gross external area (GEA)) on the application site.
- 1.5 Further details on the nature of the Proposed Development is set out within the accompanying Development Specification Document and Parameter Plans which are submitted with the Planning Application for approval.
- 1.6 This statement addresses the relevant PPS4 policy issues in respect to the main town centre uses which are proposed as part of the Proposed Development and forms part of the comprehensive planning application for the proposed development. As such, this statement must be read in association with the other supporting documents to the application.

2. The Proposed Development

- 2.1 The Application Site extends to some 10.05 hectares (ha). The Application Site is bounded by railway land to the north, east and west with the southern edge being defined by Rollins Street and part of Surrey Canal Road and comprises Millwall FC Stadium and employment units situated on Bolina Road, Stockholm Road, Surrey Canal Road and Rollins Street.

- 2.2 The Site also incorporates the planned East London Line Phase 2 Extension from Dalston Junction to West Croydon.
- 2.3 The Proposed Development seeks approval for a highly sustainable, mixed use development to comprise up to 250,000 square metres (sq m) of development floorspace (gross external area (GEA)) on the Application Site.
- 2.4 This quantum of Proposed Development floorspace is split by land use, as follows:
- A1/A2 Retail: up to 3,600 sq m;
 - A3-A4: Cafes/Restaurants and Drinking Establishments up to 3,500sq m;
 - A5 Hot Food Takeaways: up to 300 sq m;
 - B1 Business: 10,000 sq m - 15,000 sq m;
 - C1 Hotels: up to 15,000 sq m;
 - C3 Residential: 150,000 sq m – 200,000 sq m (up to 2,500 units);
 - D1 Community: 400 sq m - 10,000 sq m; and
 - D2 Leisure and Entertainment: 4,120 sq m up to 15,800 sq m;
- 2.5 The maximum total of the floorspace by land use as set out above is greater than the stated quantum of total development floorspace proposed (maximum 250,000 sq m). This is in order to allow flexibility in the delivery of the Proposed Development as it comes forward over time.
- 2.6 This supporting PPS4 Compliance Statement considers only those elements of the application defined as main town centre uses with paragraph 7 of PPS4, Planning for Sustainable Economic Growth (December 2009).
- 2.7 The Development Specifications Document confirms that the maximum retail unit size will be 1,000 sq m of floorspace GEA. The retail element is therefore likely to comprise only a local “*top-up*” shopping development. It is not the intention to promote any form of major retail development on the Site.
- 2.8 In addition, to the local retail element a hotel is proposed which is intended to provide up to 150 rooms and which is expected to be within the budget-mid range. Conferencing facilities will also be included.
- 2.9 A collection of D1 uses is proposed potentially to comprise a Multi-faith religious centre and a children’s nursery/crèche. Various other leisure and entertainment uses are also proposed. Additionally, a variety of D2 uses are also proposed, which could include, a cricket centre;

basket ball facilities; leisure centre with swimming pool and day spa, gymnasium, table tennis facilities; boxing and weight lifting; climbing wall and indoor football pitches.

3. Planning Policy Context

3.1 This Section sets out an overview of national town centre uses policy and development plan guidance which forms the background to the policy considerations of the Proposed Development.

NATIONAL PLANNING GUIDANCE

Planning Policy Statement 1: Delivering Sustainable Development (February 2005)

3.2 The key principles and objectives of the planning system are set out within this policy statement.

3.3 Good planning is a positive and practical process, operating in the public interest through a system of plan preparation and control over the development and use of land (paragraph 2).

3.4 Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:

- Making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
- Contributing to sustainable economic developments;
- Protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- Ensuring high quality development through good and inclusive design and the efficient use of resources; and
- Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community (paragraph 5).

3.5 In order to promote sustainable economic development, planning authorities are advised to, inter alia:

- recognise that economic development can deliver environmental and social benefits;
- ensure that suitable locations are available for retail developments so that the economy can prosper;
- provide for improved productivity, choice and competition; and
- actively promote and facilitate good quality development which is sustainable and consistent with their plans (paragraph 23).

Planning Policy Statement 4: Planning For Sustainable Economic Growth (December 2009)

3.6 Planning Policy Statement 4: Sustainable Economic Growth (PPS4) was published on 29th December 2009. This document sets out Government guidance on economic development which includes retail development.

3.7 To help achieve sustainable economic growth the Government's objectives for planning are to:

- Build prosperous communities by improving the economic performance of cities, towns, regions, sub-regions and local areas, both urban and rural;
- Reduce the gap in economic growth between regions, promoting regeneration and tackling deprivation;
- Deliver more sustainable patterns of development, reduce the need to travel, especially by car and respond to climate change;
- Promote the vitality and viability of town and other centres as important places for communities to include; - new economic growth and development of main town centre uses to be focused in existing centres; - ensuring competition between retailers and enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres (Paragraph 10).

3.8 Policy EC4.1 confirms that local planning authorities should proactively plan to promote competitive town centre environments and provide choice by, inter alia, supporting shops and services.

3.9 Policy EC10.1 confirms that local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably.

3.10 Policy EC10.2 confirms that all planning applications for economic development should be assessed against the following impact considerations:

- Whether the proposal has been planned over the lifetime of the development to limit carbon dioxide emissions and minimise vulnerability and provide resilience to climate change;
- The accessibility of the proposal by choice and means of transport;
- Whether the proposals gives a high quality and inclusive design;
- The impact on economic and physical regeneration in the area including the impact on deprived areas and social inclusion objectives;
- The impact on local employment.

- 3.11 Policy EC11 relates to determining planning applications for economic development (other than main town centre uses) not in accordance with an up to date development plan. This confirms that local authorities should take a full account, inter alia, of any longer term benefits as well as the costs for development, such as job creation or improved productivity including new wider benefits to national, regional or local economies.
- 3.12 Paragraph EC14.3 confirms a sequential assessment is required for planning applications for main town centre uses that are not in an existing centre and not in accordance with an up to date development plan.
- 3.13 Paragraph EC14.4 confirms an assessment of impacts is necessary to support planning applications for retail and leisure developments which are not in an existing centre and not in accordance with an up to date development plan if they are over 2,500 sq m gross. In addition, smaller proposals should also be supported by an assessment of impacts where they are out of centre and not in accordance with the development plan if they would be likely to have significant impacts on other centres.
- 3.14 Policy EC15.1 confirms that in considering sequential assessments local planning authorities should;
- a. Ensure that sites are assessed for their availability, suitability and viability;
 - b. Ensure that all in-centre options have been thoroughly assessed for less central sites considered;
 - c. Ensure that where it has been demonstrated that there are no town centre sites to accommodate the proposed development preferences given to edge of centre locations which are well connected to the centre by means of easy pedestrian access and;
 - d. Ensure that in considering sites in or on the edge of existing centres developers and operators have demonstrated flexibility in terms of
 - e. Scale, format, car parking provision and scope for disaggregating specific parts of the retail and leisure development.
- 3.15 Policy EC16 relates to planning applications for main town centre uses that are not in a centre and not in accordance with an up to date development plan. Paragraph EC16.1 confirms that such proposals should be assessed against the following impacts on centres:
- The impact on existing committed and planned public and private investment in a centre or centres in the catchment area;

- The impact on town centre vitality and viability including local consumer choice and the range and quality of the comparison and convenience offer;
- The impact of the proposal on allocated sites outside town centres being developed in accordance with the development plan;
- In the context of a retail or leisure proposal, the impact on in-centre trade/turnover and on trade in the wider area;
- If located in or on the edge of a town centre where the proposals are of an appropriate scale in relation to the size of the centre in its role in the hierarchy centres;
- Any locally important impacts on the centres.

3.16 Subsequent Policy EC17 confirms in the consideration of planning applications for the development of main town centre uses not in an existing centre that these should be refused where, the applicant has not demonstrated compliance with the requirements of the sequential approach; or there is clear evidence that the proposal is likely to lead to significant adverse impacts.

DEVELOPMENT PLAN POLICY

3.17 The statutory development plan covering the Application Site comprises The London Plan (Consolidated with Alterations since 2004) adopted February 2008 and the saved policies of the Lewisham Unitary Development Plan (UDP) adopted July 2004.

3.18 Consideration has also been given to the emerging policy position as outlined in the Draft Replacement London Plan (October 2009) which is anticipated to replace the London Plan in 2011, and the London Borough of Lewisham's LDF Core Strategy Submission Document (October 2010)

3.19 The Policy review below considers only those policies relevant to main town centre uses.

The London Plan (Consolidated with Alterations since 2004) (February 2008)

3.20 Policy 3A.18 seeks the enhancement of social infrastructure and community facilities, ensuring needs are met where possible.

3.21 Policy 3D.1 (Supporting Town Centres) confirms that the Mayor will and the Boroughs should enhance access to goods and services and strengthen the wider role of town centres including development plan document (DPD) policies to, inter alia;

- Encourage retail, leisure and other related uses in town centres;
- Enhance the competitiveness and quality of retail and other consumer services in town centres;
- Support a wide role for town centres as locations for leisure and cultural activities as well as business and housing and their key role in developing a sense of place and identity for sustainable local communities;
- Encourage net additions to town centre capacity where appropriate to their role in the overall network.

3.22 Policy 3D.2 (Town Centre Development) confirms that DPD Policies should, assess the need and capacity for additional retail floorspace, relate the scale of retail, commercial and leisure development to the size and role of the centre, if no town centre sites are available ensure provision be made on the edge of centres in the network and encourage additional comparison goods capacity in larger town centres and convenience goods capacity in smaller centres of appropriate scale in order to secure a sustainable pattern of retail provision.

3.23 Policy 3D.3 (Maintaining and Improving Retail Facilities) confirms that Boroughs should undertake a variety of initiatives to support and improve retail facilities.

The London Borough of Lewisham Unitary Development Plan Adopted July 2004 (Saved Policies)

3.24 The Lewisham Unitary Development Plan was adopted in July 2004. Following the Planning and Compulsory Purchase Act (2004), some policies contained within the UDP were not “saved” beyond September 2007. Only the relevant saved policies are referred to within this statement.

3.25 Strategic Policy STR.STC2 (Location of Retail) confirms that town centres are the preferred location for large scale retail development and proposals for other locations will be critically evaluated and subject to the sequential test and demonstrable need for the proposal.

3.26 Policy STR.LCE2 (Leisure and Education Facilities) seeks to ensure that leisure, community, arts, cultural, entertainment, sports, health care, child care, protective and public service and education facilities are located in appropriate places that contribute to sustainability objectives and provide easy access for users.

3.27 Policy STC1 (The Shopping Hierarchy) confirms the Council will seek to maintain where necessary and improve the function, character, vitality and viability of the established shopping hierarchy within the Borough. The Policy sets out the shopping hierarchy within the

Borough with Lewisham and Catford being Major Town Centres with New Cross being a District Town Centre and New Cross Gate being a Neighbourhood or Local Centre.

- 3.28 Policy STC2 (Location of New Stores (Sequential Test)) is a criteria based policy relating to the location of new stores. This confirms the Council will grant planning permission for additional retail use in the Major District Town Centres as defined on the proposals map but that if no suitable, viable or available sites are present in these locations then edge of centre sites should be considered, followed only then by out of centre sites in locations that are or can be made accessible by choice and means of transport.
- 3.29 Policy STC2 confirms that proposals for substantial retail provision on the edge or outside of these centres will only be considered if various criteria is satisfied. It is confirmed that for guidance developments of 1,000 sq m gross floorspace or more will normally be considered “*substantial*”. The relevant criteria principally requires satisfaction that there is a quantitative and qualitative need for the proposal (however this has now been superseded by PPS4 which no longer requires a need to be demonstrated), that there are no other sites available in accordance with the sequential test, that the proposal either individually or cumulatively would not demonstrably harm the vitality and viability of an existing shopping centre and is sited so as to reduce the number and length of car journeys and conserve not only car journeys but also those on foot, bicycle or using public transport and is not on land allocated for employment purposes on the Proposals Map and for which a demand can be established.
- 3.30 Policy STC9 (Restaurants, A3 uses and Takeaway Hot Food Shops) confirms such uses will be granted permission subject to satisfying various criteria, principally relating to issues relating to parking, traffic generation and amenity.
- 3.31 Policy SCT12 (Mixed Use Development) confirms the Council will welcome development proposals involving appropriate mixed use schemes in, inter alia, appropriate locations that are well served by public transport.
- 3.32 Policy STC13 (Leisure Facilities) and Policy LCE1 (Location of New and Improved Leisure, Community and Education Facilities) requires that large leisure developments should be located in the major or district town centres or on a site listed as suitable for this purpose on the proposals map. If such sites are not available then an edge of centre site may be considered. When none of these are available, out of centre sites may be considered in appropriate locations well served by public transport. It is confirmed that facilities serving local neighbourhoods or special needs groups should be located preferably within a district centre but a local centre may be acceptable. Those facilities which are appropriately located in residential areas or exceptionally because other sites are not available should meet criteria

confirming that there will be no adverse impact on local shops or services, no adverse impact on residential amenity and good access by public transport.

- 3.33 Policy LCE5 (Day Nursery and Child Care Facilities) confirms the Council will seek to ensure the number of day nurseries and facilities for the care, recreation and education of children is adequate.

LOCAL DEVELOPMENT FRAMEWORK

- 3.34 LB Lewisham is currently preparing its Local Development Framework (LDF) in line with the provisions of the Planning and Compulsory Purchase Act 2004. When adopted, the LDF will replace the UDP and will cover the period through to 2026.

- 3.35 Core Strategy Policy 6 sets out the retail hierarchy which confirms Lewisham and Catford as Major Town Centres.

- 3.36 LB Lewisham submitted its Core Strategy to the Secretary of State in October 2010 and the Examination in Public is scheduled to take place in February 2011. The Core Strategy constitutes the overarching planning policy document for the emerging Local Development Framework (LDF) and identifies the Spatial Vision and Strategic Objectives for the development within the London Borough of Lewisham for the period up to 2026. The Core Strategy is considered to carry significant weight in the determination of new applications.

- 3.37 Policy SP1 considers spatial development and sets out the hierarchy for the location of new development across the borough. Specifically, it identifies Regeneration and Growth Areas covering key localities within Lewisham, Catford, Deptford and New Cross/New Cross Gate, where the majority of the borough's new housing, retail and employment uses will be focused.

- 3.38 Within the Core Strategy, Strategic Site Allocation 3 (SSA3) relates to Surrey Canal. This is allocated for a sustainable, mixed use development. Policy SSA3 requires the provision of retail uses (A1-A2) to serve local needs that do not adversely impact upon existing town centres, as well as a mix of restaurant, food and drink uses to serve the site and immediate neighbourhood.

OTHER EMERGING PLANNING POLICY

- 3.39 In October 2009 the Mayor of London published a consultation draft of a review of The London Plan entitled The London Plan Spatial Development Strategy for Greater London (October 2009).

- 3.40 The replacement of The London Plan gives consideration to supporting retail, town centres and town centre development at paragraphs 141 and 142. It is confirmed, the availability and accessibility of local shops is an important aspects of ensuring “*life time neighbourhoods*” (paragraph 142).
- 3.41 It is confirmed that the Mayor will support a successful and diverse retail sector across London and will encourage joint work between public and private sectors to identify and bring forward new development opportunities to meet identified needs in appropriate locations.

Conclusions On Planning Policy

- 3.42 National planning guidance is permissive of new economic development (Policy EC10.1 – PPS4). The Application Site is the subject of a site specific allocation for a major sustainable, mixed use development within the Lewisham LDF Core Strategy.
- 3.43 The scheme includes up to 3,600 sq m of A1/A2 floorspace, as well as up to 3,500 sq m of A3-A4 floorspace and up to 300 sq m of A5 takeaway use. In addition, the parameters fixed at this stage confirm that retail units will be a maximum of 1,000 sq m in size ensuring that they are of a sufficient size to provide supporting services and facilities for the area without harming the vitality and viability of surrounding town centres.
- 3.44 Accordingly, relevant policies of the adopted local plan, the LDF Core Strategy and national guidance confirms that local retailing and other community facilities are acceptable on the site subject to accordance with those tests within PPS4 as required.

4. Retail Context

4.1 The relevant retail and main town centre use context for the Proposed Development is set within the Lewisham Retail Capacity Study (November 2009) prepared by Nathaniel Litchfield and Partners (NLP) which superseded an earlier 2004 District Wide Retail Study. The 2009 Lewisham Retail Capacity Study (Lewisham RCS) has itself been the subject of updating following publishing of a Supplementary Report to the Lewisham Retail Capacity Study 2009 dated 23rd September 2010.

4.2 The Lewisham RCS was intended to inform the following;

- Assess the existing supply and capacity for additional retail floorspace within the Borough (Convenience and Comparison Goods) and the role played by each of the Major and District Town Centres;
- Assess the potential future role and capacity within existing town centres over the period to 2025;
- Identify potential sequential opportunities to accommodate growth within centres, and outside, if necessary, over the period of 2025;
- Provide a review of the existing retail hierarchy and identify any deficiencies in the existing network together with future development strategies;
- Identify issues and options for the future of Lewisham Town Centre;
- Provide an assessment of, and likely timescale for, individual identified sites to meet the retail need;
- Take account of the floorspace needed to achieve the policy objective of elevating Lewisham Town Centre up the retail hierarchy to a Metropolitan Centre and whether the joining of New Cross and New Cross Gate Centres into one is consistent with the strategy for Lewisham Town Centre and other centres.

4.3 The Lewisham RCS (November 2009) sets out a number of key conclusions. Namely,

- It was recognised there is a need for additional shopping facilities within the Borough to meet projected growth in expenditure. It was considered the minimum objective should be to safeguard the Borough's existing shopping role and market share in the face of increasing competition.
- A surplus convenience expenditure of some £28.06m at 2009 indicates an immediate capacity for some 2,551 sq m net of additional convenience goods floorspace within the Borough. At 2014 the estimated surplus convenience expenditure was suggested to rise to c £60m to support up to 5,406 sq m net of convenience floorspace.
- For the Lewisham North Area (comprising Deptford and New Cross) a deficit in convenience expenditure of some £15.57m was identified at 2009 although this is expected to decrease to some £9.06m at 2014. This deficit arises from the

assumption that the Convoy's Wharf scheme will accommodate a higher level of convenience floorspace than that proposed in an earlier 2005 scheme.

- It was noted that no capacity for additional comparison goods floorspace was identified up to 2014 due to the large amount of comparison floorspace commitments, in particular at Lewisham Gateway, Bell Green and Thurston Road. However, it was noted that it was possible that not all of the committed development will come forward and that this combined with the fact that new comparison floorspace will increase the market share of the Borough could mean there is additional capacity up to 2014. At 2019 it was considered there would be a surplus of £39.62m comparison goods expenditure rising to £181.96m at 2025. It was suggested that a minimum of an additional 20,000 sq m of comparison goods floorspace is required to satisfy the Metropolitan Centre status for Lewisham Town Centre

- 4.4 Table 6.3 of the Lewisham RCS sets out the summary of available convenience and comparison capacity concluded as a finding of the study.

Table 1 Summary Floorspace Capacity Table (November 2009)

	2014	2019	2025
Convenience Goods			
Convenience Expenditure (£m)	60.00	97.38	135.94
Floorspace Capacity net	5,406	8,643	11,851
Floorspace Capacity gross	7,723	12,347	16,980
Capacity of identified sites gross	6,600	11,816	11,816
Residual convenience capacity gross	1,123	531	5,164
Comparison Goods			
Comparison Expenditure (£m)	-30.83	63.36	214.24
Floorspace Capacity net	-6,457	12,018	36,104
Floorspace Capacity gross	-9,224	17,169	51,577
Capacity of identified site gross	4,100	28,680	28,680
Residual comparison capacity gross	-13,324	-11,511	22,897
Vacant Units			
Capacity of vacant units gross	5,000	5,000	5,000

- 4.5 Most recently, Nathaniel Litchfield and Partners (NLP) published a "Supplemental Report to Lewisham Retail Capacity Study 2009" dated 23 September 2010. This Supplementary Report sought to provide:

- Guidance on the continuing of 2009 Retail Study in the context of both advice on development plan preparation published within PPS4 (December 2009) as well as any changes in the base, data/other assumptions;
- An updated analysis of the land use as a recommendation on the appropriate Primary and Secondary Core.

In respect to the viability of the 2009 data it was concluded that this remains up to date, and valid and robust. The study also suggested that 1,000 sq m should be the relevant threshold for the scrutiny of retail proposals.

5. Sequential Assessment

- 5.1 The sequential approach is the Government's "town centres first" policy (see Policy EC15 of PPS4) which any edge of centre or out of centre proposal for a main town centre use(s) needs to address.
- 5.2 Proposal SSA3 (Surrey Canal) of the Lewisham Core Strategy confirms that the Surrey Canal Road Triangle site is allocated for a sustainable, mixed use development and that it should provide, a new "destination development" capitalising on the opportunities presented by Millwall Stadium and provide retail uses to serve local needs and to provide a mix of restaurant, food and drink uses to serve the site and the immediate neighbourhood.
- 5.3 In assessing the suitability of alternative sites, PPS4 requires sequentially preferable sites to be available, suitable and viable.
- 5.4 Critically, in undertaking such a sequential assessment, it is necessary to consider the area in which it is appropriate to search for alternative sites. PPS4 confirms that the relevant centres in which to search for sites will depend on the overall strategy set out within the development plan, the nature and scale of the development and the catchment that the Proposed Development seeks to serve.
- 5.5 We set out below the methodology applied in respect to the various main town centre uses which form part of the Proposed Development.

Methodology

- 5.6 In undertaking any sequential assessment each site identified for consideration has been assessed against a variety of considerations in terms of the size of the site, its character and suitability in planning terms as outlined below.

Site and Surroundings

- 5.7 Establishing the character of the site and surrounding area is an important consideration when assessing the suitability of any site in planning terms.

ii) Physical Capacity

- 5.8 The physical size of a site is critical when considering whether or not it is capable of accommodating the Proposed Development. Although operators need to be flexible in terms of the format and size of any new store, it is not reasonable to change this to the extent that it can no longer perform its intended function or meet the identified need.

iii) Planning Suitability

5.9 This is determined having regard to a broad range of factors including:-

- Relationship to the town centre – the proximity of the site will affect the propensity for linked visits between it and any nearby town centre. The guidance advises that the site should be within “*easy walking distance*”, however, it is also important to take into account other factors such as:-
- Ease/difficulty of walk – actual distance, gradient and surface quality;
- Pleasantness of the walk – potential crime, physical safety, cleanliness, environment level of pollution etc.;
- The size/quality of the town centre and the proposed retail facility. The better the range and choice of facilities offered in any town centre, the greater the ability for it to draw customers from an edge of centre site. Similar considerations apply in reverse.
- Accessibility – consideration of whether the site is accessible on foot, by public transport and by car, as well as for ease of service vehicles undertaking deliveries. The choice of mode of access will in practice be determined by a number of factors, including convenience, safety, time involved, environment etc., which are all factors which determine the attractiveness of that option.
- Access and traffic impact the development of any retail development can contribute directly and indirectly to traffic impact, both in terms of effect on adjacent roads and impact on the amenity of neighbouring uses as a result of increased traffic.
- Land use – the existing use of the site and the consequence of it’s loss and any proposed future use as indicated by current planning permissions or development plan allocations.
- Retail location – the suitability of the site in retail terms. Whilst of particular interest to the retail operators, it is also a relevant planning consideration in the context of retail proposals. The retail suitability of the location in terms of prominence will influence the success of a proposal to perform the function it is intended to serve and the likelihood of any planning permission being implemented. It is undesirable in planning terms to grant planning permissions where these will remain unimplemented thus making future decisions for alternative retail developments more difficult due to uncertainties as to whether or not past permissions will in fact be implemented.
- Compatibility with surrounding uses – the possible impact of retail development on surrounding uses, and particularly any impact on residential amenity in terms of its physical structure, built design, signage, as well as the impact of its operation – noise, lighting, smells etc.

iv) Site Availability

5.10 For a site to represent a practical opportunity for development it needs to be available either immediately or within the foreseeable future. The availability of the site will depend upon

various factors such as the number of ownerships involved as well as the nature of those ownerships. Sites must be likely to become available within a reasonable period of time (determined on the merits of a particular case but usually considered to be five years) to qualify for consideration under the sequential approach.

v) Commercial Feasibility

- 5.11 For a site to be practical, it needs to be commercially viable. This will be determined by the cost of acquiring the site, site preparation, building costs and the rate of return sought by the developer other factors such as prominence will also be relevant.

Scope for Disaggregation

- 5.12 In giving examination to the sequential approach to site selection consideration must be given as to whether it is possible to disaggregate the floorspace.
- 5.13 Policy EC15.1D (iv) of PPS4 confirms that in considering sequential assessments local planning authorities should, give consideration to the scope for disaggregating specific parts of a retail or leisure development, including those which are part of a group of retail or leisure units onto separate, sequentially preferable sites. However, it is confirmed that local planning authorities should not seek the arbitrary/sub-division of proposals.
- 5.14 PPS4 at paragraph EC15.2 also confirms that account should be taken of any genuine difficulties which are likely to occur in operating a business from a sequentially preferable site. For example, a single retailer should not be expected to split their proposal up into separate sites where flexibility in terms of scale, format, car parking provision and scope for disaggregation has been demonstrated.
- 5.15 On the basis that the Proposed Development is intended to meet the aspirations of LB Lewisham for the regeneration of the Surrey Canal area as detailed within SSA3 of the LDF Core Strategy, it would not compliment either Renewal's or LB Lewisham's strategy for the regeneration of Surrey Canal if the above elements were disaggregated or located in any alternative location other than Surrey Canal itself.
- 5.16 Disaggregation of the proposed main town uses is not appropriate in respect to the Proposed Development given it is a major, sustainable, mixed use development to include a variety of "destination" and local neighbourhood uses in accordance with the requirements of SSA3 of the LDF Core Strategy. To disaggregate the various individual uses proposed to other locations within the Borough and other centres would dissipate the collective regeneration effect of the Proposed Development. Such an approach would have the effect of reducing the

significant linkage between the various uses which form the Proposed Development, thereby reducing scheme's overall sustainability.

- 5.17 The various uses forming the Proposed Development have deliberately been formulated to provide a wide mix of uses to maximise the ability for "linked trips" by residents/visitors. In particular, there is significant synergy between the employment floorspace and the new residential uses, between the community and sporting facilities and the new residential and employment floorspace and, in terms of the local neighbourhood shopping proposed and users of the community and sports facilities and on employees of the proposed office floor space. To remove any one of these elements off-site to an alternative occasion would reduce the potential linkages between the various elements thereby, reducing the sustainability of the proposal.
- 5.18 Disaggregation of the Proposed Development would therefore be harmful to LB Lewisham's regeneration aspirations.

Consideration of Alternative Sites

- 5.19 The alternative sites considered below arise from a review of relevant planning policy documents including the Lewisham RCS (November 2009) and the subsequent September 2010 Addendum and the Southwark Retail Study (February 2009) as well as the adopted Lewisham Unitary Development Plan and Southwark Unitary Development Plan. Notably, an assessment of potential retail development sites was undertaken as part of the Lewisham RCS (November 2009), a number of potential development sites were identified which are included within the list below.
- 5.20 Set out below is the list of the potential development sites taken from the Lewisham RCS 2009.

Site	Potential Scale of Retail Development	Type of Retail Anticipated	Potential Availability
LEWISHAM			
L3 Model Market, Lewisham	Small	Small Comparison Unit	Medium Term
L5 Lewisham Gateway	Large	High Order Comparison	Short to Medium Term
L6a and 6b Thurston Road	Large	Retail (as part of a mixed use development)	Short Term
L9 Land north of	Small	Small convenience/	Short Term

Sundermead (Loampit Vale)		comparison retail as part of a large mixed use scheme	
L11 Tesco Site	Small/medium	Extension of existing foodstore. Convenience/ comparison floorspace	Medium Term
L12a Lee High Road	Small	Small scale retail units	Good
L12b Lee High Road	Small	Medium sized retail unit	Medium Term
Site	Potential Scale of Retail Development	Type of Retail Anticipated	Potential Availability
CATFORD			
C3 Old Market Site	Large	Food and Non Food	Medium/Long term.
DEPTFORD			
D3 Deptford Railway Station, Rose Apple Day Centre and car park	Small	Food/Non Food	Medium Term
NEW CROSS			
NC5 Sainsbury's	Medium	Food/Non Food – extension to existing store	Short/Medium Term
NC6 New Cross Gate Retail Park	Medium/Large	Comparison goods units	Short/Medium Term
LEE GREEN			
LG1 Lee Gate Centre and multi- storey car park	Large	Food/Non Food	Medium/Long term
LG2 Sainsbury's	Medium	Foodstore extension	Medium/Long term

5.21 In undertaking any sequential assessment, PPS4 confirms it is relevant to only examine sites within the catchment area of the proposal and secondly, all sites must be suitable, available and likely to come forwards within a reasonable timeframe. As a consequence of these criteria, none of the above sites are an appropriate location for the development given its

primary aim which is to regenerate and rejuvenate the Surrey Canal area as a response to allocation SSA3 of the LDF Core Strategy.

- 5.22 The retail elements of the Proposed Development are to be a local neighbourhood “*top up*” shopping facility only. As such, these facilities are required to be in the immediate locality of the Application Site in order to serve the 2,500 homes which will form part of the new community. The relevant catchment area for the neighbourhood shopping provision proposed as part of the application is effectively the application site boundary as no other location is suitable to serve the new homes, office floorspace and sporting and community uses proposed. Similarly, in light of the suggested arrangement of the proposed uses on site and the disbursement of residential blocks throughout the Site, even a location in close proximity to the Site boundary would be unsuitable. In order to be accessible to all the proposed residential units a location within the Application Site itself is required.
- 5.23 None of the sites referred to above as potential development sites are within this catchment area. As such, these sites cannot be considered suitable as they are locationally too distant to be suitable to perform a neighbourhood shopping role.
- 5.24 In addition, to the above sites we have also given consideration to other potential sequentially alternative sites. Such sites include the vacant units within the New Cross and New Cross Gate Centres and proposed development sites at Canada Water within LB Southwark, (as proposed within the Canada Water Area Action Plan). However, again as a result of the distant location of these sites from the Application Site none of these vacant units or development sites can be considered suitable to perform a neighbourhood shopping role to serve the new homes, employment floorspace and community and sporting facilities proposed.
- 5.25 The other main town centre uses proposed must be assessed against the sequential approach to site selection as required under PPS4 namely, the proposed office development, the multi-faith religious centre and other leisure facilities, these all form part of the comprehensive regeneration proposals for Surrey Canal as dictated within Policy SSA3 of the Core Strategy LDF. Allocation SSA3 of the LDF requires Surrey Canal to be both a sustainable, “*destination*” and to ensure that any development capitalises on opportunities presented by Millwall Stadium.
- 5.26 In this context, the proposed leisure facilities, office development and the Multi-faith centre all help create the “*critical mass*” required to form a “*destination*” development focussed around Millwall FC Stadium. There is significant synergy between all the various uses including between the proposed restaurant, takeaway and other leisure uses and with the Stadium.

There is also significant synergy between the neighbourhood retailing proposed and the new homes to be provided, and the office floorspace and sports community uses, there is also strong linkage between the sports community uses and the employment floorspace. As such, the wide variety of uses on the Site allows visitors and residents to undertake a top up shopping trip as part of any linkage trip with, the office. The Application Site is therefore an appropriate location for the Proposed Development.

5.27 In addition, the synergy between stadium development and associated retail and leisure uses is well established. There are a significant number of new stadium developments within the UK which are associated with a much larger volume of retail floorspace than currently proposed here. Examples include,

- Fossetts Farm, Southend;
- Madejski Stadium, Reading
- Pride Park, Derby;
- Galpharm Stadium, Huddersfield;
- National Football Stadium, Wembley

Conclusions of Sequential Assessment

5.28 LB Lewisham's aspirations to create a "*destination*" development around Millwall Stadium would not be achieved if, the overall development was disaggregated and the individual uses directed to the Borough's major centres.

5.29 It is therefore concluded that the proposal is suitable and therefore meets the relevant tests sets out in PPS4 on the basis that no other available development site within the Borough which is likely to come forward from a reasonable time frame is suitable.

6. Assessment of Impact

6.1 Following the publication of PPS4 on 29th December 2009, the former “needs” test has been removed and instead the onus is on a wider more holistic impact assessment. As part of this impact assessment the issue of scale is also required to be considered.

6.2 PPS4 confirms that local planning authorities should consider the impact of the development on the centre or centres likely to be affected, taking account of:

- The impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal;
- The likely impact on town centre vitality and viability;
- The impact of the proposal on allocated sites outside town centres being developed in accordance with the development plan;
- In the context of a retail or leisure proposal, the impact of the proposal on in-centre trade/turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to five years from the time the application is made and where applicable on the rural economy;
- If located in or on the edge of the town centre whether the proposal is of an appropriate scale in terms of gross floorspace in relation to the size of the centre and its role in the hierarchy;
- Any locally important impacts on centres under Policy EC3.1.e.

6.3 As such, the new impact test includes a much wider range of impacts both positive and negative to be considered than previously was the case under PPS6. This includes issues such as, job creation, socio-economic benefits, impact on climate change, etc. As such, other supporting documents to this application particularly the Regeneration Report provided by Hunt Dobson Stringer must also be considered within the new wider consideration of impact.

6.4 We now consider each element of the Impact test in turn.

Criterion 1: The Impact On Existing, Committed And Planned Public And Private Investment In A Centre Or Centres In The Catchment Area Of The Proposal

- 6.5 The impact of any proposal on existing, committed and planned public and private investment can be both positive and negative. The Proposed Development is a response by Renewal to allocation SSA3 contained within the LB Lewisham LDF Core Strategy seeking a “*destination*” mixed used development at Surrey Canal. In this respect, the Proposed Development provides significant positive impacts on planned investment through the regeneration of Surrey Canal. The comprehensive development of the Site proposes significant employment, residential and community sports focused uses all of which offer significant benefits to LB Lewisham and the local area. The overall regenerative benefits of the application are contained within other supporting documents principally, the Planning Statement and Regeneration Report.
- 6.6 Notwithstanding the above, consideration has been given of the potential impact of the proposal in cumulative terms on investment within the major centres in Lewisham, principally New Cross and New Cross Gate and the proposals by LB Lewisham to elevate Lewisham Town Centre to Metropolitan status. In addition, consideration has also been given to any potential impact on the proposals by LB Southwark to regenerate and invest in Canada Water as detailed within the Canada Water Area Action Plan (January 2010).
- 6.7 LB Lewisham’s strategy for enhancing the status of Lewisham is principally through improving its comparison goods shopping offer. The Lewisham RSC 2009 (Paragraph 7.13) confirms that Lewisham does not provide the quantity and quality of retailers to function as the Metropolitan Centre. In particular, NLP note that the national MHE Retail Rankings (2008), which is based on national multiple representation, indicates that Lewisham is ranked significantly lower than other Metropolitan Centres in the sub region such as Croydon and Bromley and that there is a need to attract additional national multiples if Metropolitan Centre status is to be achieved.
- 6.8 The key scheme in achieving this is the Lewisham Gateway Scheme which has now obtained outline planning permission for a development of circa 12,000 sq m gross of retail floorspace in addition to office, residential, education and leisure uses. This proposal will significantly enhance an underused area of Lewisham Town Centre and provide good quality modern retail floorspace which should attract new national multiples Lewisham and therefore significantly increase the town’s retail offer.
- 6.9 The Proposed Development is a highly sustainable “*sports related*” development focussed around Millwall FC Stadium. It is not considered this will adversely affect LB Lambeth’s aspirations regarding the regeneration of Lewisham. The proposals at Lewisham Gateway are located within Lewisham Town Centre and are focused on improving Lewisham Town Centre and seeking to elevate its status to a Metropolitan Centre status. Juxtaposed to this, the proposals for Surrey Canal are specific to the Surrey Canal area. In particular, the retail

element is significantly smaller (approximately only 30% of the floorspace figure for the Lewisham Gateway Scheme) and is of an entirely different function and role and quantum to the comparison goods offer of the retail proposals at Lewisham Gateway being designed to perform a local shopping role only.

- 6.10 In respect to the other proposed uses such as office and education/leisure uses, these elements are partly specific responses to the existing UDP employment allocation of the Site which is a recognised employment location and, through a need to house a significant number of local churches which are currently residing in locations with a non-conforming planning permission (usually existing employment floorspace). As such, the Proposed Development is not based upon the relocation of Town Centre Occupiers.
- 6.11 The proposals by LB Southwark in respect to Canada Water are significant and to seek to regenerate the area around Canada Water and the Surrey Quays Shopping Centre. LB Southwark published the Canada Water Area Action Plan (AAP) in January 2010 which confirms LB Southwark's aspiration to strengthen Canada Water's role as a shopping destination expanding the amount of retail space by circa 35,000 sq m providing a more diverse range of shops than at present and including a new department store. In addition, at least 2,500 high quality new homes will be provided in a generally mixed use development. Office development will provide space for local occupiers and together with the proposed retail development will generate around circa 2,000 new jobs.
- 6.12 In the context of the retail element, the amount of retail proposed at Canada Water is considerably greater than that which forms part of the Proposed Development. Indeed, the 3,600 sq m of A1/A2 floorspace promoted as part of the Proposed Development is only circa 10% of the circa 35,000 sq m of retail floorspace proposed at Canada Water.
- 6.13 Overall, the proposals for Canada Water are considerably larger than that proposed for Surrey Canal and the centre has its own distinct catchment. Accordingly, it is not considered that the significant proposals for major new national multiples (including a department store) at Canada Water are likely to be impacted upon by the local neighbourhood shopping facilities included as part of the Proposed Development.

Criterion 2 : The Likely Impact On Town Centre Vitality And Viability

- 6.14 Within LB Lewisham, the nearest centres to the Application Site are New Cross and New Cross Gate. In addition, consideration has also been given to the impact of the proposal on the vitality and viability of Canada Water which is located within LB Southwark.

- 6.15 The Lewisham RSC (November 2009) provides an up to date health check and audit of New Cross and New Cross Gate. The conclusions within the Lewisham RSC are that the strength of the centre is its convenience A1 service and A3-A5 service representation which is above the national average. In particular, the level of convenience retail was some 15.6% compared to a national average of 9.5%. It was the case that the comparison retail figure was significantly less than the national average, being 19% compared to a national average of 44%. The convenience anchor for the centre is a large Sainsbury's Food Store on New Cross Road with most other units in the sector being independent.
- 6.16 It is noted that the centre is dominated by independent retailers with few national retailers present.
- 6.17 In terms of vacancy rates, the Lewisham RSC Study indicates a vacancy level of 8.2% which was notably below the national average (at the time being 11.4%). Furthermore, within the Lewisham RCS the current number of vacant units (12) was noted to be the lowest level recorded over 1999 to 2009 period and significantly less than the level at 2008 (21).
- 6.18 It was noted that New Cross is a highly accessible centre being served by two railway stations (New Cross and New Cross Gate) and that in terms of environmental quality that the centre contained some historic buildings and occupied units which are generally of reasonable quality. However, the busy nature of New Cross Road does detract from the local environment and some poor quality vacant units in the centre.
- 6.19 In terms of the particular weaknesses of the centre, there was noted to be:
- Comparison retail provision in the centre is well below the national average;
 - The key anchor tenant Sainsburys is somewhat divorced from the rest of the town centre;
 - Low proportion of national multiple representation.
- 6.20 Under "*Threats*" it was noticed that these comprised:
- Continued focus of the centre on providing for the student population at expensive facilities of other local residents;
 - Increased competition from other centres nearby;
 - No improvement to linkages between retailers in New Cross and the Sainsbury's store/Deptford District Town Centre;
 - Continued lack of key national multiple retailers will reduce the attractiveness of the centre;

- Decline in spending associated with the credit crunch–recession.

6.21 The proposals for Surrey Canal were well advanced at the time of the publication of Lewisham RSC. The proposals for Surrey Canal have not identified as a significant threat to the New Cross District Town Centre. Furthermore, in respect to the noted weaknesses of the centre, these relate to the comparison offer of New Cross District Centre and, the low proportion of national multiples and the relationship of the anchor store Sainsbury's to the rest of the town centre. As such, the provision of local independent retailers offering top up shopping facilities as part of the Proposed Development is not of a type and nature which is directly in conflict with these identified weaknesses within the Lewisham RSC. Accordingly, the impact of the proposal on New Cross and New Cross Gate centres is not considered to be significant. The quantitative assessment contained at **Appendix One** illustrates that there is sufficient growth in expenditure to fully cover the turnover of the proposed retail floorspace. This is discussed in more detail below.

6.22 In respect to Surrey Quays Shopping Centre, the local nature of the shopping provision proposed ensures it is not of sufficient size to have any impact either on the centre itself or on the proposals by LB Southwark to revitalise and regenerate the Canada Water area. The Surrey Quays Shopping Centre is anchored by a number of national multiples including a large Tesco Extra store and Decathlon. The existing centre performs an entirely different shopping role to the local shopping facilities promoted as part of the Proposed Development. The Surrey Quays Shopping Centre has also recently benefited from the opening of the London Overground Extension which has significantly enhanced access to the shopping centre from South East London and Hackney/Dalston.

6.23 The Southwark Retail Study (February 2009) confirms Surrey Quays Shopping Centre to be vibrant with high levels of activity and to be vital and viable. This success stems from the centre's accessibility, ease of parking and large floorplate uses. It is not the case that Surrey Quays Shopping Centre is at all vulnerable to any impact from the local shopping floorspace included as part of the Proposed Development.

6.24 In respect to other elements of the Proposed development, it is not considered that the potential Multi-faith centre will adversely impact upon town centre vitality and viability. As explained, Renewal were aware of a demand for this use very early in the masterplan process. Renewal manages and lets all of its own estate in-house and receives on average, on a weekly basis, two to three enquiries for various industrial units for use as churches. Renewal currently has four churches as tenants that occupy units within the Surrey Canal Site.

- 6.25 Renewal is therefore aware of a demonstrable demand by such religious organisations for high quality, bespoke floorspace as a result of a current willingness by such religious organisations to take on such unsuitable accommodation in order to provide their services due to a non-existent supply of purpose built suitable space.
- 6.26 There are, in the region of 70 churches within close proximity of the Site. Many of which occupy their sites on an illegal basis and have been subject to planning enforcement action. The LB Lewisham Employment Land Study Final Report (November 2008) prepared by Roger Tym & Partners estimated that the amount of space occupied by churches across Lewisham was in excess of 67,820 sq m.
- 6.27 Renewal have discounted use of the building as a “*mega church*” but rather propose the unique concept of a Multi-faith centre comprising a managed facility with self contained units of various sizes that would offer various churches the home they are seeking with the benefit of shared ancillary spaces such as IT suites, classrooms and a larger communal hall that would be available to both occupiers and outside organisations on a booked basis and co-ordinated through a centre management team. The Proposed Development is thus intended to meet the current occupational needs of the small and medium size religious organisations that presently occupy industrial space within the immediate area. It is not intended that such uses will relocate from existing centres but rather from the immediate surrounding area. As such, the proposed multi-faith centre is not considered to have any adverse effect on town centre vitality and viability.

Criterion 3: The Impact Of The Proposal On Allocated Sites Outside Town Centres Being Developed In Accordance With The Development Plan

- 6.28 Criterion 3 relates to allocated sites outside of town centres. A review within relevant development plan documents of allocations for retail/main town centre uses confirms that such allocations are almost exclusively located within the defines of existing centres within Lewisham. As such, it is not considered there are any outstanding allocations within the adopted development plan which may be affected by the Proposed Development.
- 6.29 In the context of the Allocation for Surrey Canal itself it is allocated for a sustainable mixed use development. (Allocation SSA3). In specific reference to the proposed neighbourhood shopping, a demonstration that sufficient expenditure exists to support the proposed floorspace is set out below and is detailed at length within **Appendix One**. This demonstrates that the proposed local retail floorspace is commercially viable and that any concerns the proposed retail floorspace may not be taken up and therefore remain vacant are unfounded. The significant synergy which exists between the different uses proposed such as the local

shopping and the employment uses and the local shopping and the sporting and community uses means that in addition to the local residents present there is also a significant number of users and visitors to the Proposed Development to support the local needs shopping floorspace.

Criterion 4: The Impact Of The Proposal On In-Centre Trade/Turnover And On Trade In The Wider Area

- 6.30 Following the publication of PPS4 on 29th December 2009 there is no longer a requirement for an applicant to undertake a separate analysis of available expenditure capacity to support a non-central proposal. However, an assessment of the impact of the proposal in terms of available expenditure capacity within the local area should still be considered.
- 6.31 Criterion 4 relates to in-centre trade/turnover. As such, this criterion relates only to the retail elements currently proposed. **Appendix One** is a technical quantitative assessment relating to the proposed retail floorspace. This provides details of the proposed net retail floor area, its estimated turnover and the level of available expenditure. In the quantitative assessment contained at **Appendix One** the relevant base assumptions and parameters from the Lewisham RSC have been utilised to maintain consistency.
- 6.32 **Appendix One** illustrates that there is sufficient capacity from available expenditure arising from the new housing proposed to support the new local shopping provision. In addition, it is suggested that some 20% of the new retail floorspace turnover will be from outside the Surrey Canal Community. Usually, an allowance of circa 10% might be provided for inflow. However, 20% is appropriate in this instance as the catchment area has been taken to be defined by the extent of the Application Site. Furthermore, the proposed local provision is to be developed around the Millwall FC Stadium which experiences significant visitor numbers coupled with the significant new office and multi-faith elements proposed which will also provide a ready market of customers for the new proposal.
- 6.33 As a consequence of the very local nature of the shopping provision proposed, it is not considered that the proposal will have any adverse impact on in-centre trade/turnover or trade within the wider area. Although New Cross Gate and New Cross Centres principally comprise local independents, these are considered to be sufficiently distant from Surrey Canal not to be affected by the new local shopping provision proposed given the available expenditure as shown within **Appendix One**. As such, it is not considered the Proposed Development will have any adverse impact on in-centre trade/turnover or trade within the wider area.

Criterion 5: Test of Scale

- 6.34 PPS4 requires that consideration is given in respect of edge or out of centre proposals in terms of whether the proposal is of an appropriate scale of development in respect of the size and the role and function of the centre where it is located.
- 6.35 The Proposed Development responds to allocation SSA3 within the LB Lewisham Core Strategy LDF. The retail uses proposed are to serve “*local*” needs as well as the proposed mix of restaurant, food and drink uses. It is thus considered that the Proposed Development responds positively to the requirements of allocation SSA3. On this basis, it is not considered the Proposed Development is out of scale.

7. Conclusions

- 7.1 This statement has been produced on behalf of Renewal New Bermondsey Two Ltd (Renewal) to support an outline planning application for a highly sustainable major mixed use sports focused, development on land known as “Surrey Canal” .
- 7.2 The submitted planning application extends to some 10.05 hectares of previously developed land and proposes development of up to 250,000 sq m of mixed use development on land incorporating Millwall FC Stadium. The Site is allocated within the proposed Lewisham/Catford and New Cross Opportunity Area designation within both the current London Plan and the draft replacement London Plan 2009 and is a proposed Strategic Site Allocation within the Lewisham Local Development Framework (LDF) Core Strategy 2010 and identified as an area for major regeneration under allocation SSA3.
- 7.3 This application is a comprehensive response to this emerging policy framework promoting the significant redevelopment of the Surrey Canal area. The current proposals by Renewal propose a sustainable “*sports focused*” development to bring significant sporting and regenerative benefits to the local area and the Borough of Lewisham as a whole.
- 7.4 National planning guidance is permissive of new economic development (Policy EC10.1 – PPS4) and the Proposed Development is the subject of a site specific allocation for a major mixed use development within the Lewisham Core Strategy LDF (Strategic Site Allocation 3 - SSA3).
- 7.5 It is concluded that the Proposed Development is sequentially acceptable and thus meets the relevant tests sets out in PPS4 on the basis that no other available development site within the Borough which is likely to come forward from a reasonable time frame is suitable as a result of its location.
- 7.6 An assessment of impact has been undertaken using the various criteria as set out within PPS4. An assessment of impact in respect to both the new local shopping provision proposed, the Multi-faith centre, the proposed office uses and other main town centre uses has been undertaken. In all instances it is not considered the Proposed Development will have any unacceptable impact on any centre or floorspace of acknowledged importance.
- 7.7 In conclusion it is therefore considered that the proposal is wholly acceptable in terms of PPS4 criteria.