



Lewisham Local Plan

Response to Inspectors'

Matters, Issues and Questions

Matter 15 – Housing Land Supply

Prepared to inform the Local Plan Examination

October 2024

This version supersedes WS 15/1

LONDON BOROUGH OF LEWISHAM

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Introduction

This paper provides the London Borough of Lewisham's (the Council's) response to the Inspectors' Matters, Issues and Questions Matter 15 Housing Land Supply. These were published on 15 April 2024.

Much of the Council's original response to MIQ Matter 15 (submitted on 7 June 2024 and updated in July - entitled WS 15/1) has been superseded by outputs from the examination Hearing sessions. This document supersedes WS 15/1 in its entirety.

For completeness, this document should be read alongside the following three documents as they form the Council's final position and preferred approach in relation to housing requirement and housing supply:

- **Final Response to Matter 15 Actions Part 2 October 2024,**
- **Final Proposed Source of Supply October 2024** – tabs a to g disaggregate the housing supply into their individual sources of supply. This supersedes LC34. Also, Annex 1 set out at the end of this document supersedes Tables A.1 to A.6 submitted under LC34.
- **Final Proposed Housing Spreadsheet October 2024,** consisting of:

Proposed Housing Trajectory variations (Blue tabs).	#1 Final starting 2425 excl. 450,	Variations depend upon whether the start date is 2024/25 or 2025/26 and whether or not the large windfall site is included.
	#2 Final starting 2425 incl. 450,	
	#3 Final starting 2526 excl. 450,	
	#4 Final starting 2526 incl. 450.	
Final Proposed Five Year Supply (Orange tabs).	#5 Final 5YS starting 2425,	Variations depend upon whether the start date is 2024/25 or 2025/26.
	#6 Final 5YS starting 2526.	
Final Proposed Scenarios to meet the Housing Requirement (Green tabs).	#7 Final scenarios starting 2425,	Variations depend upon whether the start date is 2024/25 or 2025/26 and whether or not the large windfall site is included.
	#8 Final scenarios starting 2526.	

A number of other submitted documents remain relevant. It is highlighted that whilst these documents were factually correct at the point of submission, they may no longer replicate the Final Proposed Housing Spreadsheet October 2024 given that the housing trajectory has evolved and been refined since Submission and during the course of the Hearing sessions. These include:

- PD18 Housing Trajectory – Update to Appendix 6,
- EB15 and EB19 Site Allocations Background Paper,
- Written Statement WS 4/1,
- LC4 Housing Target Background Paper,
- LC10 Additional Housing Supply Topic Paper,
- LC11 Updated Housing Trajectory May 2024,
- LC12 Updated Housing Analysis Addendum,
- LC29 Draft Housing Target Scenarios (Excel),
- LC32 Housing Requirement and Supply Scenario Paper,
- LC33 Housing Calculations Spreadsheet,
- LC41 Response to Actions on Matter 15 – Housing Land Supply.

MATTER 15 – HOUSING LAND SUPPLY

Relevant Policy: HO1

ISSUE – Whether the Plan will provide for a sufficient housing land supply to deliver the planned scale of housing growth over the Plan period and whether a deliverable five-year supply of housing will be available on adoption.

15.1 *Is the Plan consistent with the expectation of NPPF Paragraph 68 for planning policies to identify a sufficient supply of specific, deliverable sites for years 1-5 of the plan period and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15?*

15.1.1 The Council considers that the new Local Plan and the Final Proposed Housing Spreadsheet October 2024 are consistent with NPPF Paragraph 68 and the definition of deliverable and developable land in the NPPF Glossary.

15.1.2 Tables A.1- A.6 in Annex A of this document provide an overview of the robust, up-to-date evidence that demonstrates how the sites within Lewisham’s 5-year housing supply are considered to be deliverable. Namely, that they are available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within 5 years. It is highlighted that Tables A.1- A.6 also provide an assessment, based upon Officer knowledge and judgement as to the likelihood of the site being delivered in the next 5 years – categorised as “very high”, “high”, and “medium” likelihood of delivery.

15.1.3 Overall, there are 63 sites within the 5-year housing land supply – as shown in Final Proposed Housing Spreadsheet October 2024, #5 Final 5YS starting 2425. They are considered in conformity with the guidance set out in Planning Practice Guidance¹ as there is clear evidence that housing completions will begin on site within 5 years including:

- committed sites that are under construction, including many sites that are anticipated to be fully delivered within the first 5 years,
- full planning consents, outline permissions with subsequent reserved matters approvals, or consents from S73 / Minor Material Amendment applications, where the site can be fully delivered within the first 5 years or where construction can begin and a component or phase of the site will be delivered in the 5-year period,
- resolutions to approve - this demonstrates the developers’ aspirations for delivering the site whilst the Council approves of the development in principle. Once Section 106 agreements are signed, construction can begin and a component or phase of the site will be delivered in the 5-year period,
- sites that are engaging in the Development Management process or Design Review process – this will enable sites to be expedited through the planning approval process, where construction can begin and a component or phase of the site will be delivered in the 5-year period,
- capacity and phasing assumptions within submitted applications or pre-applications, where the land-use principles, scale and massing are considered by the Council to be acceptable in principle, as this will enable sites to be expedited through the planning

¹ (N)PPG Paragraph: 007 Reference ID: 68-007-20190722 and Paragraph: 020 Reference ID: 68-020-20190722

approval process, where construction can begin and a component or phase of the site will be delivered in the 5-year period,

- capacity and phasing have been agreed between development partners and the Council through Statements of Common Ground (SOCG) that have been recently signed,
- capacity and phasing have been refined on some sites following the 20% buffer uplift exercise and the reconsideration of the housing supply that has taken place since Matter 4 Hearing session and during the Hearing sessions on the sub areas, where additional capacity has been found or units have been brought forward into the 5-year supply,
- capacity and phasing on Council owned sites, that are aligned with the Council's house building and estate regeneration programmes,
- design-led work specific to certain sites that have been subjected to a masterplan process – this helps to clarify capacity and phasing of the site and expedite it through the planning approval process, where construction can begin and a component or phase of the site will be delivered in the 5-year period,
- capacity and phasing are aligned with other evidence base documents such as the London Strategic Housing Land Availability Assessment 2017 (EB21), the theoretical method for determining capacity, as set out in the Site Allocations Background Paper (EB15 and EB19), and average densities, based on evidence from the Residential Density Technical Paper 2020 (EB06),
- a switch from consented, conventional housing to other forms of housing such as purpose-built student accommodation - this can make a development more viable and will encourage delivery to come forward for development within the first 5 years,
- lapsed sites where the principal of delivering new homes has already been established and therefore planning approval and delivery can be expedited within the first 5 years,
- no evidence has been submitted to the Council that the development is unviable, or that there is no longer demand for the specific development proposed, or that the developer will no longer progress the site towards delivery, or that development has paused with the prospect that only longer term plans for delivery will take place.

15.1.4 All other sites that have less clear-cut evidence are considered to be developable but not deliverable in the 5-year period, and they have been phased beyond the first 5 years. They have been phased after year 11 and towards the end of the Plan period, where more uncertainty of delivery exists, and especially where the full potential for sites may be dependent upon transport improvements, such as the Bakerloo Line Upgrade and Extension.

15.1.5 It is noted that in some instances, developers are reconsidering their options for developing their sites, even on those sites that have been recently consented. For example, this has taken the form of swapping from conventional market housing to purpose build student accommodation. In other cases, developers have sought to re-design their schemes to accommodate the second stair core on tall buildings². The Council highlights that in cases where development partners are re-designing and reconsidering their schemes, the Council has received no evidence to demonstrate that the consented schemes are not viable. It is rather that the new proposals now being advocated by development partners are "more viable". The Council remains optimistic that development industry partners can resume delivery of these sites in a timely manner and thereby contribute to the 5-year supply as anticipated through consented schemes, especially as they have been phased towards the latter part of the 5-year supply.

² A requirement following the outcome of the Grenfell Inquiry.

15.1.6 During the course of the Hearing sessions, in particular those on the Borough's neighbourhoods and places, the Council has explored the possibility that some of the sites may now not be delivered when originally anticipated and consequently the housing trajectory has been refined. The Final Proposed Housing Spreadsheet October 2024 includes a mix of sites where:

- Some sites have retained their original capacity and phasing,
- Some sites have adopted a slower delivery approach where the number of units being delivered has been pushed back and the number of units within the first 5 years has reduced,
- Some sites have been realigned to accord with developers' aspirations and phasing timelines.

15.1.7 The Council has also re-visited Annex A under WS 15/1 to re-consider the deliverability of sites within the first 5 years, (especially the 13 sites originally categorised as Medium), based on the latest Officer knowledge and judgement of these sites. Tables A.1- A.6 in Annex A at the end of this document have been revised and now show that for years 1-5 (2024/25 – 2028/29) the majority of sites have a "high" (24 sites) or "very high" (37 sites) likelihood of being delivered. In addition:

- Four sites originally categorised as "medium" were found to be unlikely to be delivered in the first 5-years and their delivery has now been pushed back to beyond Year 6. This includes Land at Lewisham Road and Conington Road (Tesco), Lewisham Retail Park, Catford Island and Ravensbourne Retail Park. Consequently, these sites are no longer in the 5-year supply in #5 Final 5YS starting 2425 and no longer appear in Annex 1.
- One site (Willow Way) remains as "medium", and one site (Leegate Shopping Centre) has reduced from "high" to "medium". Despite this, they remain in the 5-year supply as they do not have significant factors associated with them that could stop delivery on-site altogether, such as development viability. The Council has received no evidence regarding their inability to deliver the specific schemes that have been consented and both landowners have already invested heavily in their sites through the planning and appeal processes.
- Eight sites have been re-categorized from "medium" to "high". These sites have been considered for slower delivery, but the Council maintains that the sites can be delivered within the 5-year supply. This is due to a combination of retaining only those parts of the site that have planning consent within the 5-year supply, having no evidence from landowners that the sites will not come forward for delivery, some groundworks already taking place and Statements of Common Ground that are aligned with the phasing identified by the Council.

15.1.8 The two "medium" sites and the eight sites re-categorised from "medium" to "high" (as mentioned in the two bullets above) have been phased towards the latter end of the first 5 years, thereby providing time for these sites to get back on track. It also gives them time for new applications to be consented, should the current consents not be implemented. The Council will continue to work with its development partners with the aim of progressing these sites within the 5-year housing supply, and thereby delivering the much-needed homes across the Borough.

15.2 *Having regard to the Planning Practice Guidance, what is the estimated total supply of deliverable and developable new housing during the Plan period 2020-2040?*

- 15.2.1 The Final Proposed Housing Spreadsheet October 2024 demonstrates a baseline supply of 34,855 new homes throughout the 20 year Plan period, consisting of site allocations, other large, consented sites and small site windfalls, of which:
- 2,022 (6%) have already been built or will have been constructed prior to March 2024.
 - 11,666 (33%) are considered to be deliverable and have been included within the first 5 years.
 - 21,167 (61%) are considered to be developable and have been included within Year 6 and beyond.

This is based on #1 Final starting 2425 excl. 450.

- 15.2.2 Tables A.1- A.6 in Annex A provide an overview of the robust, up-to-date evidence that demonstrates how the sites within Lewisham's 5-year housing supply are considered to be deliverable.

15.3 What is the estimated supply from each of the following sources:

- a) Completions since 2020.**
- b) Sites with detailed planning permission for 10 or more dwellings.**
- c) Sites with outline or detailed planning permission for 9 or less dwellings (small sites).**
- d) Windfall allowance.**
- e) Other sites with outline planning permission for 10 or more dwellings.**
- f) Site allocations.**
- g) Sites on the brownfield register.**
- h) Other sources not included in a-g above.**

- 15.3.1 The table below identifies the estimated number of new homes from each of the different sources of supply, based on the Final Proposed Source of Supply October 2024. Note that to avoid double counting, sites have been included within one category only. For instance, site allocations that have planning consent have been categorised in b) but not f).

- 15.3.2 Action 205 deals with the same matter. LC41 is the Council's response to Action 205 and has already been submitted to the Examination. It provides an updated version of the Table originally set out under its response to Matter 15 MIQ 15.3 – at Paragraph 15.3.3 – which identifies total completions and anticipated supply by source. Table 2 below replicates this information.

Table 2: Action 205

Supply	Number of new homes by individual type of supply	% of total supply	Number of new homes by category a - h	% of total supply
Full Plan Period 2020/21 – 2039/40				
a) Completions since 2020				
i) With 10 or more units completed between 20/21 – 22/23	940	3%		
ii) With 9 or less units completed between 20/21 – 22/23	590	2%	2,022	6%
iii) Sites anticipated to be completed in 23/24 with 10 or more units	113	<1%		
iv) Sites anticipated to be completed in 23/24 with 9 or less units	379	1%		
b) Sites with detailed/reserved matters planning permission for 10 or more dwellings				
i) That are under construction	4,925	14%	7,177	21%
ii) That have yet to start construction	2,252	6%		
c) Other sites with outline planning permission for 10 or more dwellings	6,417	18%	6,417	18%
d) Sites with outline or detailed planning permission for 9 or less dwellings (small sites)	See a ii above and g below	0	See a ii above and g below	0
e) Other sources not included in a-g above				
i) Sites with detailed/reserved matters planning permission for 10 or more dwellings that have a resolution to approve (subject to a Section 106 being agreed)	1,588	5%	8,293	24%
ii) Applications	315	1%		
iii) Pre-applications	6,360	18%		
f) Site allocations				
i) Carried forward from the adopted Local Plans	2,090	6%		
ii) That are considered in masterplanning studies	999	3%	4,912	14%
iii) Where no progress towards a planning consent has been made	1,823	5%		
g) Windfall allowance (from 2024/25 onwards)	6,064	17%	6,064	17%
h) Sites on the brownfield register	n/a*	n/a*	n/a*	n/a*
Total supply	34,855	100%	34,855	

**There are no additional sites to be identified through the Brownfield Land Register. All sites on the register that have a site size of 0.25 hectares and/or a capacity of 10 or more units are already part of the committed supply or site allocations and have already been considered in other categories. Sites smaller than 0.25 hectares or less than 10 units on the register are covered by category g).*

- 15.3.3 Table 2 shows that 34,855 new homes consist of the following source of supply, based on #1 Final starting 2425 excl. 450. In particular:
- a) 2,022 (6%) have already been built or will have been constructed prior to March 2024.
 - b) 7,177 (21%) already have detailed or reserved matters consent.
 - c) 6,417 (18%) have outline planning consent.
 - d) 0 – the Table does not separately consider consented schemes on sources of supply yielding 9 dwellings or fewer. These are considered as part of the windfall supply.
 - e) 8,293 (24%) have resolutions to approve, and applications or pre-applications.
 - f) 4,912 (14%) are site allocations.
 - g) 6,064 (17%) are small site windfalls (consisting of sites of 9 or less units).
- 15.3.4 The Council considers that the diversity in the sources of supply outlined above secures a robust portfolio of sites to be delivered over the Plan period. It is highlighted that there are no other meaningful sources of supply.
- 15.3.5 Further details of the sites that make up each component of the housing supply can be found in the Final Proposed Source of Supply October 2024. The individual tabs correspond with each of the sources of supply (ai – g), as shown above.
- 15.3.6 Category e) will increase to 8,743, if the 450 residential unit large windfall site is to be included in the housing trajectory, based on #2 Final starting 2425 incl. 450.

15.4 What evidence is there to support these estimates and are they justified?

15.4.1 The Council considers that the supply of housing set out in the table above is robust and justified. The supply has been predicated on a wide range of most up-to-date evidence, to determine the capacity and delivery of each site. This evidence is demonstrated in Tables A.1 - A.6 in Annex A and is aligned with the discussions held during the Hearing sessions on sub areas.

15.5 Is there compelling evidence to support the small site windfall allowance? How does it compare to the ‘small sites’ figure in Table 4.2 of the London Plan? How does it compare to previous rates of delivery on small sites?

15.5.1 The Council considers the approach taken towards small sites, including the small site target, to be justified. London Plan Policy H2 Small sites states, “Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to achieve the minimum targets for small sites set out in Table 4.2, as a component of the overall housing targets set out in Table 4.1”.

15.5.2 The Council fed into the small sites target by providing the Greater London Authority annual trends completions data for small sites for years 2006-2015. Consequently, the Greater London Authority used the data to project forward, then divided by 10 years to create an annual average small site target. The methodology underpinning the small site target was scrutinised and adjusted downwards during the London Plan Examination in Public.

15.5.3 The small site windfall allowance of 379 units per annum, as shown in the Final Proposed Housing Spreadsheet October 2024, replicates the ‘small sites’ target for Lewisham in Table 4.2 of the London Plan. The Council considers that the new Local Plan is therefore consistent and in general conformity with the London Plan.

- 15.5.4 Based on the data currently held, the Authority Monitoring Reports monitor completions on small sites but do so only for sites with less than 10 units, rather than the “smaller than 0.25 hectare” definition. It is noted that the Authority Monitoring Reports reveal that an average of 219 units per annum were completed on small sites (less than 10 units) since 2011, fluctuating between 149 and 317 units per year. It is likely that this average figure would increase if sites above 10 units but below 0.25 hectare were considered, making the 379 units per annum a reasonable small site target.
- 15.5.5 The Council suggests that the small site target is further justified as it will provide 6,064 units during the remainder of the Plan period, based on #1 Final starting 2425 excl. 450. This equates to 17% of the full housing supply, making it an important, but not the predominant, source of the overall housing supply.
- 15.5.6 The small site target is ambitious, but it reflects the Council’s approach of seeking to encourage development through the sensitive intensification on small sites. The Council is seeking to boost the delivery of small housing sites beyond the Borough’s historic delivery levels and is doing this in a number of ways.
- 15.5.7 It is noted that the Council adopted a Small Sites Supplementary Planning Document (SPD) in 2021 (EB20). It provides advice and good design guidance for anyone involved in preparing or reviewing planning applications for residential development on a small site in Lewisham. The SPD has a number of aspirations including to:
- Deliver more homes, including those that are genuinely affordable,
 - Helping to ensure that Lewisham achieves its annual housing targets,
 - Diversify the housing supply to make it more open to smaller operators,
 - Encourage local builders within Lewisham thus stimulating the local economy and creating local jobs,
 - Increase density/critical mass within our underdeveloped areas to help support local centres, and
 - Contribute towards coordinating the delivery of infrastructure within the south of our borough through the collection of the Community Infrastructure Levy and S106 contributions.
- 15.5.8 The Council has been pro-active in delivering new social rented homes on publicly owned, under-utilised sites such as Mayow Road and Kenton Court and continues to investigate the development potential of this source of supply. Most recently, the Council has been engaging with self-builders and small builders, to proactively consider options for bringing forward delivery of homes on small sites owned by the Council. The Council also recently commissioned RCKa³ to conduct a study of the development potential of small sites across the borough, by using artificial intelligence to identify suitable sites and classify them.
- 15.5.9 A new, pro-active policy has been included in the new Local Plan. Policy HO2 Optimising the use of small housing sites states, *“Opportunities should be taken to optimise the capacity of small sites for new housing development across the Borough, including through redevelopment of vacant and underused brownfield sites, and ancillary buildings such as garages, housing conversions, housing alterations and extensions and infill and backland development”*. This is particularly important in parts of the Borough where there are few opportunities for truly comprehensive change via the redevelopment of strategic sites. In

³ RCKa – is a socially responsive architecture practice based in London.

Lewisham's South Area, small scale developments, when combined together, could mutually support the delivery of the Bakerloo Line Upgrade and Extension.

15.5.10 The Council's response to Matters 9 and 16 provide further details.

15.6 What is the requirement for the first five years following adoption of the Plan and should a 5% or 20% buffer be applied, given the HDT results?

15.6.1 The results of the 2022 Housing Delivery Test measurement (published in December 2023) demonstrate that Lewisham delivered only 51% of the housing requirement over the reporting period and is now required to plan for a 20% buffer in the five-year housing land supply. At Submission (in November 2023), the new Local Plan had already identified and accounted for a 5% buffer, in addition to the London Plan housing target and the backlog.

15.6.2 The Council's response to Matter 4, MIQ 4.3 sets out in detail how it has sought to accommodate a 20% buffer. Critically, this includes a comprehensive "no stone left unturned approach". The Additional Housing Supply Background Paper (LC10) demonstrates that the Council is doing all it can reasonably do to secure an uplift in capacity. At that time, it concluded that the new Local Plan can only realistically find a sufficient supply of genuinely deliverable sites⁴ to accommodate a 17.5% buffer. The Council acknowledges that this falls short of the 20% buffer by 288 units.

15.6.3 To rectify this shortfall, there are a few options available to the Council. These are set out as follows.

15.6.4 One option is to seek assistance from neighbouring London Boroughs; formally requesting that they consider accommodating Lewisham's unmet need. The Council has already made this request to its neighbours earlier in the plan-making process. The Council emphasises that the Statements of Common Ground between the Council and its neighbouring London Boroughs all state "*Both parties will continue working towards meeting or exceeding their London Plan housing requirement within the confines of their own borough's administrative boundary, without requesting assistance from neighbouring authorities to accommodate unmet need*".

15.6.5 Subsequent to the publication of the results of the 2022 Housing Delivery Test measurement in December 2023, the Council has met with the surrounding London Boroughs in a South East London Duty to Cooperate (SELDTC) meeting on 14th June 2024. The Council sought their opinion regarding their ability to consider the remaining unmet 2.5% (buffer) that cannot be demonstrably accommodated within Lewisham⁵. The 2.5% unmet need equates to approximately 288 new homes.

15.6.6 As anticipated, the ability of its neighbouring boroughs to contribute is limited. This is particular so given that the Council's neighbours are in the same position as Lewisham. As a consequence of poor housing delivery performance, the presumption in favour of sustainable development now applies to the London Boroughs of Bromley, Greenwich, and Southwark. The London Borough of Bexley is on a similar trajectory and is required to prepare a Housing Delivery Test Action Plan. The outcome of the SELDTC meeting was that

⁴ That could come forward and be completed during the first five years of the plan period – in accordance with NPPF Paragraph 74.

⁵ For clarification, specifically during the first five years of the plan period.

none of the surrounding London Boroughs can take Lewisham's unmet need. The note of the meeting can be found in Appendix 4 of the Duty to Co-operate Statement Addendum.

- 15.6.7 Another option is to delay the adoption of the new Local Plan, until sufficient housing land can be found, or alternatively to abandon the process and commence preparation of an entirely new plan. The Council strongly suggests that the first of these options would prove challenging. This is because the Council has already demonstrated, through the Additional Housing Supply Background Paper 2024 (LC10), that there are no additional sources of supply of suitable housing land available to add into the 5-year supply. Even if, theoretically, entirely new suitable sites for large or strategic sized residential or mixed-use development could be found in the borough, they may not be added to the 5-year supply because they may not meet the definition of being "deliverable", in line with the Glossary of the NPPF. Delaying the adoption of the new Local Plan will only compound the current delivery position.
- 15.6.8 Abandoning the current plan-making process may theoretically allow new sites to be identified (possibly through the next iteration of the London Strategic Housing Land Availability Assessment), but this would be as part of the longer-term housing supply. There is no evidence to suggest that this approach would secure new development sites suitable for large or strategic sized residential or mixed use development, that would enhance housing supply in the first 5 years. There are other reasons why the new Local Plan should not be abandoned or delayed, namely that the Council has invested considerable resources and finances during the preparation of this plan and there is strong support, in general, for it from Councillors, statutory consultees, stakeholders, development partners and the general public.
- 15.6.9 Critically, for plan-making and decision-taking, either approach will result in a significant delay, which is conservatively estimated at approximately 18 to 24 months. It is a factual position that such delay will result in the continuation of an out-of-date Local Plan, creating a policy vacuum and more uncertainty. This will be unhelpful to the development industry, whose poor performance in housing delivery is unlikely to improve in an atmosphere of uncertainty. Equally, significant delay will also lead to much of the current local plan evidence base becoming out-of-date. If these technical pieces of work need to be revisited, further protracted delays will be inevitable.
- 15.6.10 The last option available to the Council is to revisit the housing requirement. This was discussed during the Hearing session on Matter 4. The Council has subsequently investigated a range of scenarios in terms of catering for the backlog and 20% buffer. This is detailed in Part 1 of the Housing Requirement and Supply Scenarios Paper (LC32). The final versions of the scenarios are shown in the Final Proposed Housing Spreadsheet October 2024, #7 Final scenarios starting 2425 and #8 Final scenarios starting 2526.
- 15.6.11 The scenarios provide different options for dealing with the backlog, so that it allows for a reduction in the housing requirement during the first 5 years:
- Scenario C seeks to address the backlog by the end of the first 5 years in 2028/29 (i.e., the Sedgfield approach) – with a housing requirement of 2,833 p.a. during years 1 – 5 and 1,667 p.a. thereafter.
 - Scenario D seeks to address the backlog by the end of the first 10 years.
 - Scenarios E and F seek to address the backlog over the next 15 or 16 years – the remainder of the Plan period (i.e., the Liverpool approach).

- Scenarios G and H seek to address the backlog over the next 10 and 16 years and also use a stepped trajectory, so that the need to deliver housing is reduced in the first 5 years but then increased after year 5 to compensate for it.
- A second version of scenarios E.2, F.2, G.2 and H.2 apply the same principles but include an extra 450 residential units from a large, windfall site within the housing supply (beyond year 5). This is a newly identified site that the Council became aware of towards the latter part of the Hearing sessions.

15.6.12 Following this, the whole sequence of scenarios has been re-run, where the housing trajectory is rolled forward so that Year 1 starts in 2025/26, in order to demonstrate that there is a deliverable five-year supply of housing land at adoption in 2025.

15.6.13 Table 3 provides an overview of the results of the scenario testing, based on the housing supply in the Final Proposed Housing Spreadsheet October 2024. It concludes that where the housing trajectory starts Year 1 in 2025/26, there would be a shortfall of housing against the housing requirement during the first 5 years; if the backlog is to be catered for over the first 5 or 10 years (C and D). All other scenarios (backlog catered over 15 or 16 years and stepped trajectories E, F, G and H) would provide a surplus of housing against the housing requirement in Years 5, 15 and 16. The inclusion of the newly identified large windfall site (E.2, F.2, G.2 and H.2) would boost the supply further.

15.6.14 Where the housing trajectory is rolled forward so that Year 1 starts in 2025/26, there would be a shortfall of housing against the housing requirement, if the backlog is to be catered for over the first 5, 10 or 15 years (C, D and E). The stepped trajectories provide a surplus supply of housing against the housing requirement (G and H). The inclusion of the newly identified large windfall site (E.2, F.2, G.2 and H.2) would boost the supply further.

15.6.15 The Councils preferred approach is scenario E.2 when Year 1 starts at 2025/26 and the newly identified large windfall site is included within the housing supply. This provides for 5.00 deliverable years (with only a small shortfall of 6 units) at Year 5 and a surplus of 325 units at Year 15. This Liverpool approach advocates a pragmatic method which allows the housing supply to meet and exceed the housing requirement over the lifetime of the new Local Plan.

Table 3: Overview of Scenario Results

			Starting Year 1 at 24/25			Starting Year 1 at 25/26	
			Year 5	Year 15	Year 16	Year 5	Year 15
			Supply				
Final delivery excl 450			11,666	31,340	32,833	11,384	30,251
Final delivery incl 450			11,666	31,790	33,283	11,384	30,701
Surplus or shortfall against requirement							
C	Backlog over 5 years	Final delivery excl 450	-2,499	505	331	-2,781	-584
		Final delivery incl 450	n/a	n/a	n/a	n/a	n/a
D	Backlog over 10 years	Final delivery excl 450	-419	850	676	-701	-239
		Final delivery incl 450	n/a	n/a	n/a	n/a	n/a
E	Backlog over 15 years	Final delivery excl 450	276	964	790	-6	-125
		E.2 Final delivery incl 450	276	1,414	1,240	-6	325
F	Backlog over 16 years	Final delivery excl 450	361	1,195	804	n/a	n/a
		F.2 Final delivery incl 450	361	1,645	1,254	n/a	n/a
G	Stepped trajectory and backlog over 10 years	Final delivery excl 450	781	1,050	876	499	-39
		G.2 Final delivery incl 450	781	1,500	1,326	499	411
H	Stepped trajectory and backlog over 15 or 16 years	Final delivery excl 450	1,561	1,395	1,004	1,194	75
		H.2 Final delivery incl 450	1,561	1,845	1,454	1,194	525

15.7 Can the submitted Local Plan specifically demonstrate a deliverable five-year supply of housing land at adoption and, if so, is there a reasonable prospect of this being maintained throughout the Plan period? In particular:

- 15.7.1 The Council considers that there is a reasonable prospect of maintaining a deliverable 5-year supply throughout the Plan period; if the Liverpool approach is used. In contrast using the Sedgefield approach will reduce the likelihood of maintaining a deliverable 5-year supply throughout the Plan period. This demonstrates that it is beneficial to cater for the backlog over a longer period, thereby relieving pressure during the first 5 years of the Plan.
- 15.7.2 The Council will monitor deliverable supply through the Authority Monitoring Reports and Housing Delivery Test. It is also highly likely that the Council will have made a start on a Local Plan review prior to the end of the Plan period, given that local authorities are now encouraged to do so every 5 years. The Council may also find new sites suitable for longer term development towards the latter end of, and beyond, the Plan period. This will take place in collaboration with the Greater London Authority as they prepare the next iteration of the London Strategic Housing Land Availability Assessment (SHLAA).
- 15.7.3 The Final Proposed Sources of Supply October 2024 demonstrates the diverse portfolio of sites that will be delivered throughout the majority of the Plan period and that they are at different stages in the planning process. Indeed, there is a current committed supply of 15,182 new homes from full, reserved matters, outline consents and resolutions to approve. The Council therefore maintains that not meeting the 2022 Housing Delivery Test measurement is due to poor delivery of consented schemes, by developers, as opposed to a lack of housing land supply.
- 15.7.4 However, it is acknowledged that successfully completing these new homes may be problematic if the recent poor developer performance in housing delivery continues. There have been a number of reasons why housing delivery has slowed down in recent years, and these are explained in the Housing Delivery Test Action Plan 2024, <https://lewisham.gov.uk/-/media/0-planning/planning-policy/annual-monitoring-report/lewisham-hdt-action-plan-june-2024.pdf>.
- 15.7.5 Both the Housing Delivery Test Action Plan and the Additional Housing Supply Background Paper 2024 (LC10) emphasise that the Council has taken a comprehensive approach to allocating sites in the new Local Plan and that increasing the housing land supply further will not contribute towards securing an improvement in housing delivery performance. The Housing Delivery Test Action Plan includes a number of key actions, beyond increasing the housing supply, that will help to boost housing delivery in the future.

15.8 Is it appropriate to account for previous under-delivery in the calculation of housing supply?

- 15.8.1 The Council considers that it is appropriate to account for the undersupply of 3,471 new homes as at the end of 2022/23, within the housing supply calculation. The Council considers that this is important given the significant need for housing across the Borough. The Council maintains that whilst there are different ways to cater for backlog (as mentioned above), the Council's preferred approach (E.2) is the most realistic way to resolve the backlog. The Liverpool approach will reduce the annual backlog requirements for the first 5 years and cater for the backlog more equally over the Plan period.

15.9 Overall, would at least 10% of the housing requirement be accommodated on sites no larger than one hectare as set out in NPPF paragraph 69?

15.9.1 As noted in the response to Matter 10, MIQ 10.57, the Council considers that the approach taken towards small sites is sound and aligns with NPPF Paragraph 69. The Council considers that small and medium sized sites can make an important contribution to meeting the housing requirement of the borough and is taking a proactive approach to support their delivery. This includes proactive policies within the new Local Plan and the adoption of the borough's Small Sites Supplementary Planning Document. Given Lewisham's built-up nature as an Inner London Borough, much of the redevelopment within the Borough will take place on small sites of 1 hectare or less.

15.9.2 The Final Proposed Housing Spreadsheet October 2024 includes a variety of sites of different site sizes. It is highlighted that 43 of the 75 site allocations are sites of 1 hectare or less. Furthermore:

- 25% of the 5-year housing requirement will be provided on site allocations and other large, consented sites of 1 hectare or less. This rises to 38% if small site windfalls are considered.
- 15% of the 15-year housing requirement will be provided on site allocations and other large, consented sites of 1 hectare or less. This rises to 30% if small site windfalls are considered.
- 16% of the 16-year housing requirement will be provided on site allocations and other large, consented sites of 1 hectare or less. This rises to 32% if small site windfalls are considered.
- In total 5,285 of the units will be located on sites no larger than 1 hectare, equivalent to 19% of the total housing supply of 34,855 across the Plan period. This rises to 35% of the total housing supply, if small site windfalls are considered.

15.9.3 This is based on #1 Final starting 2425 excl.450. Variation #3 Final starting 2526 excl. 450 also provides a supply of small sites above 1 hectare well above 10% of the housing requirement. Variations #2 and #4 don't apply as the windfall site is above 1 hectare.

15.10 How has flexibility been provided in terms of the housing land supply? Are there any other potential sources of supply not specifically identified? Can this be specified?

15.10.1 The Council has adopted a flexible approach to housing land supply and considered a wide range of sources through the site identification and selection process, as detailed in Matter 16 MIQ 16.3. The sites range in type and size from major, strategic sites that will deliver a mix of uses and create new communities down to small site windfalls providing just a few residential units. There are no other potential sources of housing land supply to be considered. The Council reiterates that a "no stone left unturned approach" has been taken and there are no demonstrably credible alternatives.

15.10.2 Furthermore, towards the latter end of the Hearing sessions, the Council became aware of a new, large windfall site with an indicative capacity of 450 residential units. This has been taken into account in variations #2 and #4 of the Housing Trajectory. The Council's response to Matter 15 Action 204 provides more details on this site.

15.10.3 The Council also considers that it has taken a dynamic approach throughout the plan-making process. The capacity and phasing of site allocations, and their corresponding entries in the Housing Trajectory have been reviewed and refined throughout the plan-making process to

reflect changing circumstances. These have included the progress made on sites, newly arising aspirations from developers using the most up-to-date evidence, the way the development industry is responding to inflation and skills shortages, the need to uplift the supply to meet the 20% buffer and the need to accommodate different forms of housing such as purpose-built student accommodation and co-living schemes.

15.11 What are the assumptions about the scale and timing of supply and annual rates of delivery for sources of supply set out in the housing trajectory in Appendix 6? Are the assumptions realistic compared to previous rates of delivery?

15.11.1 Detailed consideration has been given to the reasoning and evidence behind the phasing and delivery of sites in the Final Proposed Housing Spreadsheet October 2024 and Annex A, especially the sites in the first 5 years. The Council maintains that the assumptions are robust and supported by appropriate and proportionate evidence. The Council has sought to engage with developers and has signed Statements of Common Ground with many of the sites within the 5-year housing supply, where scale and phasing of the site have been established. Following the Hearing session on Matters 4 and 15, the Council has revisited the delivery assumptions and amendments have been made to the Final Proposed Housing Spreadsheet October 224 and Annex A where necessary.

15.11.2 The Council has adopted a theoretical and indicative approach to site capacities on some sites where accurate information from consents, applications and pre-applications are not available. The theoretical approach provides a proxy as a starting point and each site will be determined through the Development Management process on a site-by-site basis. It is suggested that actual planning consents could cater for a higher number of new homes than presented in the housing trajectory. Consequently, the Council predicts that delivery could remain either constant or secure an upward direction. However, recent development industry performance remains a concern. There are a number of reasons for this, as set out in the Housing Delivery Test Action Plan. The Council concludes that available evidence demonstrates that the addition of further new homes into the 5-year supply target will not guarantee delivery. The Action Plan identifies key actions to help boost delivery. See the Council's response to Matter 15 MIQ 15.7 for more details.

15.11.3 The Council highlights that whilst recent rates of delivery have been poor and below average, this has not always been the case. The Council has carried out an exercise to assess the annual rates of delivery within the Housing Trajectory against annualised completions figures derived from data in the Authority Monitoring Report. This considered a range of strategic sites with capacity of 100 units or more. The exercise calculated the annualised completion figures by dividing the total amount of units completed by the number of years of construction, from start to finish. The results show that:

- The Plough Way sites were delivered at an average rate of 226 units per annum,
- Loampit Vale was delivered at an average rate of 158 units per annum,
- Heathside and Lethbridge was delivered at an average rate of 103 units per annum,
- Catford Stadium was delivered at an average rate of 124 units per annum,
- Lewisham Gateway Phase 1 was delivered at an average rate of 132 units per annum,
- Seager Building was delivered at an average rate of 111 units per annum.

15.11.4 It is noted that 10 sites in the housing trajectory contain annual delivery rates that exceed the average of 226 units, i.e., greater than the maximum average rate identified above. These sites include Lewisham Shopping Centre^{*}, Lewisham Retail Park, Catford Island,

Ravensbourne Retail Park, Convoys Wharf[^], Deptford Landings^{*^}, Surrey Canal Triangle^{*^}, Leegate Shopping Centre, Bell Green Gas Holders, and Livesey Memorial Hall^{*} and Excalibur. There are a number of reasons why the Council considers these rates, whilst high, remain plausible:

- Those marked * have multiple ownerships, making it plausible for multiple plots to be delivered at the same time,
- Those marked ^ are the Borough's largest development sites with capacities significantly above the 1,300 units on the Plough Way sites. There is a general correlation that the larger the site, the more units can be constructed per annum when multiple development plots or phases can be delivered together. For instance, the maximum amount delivered during one year of construction on the multi-phased and multi-plot Plough Way site was 607 units,
- All of the sites will contain elements of tall buildings, and this creates a "lumpy" supply. Whilst they take more than one year to construct, the amount of delivery on the year of completion can be significant. For instance, the site at Thurston Road delivered 415 in one year. It is anticipated that during 2024/25 Lewisham Gateway will complete 649 units, Heathside and Lethbridge will deliver 443 units and Conington Road will deliver 365 units.

15.12 *Would the Local Plan realistically deliver the number of homes required over the Plan period?*

15.12.1 The Council's ability to "deliver" housing is limited and is highly reliant upon private developers⁶. If sites come forward for development as planned, the Council considers that the number of homes required over the remaining Plan period can be met, based on the 75 site allocations, other large, committed sites and small scale windfalls, as set out in the Final Proposed Housing Spreadsheet October 2024.

15.12.2 In terms of variation #1 and #2, the supply of 32,833 housing units, or 33,283 if the large windfall site is included in the housing supply, exceeds the housing requirement over the next 16 years, that ranges between 31,829 and 32,502 (depending upon the scenario used).

15.12.3 In terms of variation #3 and #4, where the start of Year 1 is rolled forward to 2025/26, the supply of 30,251 units, or 30,701 units if the large windfall site is included in the housing supply, exceeds the housing requirement over the next 15 years that ranges between 30,176 and 30,376 but only for some of the scenarios including H, E.2, G.2 and H.2.

15.12.4 The Council's responses to the remainder of the questions raised under Matter 15 demonstrate that a realistic approach has been taken, by utilising a range of evidence to ensure that the proposed capacities and phasing are feasible and based on the latest knowledge, including the most up-to-date intelligence found subsequent to the Hearing sessions on Matters 4 and 15. It is reiterated that the Local Plan in general, and the site allocations and housing trajectory have been adjusted and refined at each stage of the plan-making process to ensure that the housing supply is optimised, as much as possible.

15.12.5 The Council acknowledges that Lewisham has experienced poor delivery performance recently. The Council maintains that not meeting the 2022 Housing Delivery Test

⁶ Public sector housebuilders are active in Lewisham but unlike other places in the Capital are responsible for delivering a relatively low proportion of planned-for growth.

measurement (published in December 2023) is not due to a lack of housing land supply. There is already a consented supply of 15,182 consisting of 7,177 new homes consented through detailed and reserved matter applications, 1,588 new homes committed through resolutions to approve and 6,417 new homes with outline planning consent. The successful delivery of the spatial strategy is predicated on our development partners building out these committed schemes in a timely manner. Expediting the Local Plan towards timely adoption will give the development industry the confidence they require. Consequently, once the site allocations are adopted, development schemes aligning with the site allocations can progress swiftly through the Development Management and planning approval process, thereby helping to improve delivery performance across the Borough.

15.13 *Is the approach to increasing housing supply set out at part C of Policy HO1 of the Plan justified? How does the Council propose to achieve a ‘carefully managed uplift’ in the delivery of new housing development across the Borough?*

15.13.1 The Council considers the carefully managed uplift to not only be justified, but essential in order to implement the spatial strategy, meet the London Plan housing target and meet the need for genuinely affordable housing. There are a number of different routes to increasing housing supply which reflect the varying scale of opportunities available. All such routes to housing delivery aim to direct development in support of Good Growth.

15.13.2 It is noted that of Policy HO1 Meeting Lewisham’s housing needs Part C identifies these routes by prioritising the type and location of development and supporting development that:

- Directs new housing to sustainable locations consistent with the spatial strategy,
- Complies with the site allocation requirements,
- Facilitates the sensitive intensification of residential areas through the delivery of small sites (including windfall sites),
- Provides for housing estate renewal and regeneration with no net loss of affordable housing,
- Makes the optimal use of land,
- Makes the best use of the existing housing stock, whilst
- Refusing development that will result in the net loss of housing.

15.13.3 It is noted that the Core Strategy 2011 Spatial Policy 1 sought an additional 18,165 net new homes over 15 years. This equated to 1,211 new units per annum and is significantly lower than the step change in growth now being proposed in the Council’s preferred Scenario E.2, with a target of 2,278 new units per annum during the first 5 years and 1,898 thereafter.

15.13.4 It is further noted that the term “carefully managed uplift” recognises that whilst growth is essential for the Borough, it needs to be done in such a manner that it protects Lewisham’s character. For instance, tall buildings will only be allowed in appropriate, selected, highly accessible locations (that have the capacity to accommodate them); and existing residential areas will only be allowed to intensify where this can be achieved sensitively without harming their existing character.

15.14 *Overall, is the Plan’s approach to housing supply and the housing trajectory positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?*

- 15.14.1 As set out in the Council's responses above and the Final Proposed Housing Spreadsheet October 2024, it is considered that the approach taken towards housing land supply is robust and justified.
- 15.14.2 The Council also considers that the approach has been prepared positively, with the inclusion of 75 site allocations that will contribute towards the delivery of a strong spatial strategy that is predicted on sustainable growth. This will take place in selected parts of the Borough such as within Opportunity Areas, in town and district centres and along the A21 and other main transport corridors, whilst at the same time protecting the character of the borough. A "no stone left unturned approach" has been used in the identification of sites and the Council is doing everything it can to deliver as much housing as possible within the confines of the Borough.
- 15.14.3 Furthermore, the Council considers that the approach aligns well with the London Plan's policies, especially Policy H1 Increasing Housing Supply and Policy H2 Small sites as well as Table 4.1 and Table 4.2 that set out the 10-year targets for net housing completions and for small sites. The Greater London Authority has not raised this as an issue of general conformity and their representations received at Regulation 19 support many aspects of the approach taken towards the housing land supply.
- 15.14.4 In conclusion, the approach the Council has taken is consistent with national policy. The Council now has a clear preference in how to address the challenging situation in a pragmatic way:
- by starting Year 1 of the 5-year supply in 2025/26 and by adding the large 450 residential unit windfall site into the housing supply i.e., variation #4, and
 - by using Scenario E.2, with the Liverpool Method catering for the backlog over the remainder of the Plan period, in addition to catering for a 20% buffer in the first five years.
- 15.14.5 This combination of approaches allows for a housing supply which includes 5.00 deliverable years and creates a surplus of 325 housing units by the end of the Plan period, when compared against the 15-year housing requirement.
- 15.14.6 Whilst 5.00 deliverable years is tight, the Council believes that enhanced capacities will arise on some of the site allocations within the 5-year supply, from deliberations on a site by site basis as the allocation progresses through the Development Management process. This may also occur on site allocations phased towards the latter end of the Plan period which may benefit from increased capacities arising from the delivery of the Bakerloo Line Upgrade and Extension. In summary, the Council anticipates that supply will rise over the life of the new Local Plan.
- 15.14.7 It is also highly likely that a new housing target for the Borough will be provided through the review of the London Plan - work on the London-wide SHLAA has already begun, and therefore it is reasonable to assume that the Council will begin a review of the Local Plan well in advance of the latter end of the current Plan period.
- 15.14.8 The Council seeks the opinion of the Inspectors regarding the Council's preferred approach outlined in paragraph 15.14.4 above and whether or not it is the most appropriate approach to take.

15.15 Are any modifications necessary for soundness?

15.15.1 The Council concludes that further modifications will be necessary to secure the soundness of the housing land supply. The Council highlights that the response to this, and other Matters have previously identified the need for modifications that have arisen from the capacity uplift work. The reconsideration of the housing requirement and supply that has recently been carried out by the Council throughout the course of the Hearing sessions has also led to further modifications.

15.15.2 The Final Proposed Housing Spreadsheet October 2024 incorporates the latest position, capacity and delivery timescales regarding all of the site allocations, especially #4 which is the Council's preferred approach. For consistency, the housing trajectory in Appendix 6 will need updating to align with this. In particular, modifications will show how the capacities and phasing in the housing trajectory has changed between the Housing Trajectory – Update to Appendix 6 (2023) (PD18) and the #4 final version of the Housing Trajectory now favoured by the Council. It will also generate consequential amendments that need to be made to individual site allocations. The Council is responding to this by preparing appropriate modifications to the new Local Plan that will be the subject of a separate response.

Annex 1: Evidence of deliverability for sites within the 5-year housing supply

The tables below consider the likelihood sites being delivered (or started) within the first 5 years and categorises the sites as set out below:

Very high (interchangeable with the term definite prospect of being delivered in EB15) as the site is progressing well including:

- A. Sites with planning permission that are under construction.
- B. Sites with planning permission that are about to commence development.
- C. Sites that have a resolution to approve and are in the process of negotiating s106 agreements.

High (interchangeable with the term good prospect of being delivered in EB15) as the site is at an early stage but are not currently stalled including:

- D. Sites that have submitted an application.
- E. Sites that are negotiating s73 applications and reserved matters, can deliver the consented parts of the site or new phases of development are being considered on remaining plots.
- F. Sites that have held pre-application discussions and/or preparing masterplans.

Medium (interchangeable with the term reasonable prospect of being delivered in EB15) as the site is making slower progress than expected including:

- G. Sites that have currently stalled or are taking longer than expected to be built, e.g., lapsed applications, permitted sites that are slow to start construction or slow to be built out, sites at appeal.
- H. Sites where developers are reconsidering their options for redeveloping their sites, even on sites with planning consent.

The tables should be read alongside Appendix C of Site Allocations Background Paper 2023 (EB15), and the Additional Housing Supply Background Paper 2024 (LC10). However, some of the sites have made progress towards gaining planning consent and capacity and phasing for some sites has been refined during the course of the Hearing sessions; in particular in line with the reconsideration of the housing requirement and housing supply and in line with the discussions held with our development partners during the Hearing sessions on the five sub areas. The supporting evidence below provides an up-to-date picture of site progress and demonstrates deliverability for those sites within the first 5 years.

Table A.1: Site is under construction (b i)

Based on #1 Final starting 2425 excl. 450

Site reference	Site name	Residential units	Supporting evidence	Likelihood of being delivered
LCA SA 01	Lewisham Gateway	649 new homes, all in 5-year supply	Existing site allocation SSA6 is under construction. Site has hybrid outline consent for major development, consisting of outline for the whole site and detailed planning consent for Phases 1 and 2 (i.e., whole site). Phase 1 has already been completed. Construction paused between phases. Phase 2 is almost complete and is due for completion in Year 1 (24/25). 649 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (A)
LCA SA 04	Conington Road	365 new homes, all in 5-year supply	Proposed site allocation is under construction. Construction on this site has taken longer than anticipated and 365 units have been rolled back from 23/24 to Year 1 (24/25). Was identified as very high in EB15, so no change. 365 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (A)
LCA SA 09	Silver Road and Axion House	141 new homes, all in 5-year supply	Proposed site allocation is at advanced stage of construction. Site has detailed planning consent. 141 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (A)
LNA SA 02	Deptford Landings MEL (formerly known as Oxestalls Road) and Scott House	1670 new homes (remaining), with 1,265 in 5-year supply	Existing site allocation SSA4 is under construction. Site has hybrid consent, with outline for major development across the whole site but also reserved matters for the whole site too. First plot has already been completed. Construction has started on some plots, but not all. Scott House is engaging with the Development Management process, and is switching from conventional housing to student accommodation. Both parts of the site are engaging in the Design Review Panel process. LC10 increased the 5-year supply to align with latest consents and pre-app. Both Deptford Landings and Scott House have a Statement of Common Ground that agrees the phasing of the site, and both can be delivered at the same time. 300 extra in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (A)
LNA SA 04	Neptune Wharf MEL	199 new homes, all in 5-year supply	Existing site allocation SA10 is under construction. Site has detailed planning consent. 199 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (A)
LNA SA 05	Surrey Canal Road and Trundleys Road LSIS	279 new homes, with 219 in 5-year supply	Proposed site allocation is under construction. Site has detailed planning consent. Was identified as high in EB15 as site had stalled but has now resumed construction so has increased to very high. LC10 brought forward some of the supply into the 5-year supply. Site has been phased in Year 5, allowing time for the site to be delivered.	Very high (A)

			60 units have been added for delivery beyond Year 6, in relation to the northern, unconsented part of the site, that had previously been missed.	
LNA SA 07	Silwood Street	61 new homes, all in 5-year supply	Proposed site allocation is under construction and has recently been completed. Site has detailed planning consent.	Very high (A)
LNA SA 16	Land North of Reginald Road and South of Frankham Street (Former Tidemill School)	193 new homes, all in 5-year supply	Existing site allocation SA3 is under construction. Site has detailed planning consent. Site is almost complete. 89 units already completed. 83 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (A)
LNA SA 17	Lower Creekside LSIS	171 new homes (remaining), with 153 in 5-year supply	Existing site allocation SA14 started construction. 56 units at 1 Creekside has already been completed. 2 Creekside has a submitted application. 3 Creekside is engaging with the Development Management process. 2-3 Creekside is engaging through the Design Review Panel process. 2-3 Creekside has a Statement of Common Ground that agrees the phasing of the site. 5-9 Creekside has been granted consent. 5-9 Creekside is engaging with the Development Management process and the Design Review Panel process. 5-9 Creekside has a Statement of Common Ground that agrees the phasing of the site. Site has been phased in Year 4 and beyond, allowing time for the site to be delivered. Categorised as high as whole site does not yet have full planning consent. LC10 increased the 5-year supply to align with latest applications and pre-app. Site capacity has been decreased from 210 to 209 and rescheduled to reflect the fact that 1 Creekside has been built out and 5-9 Creekside now has planning consent. Extra 18 units on 4 Creekside that had been mistakenly omitted.	High (E)
LEA SA 01	Heathside and Lethbridge Estate	443 new homes, all in 5-year supply	Proposed site allocation has hybrid consent, with outline for the whole of the site but reserved matters for the whole of the site too. First 4 phases have already been completed. Phases 5 and 6 are almost complete. Part of an estate regeneration programme. Construction on this site has taken longer than anticipated and 284 units have been rolled back from 23/24 to Year 1 (24/25) and added to 159 creating a total of 443 in Year 1 (24/25). 443 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
LSA SA 13	Excalibur Estate	402 new homes, (remaining), all in 5-year supply	Proposed site allocation has hybrid consent, with outline for the whole of the site and reserved matters for some of the site too. First phase has already been completed. Remaining phases are engaging with the Development Management process. Categorised as very high in EB15 as it is part of an estate regeneration programme, and although it is being progressed it is at a slower rate than anticipated, so has reduced to high.	High (E)

			Unconsented part of the site has been phased in Year 4 and beyond, to reflect current knowledge on phasing of the site. This will allow time to go through the planning approval process. 102 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	
	1 White Post Street	21 new homes, all in 5-year supply	Unallocated large site is under construction. Site has detailed planning consent. Site capacity is less than 50 units and can be built out swiftly. 21 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	Shaftsbury Christian Centre, Frankham Street	33 new homes, all in 5-year supply	Unallocated large site is under construction. Site has detailed planning consent. Site capacity is less than 50 units and can be built out swiftly. 33 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	Safa House, 28 Arklow Road	14 new homes, all in 5-year supply	Unallocated large site is under construction. Site has detailed planning consent. Site capacity is less than 50 units and can be built out swiftly. 14 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	333-337 New Cross Road	25 new homes, all in 5-year supply	Unallocated large site has recently been completed. Site has detailed planning consent. 25 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	152 Lee High Road	17 new homes, all in 5-year supply	Unallocated large site is under construction. Site has detailed planning consent. Site capacity is less than 50 units and can be built out swiftly. 17 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	1-3 Bellingham Road	18 new homes, all in 5-year supply	Unallocated large site is under construction. Site has detailed planning consent. Site capacity is less than 50 units and can be built out swiftly. 18 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	86-92 Bell Green	22 new homes, all in 5-year supply	Unallocated large site is under construction. Site has detailed planning consent. Site capacity is less than 50 units and can be built out swiftly. 22 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very High (A)
	Mais House	110 new homes, all in 5-year supply	Unallocated large site is under construction. Site is being progressed by the Council.	Very High (A)
	Total	4350 in Years 1-5 for sites under construction		

Table A.2: Site has consent (b ii)

Based on #1 Final starting 2425 excl. 450

Site reference	Site name	Residential units	Supporting evidence	Likelihood of being delivered
LNA SA 01	Convoys Wharf MEL (reserved matters approvals only)	580 new homes, all in 5-year supply plus 2,920 beyond year 5	Existing site allocation SSA2 has a planning consent. Permission has been granted for the outline application, although 580 units on 3 Plots now have reserved matters consent. Site is engaging with the Development Management process. The site was paused to explore redevelopment options. Changed to high status, as the units within the 5-year supply all have reserved matters consent. The site has a Statement of Common Ground that agrees with the phasing of the site. Also, the site has been phased in Year 5 and beyond, allowing time for the site to recover or go through the planning approval process. Extra 260 in 5-year supply if start Year 1 of housing land supply in 25/26.	High (E)
LNA SA 06	Apollo Business Centre LSIS	235 new homes, all in 5-year supply	Proposed site allocation has detailed planning consent. Was identified as medium in EB15 but site now has consent so has increased to very high.	Very high (B)
LNA SA 10	Corner of Besson and Briant Street	324 new homes, all in 5-year supply	Existing site allocation SA7 has detailed planning consent. Was identified as very high in EB15 as the site is being progressed by the Council, although originally it was identified as coming forward slower than anticipated, with medium status. The site has been reconsidered and changed to high status. The site has been pushed back with a slower delivery in Years 4 and 5 (27/28-28/29), allowing time for the site to recover or go through the planning approval process.	High (E)
LNA SA 18	Sun Wharf MEL (including Network Rail Arches)	220 new homes, all in 5-year supply	Existing site allocation SA11 has detailed planning consent. Site is engaging with the Development Management process. Was identified as high in EB15 but new application is being sought, switching from conventional residential to student accommodation, so had originally shown as medium. Site has been re-considered and changed to high status as the site has a Statement of Common Ground that agrees with the phasing of the site in the 5-year supply. The Council maintains the whole site can be delivered in one phase and has been pushed back to Year 5, allowing time to go through the planning approval process if the current consent is not implemented.	High (E)
LEA SA 02	Blackheath Hill LSIS	63 new homes, all in 5-year supply	Existing site allocation SA45 has detailed planning consent. Was shown as very high in EB15 but revisions to the consent are being sought, so had been reduced to medium. Site has been re-considered and changed to high status as the site has been phased in Year 4, allowing time for the site to go through the planning approval process if the current consent is not implemented.	High (E)
LEA SA 07	Mayfields Hostel, Burnt Ash Road	64 new homes, all in 5-year supply	Proposed site allocation has a lapsed consent so the principle of residential development on this site is supported. Was shown as medium in EB15 but the site is engaging through the Design Review Panel process so has increased to high.	High (F)

			Site was considered for a slower delivery, but has been retained as being delivered in Year 3, allowing time for the site to go through the planning approval process.	
LCA SA 13	PLACE/Ladywell (Former Ladywell Leisure Centre)	175 new homes, with 102 in 5-year supply	Existing site allocation LTC7 has detailed planning consent for 102 units. Part of the site is already completed, with temporary consent to retain existing units at front part of the site. The site is being progressed by the Council. Was shown as high in EB15 but now site has planning consent, so has been increased to very high.	Very high (B)
LCA SA 15	Land at Nightingale Grove and Maythorne Cottages	27 new homes, all in 5-year supply	Existing site allocation SA34 has detailed planning consent. Was shown as high in EB15 but consent covers majority of the site so has been increased to very high. LC10 increased the 5-year supply to align with planning consent.	Very high (B)
LWA SA 09	Willow Way LSIS	210 new homes, with 175 in 5-year supply	Existing site allocation SA48 has planning consent for part of the site. It was granted at appeal. Site is engaging through the Design Review Panel process. Was shown as high in EB15 but a new application is now being sought, so has been reduced to medium. The site has a Statement of Common Ground that seeks a slower delivery of the site, although the Council maintains that the phasing in Year 4 and 5 is appropriate, allowing time to go through the planning approval process if the current consent is not implemented.	Medium (H)
	Catford Timber Yard	52 new homes, all in 5-year supply	This unallocated large site has planning consent. It was granted at appeal. Site has been reconsidered and changed to high status as the consent has not been implemented as yet, but some groundwork has taken place and no evidence has been submitted to the Council to suggest otherwise. Site has been phased in Year 5, allowing time for the site to recover or to go through the planning approval process if the current consent is not implemented.	High (E)
	73 Lewisham High Street	23 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly. No evidence has been submitted to the Council to suggest otherwise.	Very high (B)
	Colfe and Hatcliffe Glebe	22 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	52-54 New Cross Road	35 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	Former Deptford Green Sports Pitch, Edward Street	34 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	34-40 Eastdown Park	21 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	56-60 Farmstead	24 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)

	96a Sydenham Road	10 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly. 10 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (B)
	Regent Business Centre, 291-301 Kirkdale	35 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	Valentine Court	41 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	Green Bank Cottage, Taymount Rise	14 new homes, all in 5-year supply	This unallocated large site has planning consent. LC10 increased the 5-year supply to align with consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	Fairlawn Primary School	12 new homes, all in 5-year supply	This unallocated large site has planning consent. LC10 increased the 5-year supply to align with consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	34 Sydenham Hill	11 new homes, all in 5-year supply	This unallocated large site has recently gained planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	27 Inglemere Road	20 new homes, all in 5-year supply	This unallocated large site has recently gained planning consent. Site capacity is less than 50 units and can be built out swiftly.	Very high (B)
	Waldram Crescent	22 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly. 22 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (B)
	Bampton Estate	39 new homes, all in 5-year supply	This unallocated large site has planning consent. Site capacity is less than 50 units and can be built out swiftly. 39 will no longer be in 5-year supply if start Year 1 of housing land supply in 25/26.	Very high (B)
	Total	2,205 in Years 1-5 sites with consent		

Table A.3: Site has outline consent (c)

Based on #1 Final starting 2425 excl. 450

Site reference	Site name	Residential units	Supporting evidence	Likelihood of being delivered
LNA SA 09	Surrey Canal Triangle MEL (Outline consent only)	3497 new homes, with 300 in 5-year supply	Existing site allocation SSA3 has a resolution to approve for a hybrid application, with outline consent for the whole site and detailed consent for 600 units in Phase 1. Section 106 agreement is due to be signed soon. Was identified as high in EB15 but now the site has a resolution to improve so has been increased to very high. Site is engaging with the Development Management process. Site capacity for the whole of the site including Millwall Football Club land, has been increased from 4089 to 4097, to reflect a slight increase in the consented scheme. Phasing is in line with the Renewals phasing plans and both Statements of Common Ground with Renewal and Millwall Football Club.	Very high (C)
Total		300 in Years 1-5 for outline consents		

Table A.4: Site has a resolution to approve (e i)

Based on #1 Final starting 2425 excl. 450

Site reference	Site name	Residential units	Supporting evidence	Likelihood of being delivered
LCA SA 12	Ladywell Play Tower	33 new homes, all in 5-year supply	Proposed site allocation has planning consent, subject to a section 106. Was shown as very high in EB15 but the site had stalled, so had been reduced to high. Site has been phased in Year 5, allowing time for the site to resume or to go through the planning approval process again.	High (G)
LNA SA 09	Surrey Canal Triangle MEL (detailed consent only)	600 new homes, all in 5-year supply	See Table A.3 above.	Very high (C)
LNA SA 19	Creekside Village East, Thanet Wharf MEL	393 new homes, all in 5-year supply	Existing site allocation SA12 has a resolution to approve for detailed planning consent. Was identified as good in EB15, but now increased to very high. Site has been phased in Year 4 and beyond, allowing time for the site to be delivered.	Very high (C)
LEA SA 03	Leegate Shopping Centre	562 new homes, with 250 in 5-year supply	Existing site allocation SA23 has a resolution to approve for detailed planning consent. Section 106 agreement is due to be signed soon. Site has been re-considered and changed from high to medium as the landowners did not engage in preparing a Statement of Common Ground. LC10 brought forward some of the supply into the 5-year supply but some of the supply (312 units) has subsequently been pushed back beyond the 5-year supply, allowing time for the site to resume or to go through the planning approval process again.	Medium (G)
Total		1,276 in Years 1 – 5 for resolutions to approve		

Table A.5: Site is at application stage (e ii)

Based on #1 Final starting 2425 excl. 450

Site reference	Site name	Residential units	Supporting evidence	Likelihood of being delivered
LSA SA 01	Former Bell Green Gas Holders	262 new homes, all in 5-year supply	<p>The Gas Holders part of the existing site allocation SA26 has a submitted application.</p> <p>The Livesey Memorial Hall part of the site is not likely to be delivered in the first 5 years.</p> <p>The site is engaging with the Development Management process and is engaging through the Design Review Panel process.</p> <p>The site has a Statement of Common Ground that agree the phasing of the site.</p> <p>Site is phased for Year 5, allowing time for the site to go through the planning approval process.</p>	High (D)
LSA SA 08	Land at Pool Court	7 new homes, all in 5-year supply	<p>Proposed site allocation is a submitted application.</p> <p>Was shown as medium in EB15 but now has a submitted application so has increased to high.</p> <p>Site is engaging with the Development Management process.</p> <p>Site is phased for Year 4, allowing time for the site to go through the planning approval process.</p> <p>Site has increased from 6 to 7 pitches, in line with latest knowledge regarding the current capacity of the site.</p>	High (D)
LWA SA 02	6 Mantle Rd	46 new homes, all in 5-year supply	<p>Existing site allocation SA28 is a submitted application.</p> <p>Site is engaging with the Development Management process.</p> <p>LC10 increased the 5-year supply to align with latest pre-app.</p>	High (F)
	Total	315 in Years 1 – 5 for applications		

Table A.6: Site is at pre-application stage (e iii)

Based on #1 Final starting 2425 excl. 450

Site reference	Site name	Residential units	Supporting evidence	Likelihood of being delivered
LCA SA 02	Lewisham Shopping Centre	2,145 new homes, with 369 in 5-year supply	<p>Proposed site allocation is at pre-application stage and is progressing well, with a submitted planning application anticipated soon.</p> <p>Lewisham Shopping Centre part of the site is engaging in the Development Management process and the Design Review Panel process.</p> <p>Was shown as medium in EB15 but progress is being made towards submitting an application, so has been increased to high.</p> <p>Lewisham Shopping Centre part of the site has a Statement of Common Ground that agrees the phasing of the site.</p> <p>LC10 increased the 5-year supply to align with latest pre-app.</p> <p>Lewisham House part of the site is at pre-application stage.</p> <p>The capacity has been increased from 1,579 to 2,145, to reflect the latest discussions at pre-application stage.</p>	High (F)
LCA SA 10	House on the Hill, Slaithewaite Road	52 new homes, all in 5-year supply	<p>Proposed site allocation is at pre-application stage, but is coming forward slower than anticipated.</p> <p>Site is engaging in the Development Management process.</p> <p>Site has been considered through a masterplan.</p> <p>Site was considered for a slower delivery, but has been retained as being delivered in Year 5, allowing time for the site to go through the planning approval process.</p>	High (H)
LCA SA 17	Catford Shopping Centre and Milford Towers	1084 new homes, with 102 in 5-year supply	<p>Proposed site allocation is at pre-application stage, but part of the site is coming forward slower than anticipated.</p> <p>Site is engaging in the Development Management process, especially Thomas Lane Yard.</p> <p>Site has been considered through a masterplan.</p> <p>LC10 has already moved some of the supply back from the 5-year supply.</p> <p>Site has been re-considered and changed to high status, as only 102 units (the part of the site that is progressing at Thomas Lane Yard) remains within the first 5-years.</p> <p>Site has been phased in Year 5 and beyond, allowing time for the site to go through the planning approval process.</p>	High (H)
LNA SA 03	Evelyn Court LSIS	161 new homes, all in 5-year supply	<p>Proposed site allocation is at pre-application stage.</p> <p>Site is engaging with the Development Management process and the Design Review Panel process.</p> <p>Site is phased for Year 5, allowing time for the site to go through the planning approval process.</p> <p>The capacity has been increased from 132 to 161, to reflect the latest discussions at pre-application stage.</p>	High (F)
LNA SA 13	Achilles Street	282 new homes, all in 5-year supply	<p>Proposed site allocation is at pre-application stage.</p> <p>Site is engaging with the Development Management process.</p> <p>Was shown as medium in EB15 but the Council is progressing this site so has been increased to high.</p> <p>LC10 reduced the 5-year supply to align with latest pre-app.</p> <p>Site is phased for Year 4, allowing time for the site to go through the planning approval process.</p>	High (F)

			21 units relating to Dean house has been phased beyond the first 5-years.	
LSA SA 09	Catford Police Station	54 new homes, all in 5-year supply	Proposed site allocation is at pre-application stage. Was shown as medium in EB15 but the site is engaging with the Development Management process so has been increased to high. Site has been considered through a masterplan, i.e. A21 Study. LC10 increased the 5-year supply to align with average densities for the area. Site has a Statement of Common Ground that agrees the phasing of the site.	High (F)
	27 Fordmill Road	59 new homes, all in 5-year supply	This unallocated large site is at pre-application stage. LC10 increased the 5-year supply to align with latest pre-app. Site has been phased in Year 5, allowing time for the site to go through the planning approval process. Site capacity is less than 60 units and can be built out swiftly.	High (F)
	Blundell House, Goodwood Road	72 new homes, all in 5-year supply	This unallocated large site is at pre-application stage. LC10 increased the 5-year supply to align with latest pre-app. Site has been phased in Year 5, allowing time for the site to go through the planning approval process. Site capacity is less than 80 units and can be built out swiftly.	High (F)
	Akwaaba Centre	38 new homes, all in 5-year supply	This unallocated large site is at pre-application stage. LC10 increased the 5-year supply to align with latest pre-app. Site has been phased in Year 5, allowing time for the site to go through the planning approval process. Site capacity is less than 50 units and can be built out swiftly.	High (F)
	Blackheath Station Car Park	45 new homes, all in 5-year supply	This unallocated large site is at pre-application stage. LC10 increased the 5-year supply to align with latest pre-app. Site has been phased in Year 5, allowing time for the site to go through the planning approval process. Site capacity is less than 50 units and can be built out swiftly.	High (F)
	Martin's Yard, Drakefell Yard	71 new homes, all in 5-year supply	This unallocated large site is at pre-application stage. Site has been phased in Year 5, allowing time for the site to go through the planning approval process. Site capacity is less than 80 units and can be built out swiftly.	High (F)
	Taymount Grange	20 new homes, all in 5-year supply	This unallocated large site is at pre-application stage. LC10 increased the 5-year supply to align with latest pre-app. Site has been phased in Year 5, allowing time for the site to go through the planning approval process. Site capacity is less than 50 units and can be built out swiftly.	High (F)
	Total	1,325 in Years 1 – 5 for pre-applications		