



Lewisham Local Plan

Response to Inspectors' Preliminary Matters and Initial Questions

Prepared to inform the Local Plan Examination

February 2024

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Introduction

This paper provides the London Borough of Lewisham's (the Council's) response to the Inspectors' Preliminary Matters and Initial Questions (IN1) that was published on 30th January 2024.

Response to Initial Questions

1. Legal Compliance - the Duty to Cooperate

Inspectors' Question (IQ) 1: Whilst Appendix 1 provides some information of engagement with Duty to Cooperate bodies, is there a record of the meetings/workshops/discussions held in terms of minutes, notes or summaries including who attended, the strategic matter affected and the outcome or actions arising from the meeting?

- 1.1 The Council's records of engagement undertaken through the Duty to Cooperate take the form of working documents. Their content and outputs have been translated into the submitted Duty to Cooperate Statement (PD08).
- 1.2 However, not all of the detailed meeting minutes have been shared or even formally published. The Council acknowledges that not all of the meetings were provided with full minutes. It is highlighted that not every single meeting yielded meaningful content or actions. That is normal. Nevertheless, the Council can demonstrate an iterative process that discharges the Duty. This is set out under the submitted Duty to Cooperate Statement (PD08) and further evidenced by the submitted and emerging Statements of Common Ground (SOCG01 – SOCG09). Critically, the Council highlights that any actions identified through these meetings have been taken forward in partnership and are encapsulated under Section 5 of the Duty to Cooperate Statement (PD08).
- 1.3 The Council suggest that to provide further clarification Appendix 1 serves as an Addendum to the Duty to Cooperate Statement (PD08). A revised version is included as an attachment to the Council's responses. This table expands upon the information in Appendix 1 Tables 1.1 and 1.2 of the Duty to Cooperate Statement (PD08) and provides a sequence of how some of the main DTC bodies have been involved in the preparation of the new Lewisham Local Plan. It has been prepared to show the breadth of the work covered through the Duty to Cooperate and the attempts made to reach out to relevant bodies, whilst focussing on those with the DTC bodies with the most pertinent strategic matters of relevance to the Borough.

IQ2: Appendix 1 identifies a number of organisations where meetings have either not been held or who have not responded to requests for meetings. Can the Council please provide robust evidence of how it has attempted to engage those organisations in the process? It should also set out which strategic matter is affected; whether the

organisation has made formal representations to the Plan; and whether there are any unresolved issues.

We suggest that any additional information provided by the Council could be an addendum to the Duty to Cooperate Statement.

- 1.4 Evidence of engagement undertaken through the Duty to Cooperate is already summarised by the Council under the submitted Duty to Cooperate Statement (PD08) Appendix 1: Consultation and engagement with Duty to Cooperate bodies Tables 1.1 and 1.2. This clearly sets out which bodies were contacted; when they were contacted; whether they provide a response; and whether follow-up attempts at communication were made if no response was received.
- 1.5 The Council suggest that to provide further clarification Appendix 1 serves as an Addendum to the Duty to Cooperate Statement (PD08). It builds upon Tables 1.1 and 1.2 in PD08 and shows if the DTC bodies responded to Regulation 18 consultation, the dates at which we sought to meet them to discuss DTC matters and whether a meeting was held or not. It highlights the DTC bodies that responded to the Regulation 19 consultation and whether or not their comments provided substantial objections to policies within the new Local Plan. It identifies whether or not a Statement of Common Ground is needed, based on the interaction with the DTC body so far, whether they have made substantial objections and whether there are strategic matters to be resolved. It details the date that the Council first initiated contact regarding SOCG and whether any subsequent meetings have been held. The last column recognises if there are outstanding issues to be resolved. Should it be necessary to demonstrate legal compliance further information can be provided for the examination's consideration.
- 1.6 The Council highlights that those organisations that did not respond to requests to engage were followed-up through further chasing communication. Ultimately, in these cases the Council exercised its judgement in determining whether or not to continue in its attempts to engage with these bodies. The evidence set out under Appendix 1 (attached) demonstrates that the Council made, in most cases at least three attempts at making contact and requesting a meeting. The Council's judgement considered known active corporate engagement between the Duty to Cooperate body and the Council. In some cases, for example the approaches to Tandridge District Council, the Council's attempts at engagement had been made to be thorough and comprehensive in responding to the Duty. However, there is no strategic relationship between Lewisham and Tandridge. Appendix 2 (attached) illustrates the relationship between the DTC bodies and the strategic matters of significance to them. Where strategic matters had been clearly raised or identified the Council determined to pursue engagement. Conversely, bodies that did not respond to meeting requests were not pursued on the grounds that there were no or minimal significant strategic matters to pursue – otherwise the Council would have pursued these organisations further.

1.7 Should it be necessary to demonstrate legal compliance, the Council can be supported by an example of contact communication between the Council and a Duty to Cooperate body. The Council request that the Inspectors advise if this is needed.

IQ3: Nine strategic planning matters are set out in Section 5 of the Council's Duty to Cooperate Statement (PD08). Can the Council please clarify how and when these strategic matters were identified?

1.8 An overview of the process followed to identify the nine strategic planning matters is evidenced in Appendix 2 Table of Strategic Matters (attached). This spreadsheet has been derived, in response to this question, from an internal working document. It has been adjusted to encapsulate how the strategic matters have been addressed through the Statements of Common Ground. The Council suggest that this Table serves as an Addendum to the Duty to Cooperate Statement (PD08).

1.9 The second column in Appendix 2 shows that a wide range of strategic issues were identified as being relevant at the local level and perceived as being important to the Local Plan. When grouped together they form nine main strategic matters discussed in the Duty to Cooperate Statement (PD08) plus three ancillary matters (shown in orange text). Matters 10, 11 and 12 became apparent whilst preparing the Statements of Common Ground with surrounding boroughs and development partners.

1.10 A scoping exercise was carried out to determine which Duty to Cooperate Bodies and other organisations it would be most relevant to target our consultation, Statement of Common Ground, and Duty to Cooperate activities towards – as can be seen from the tick marks in Appendix 2. The green cells show where the strategic matters have been covered in the Statements of Common Ground (denoted by a red boundary around the name of the Duty to Cooperate body).

IQ4: The submission documents list indicates 9 Statements of Common Ground (SOCG01-SOCG09). The Council's Duty to Cooperate Statement (PD08) in paragraph 6.2 indicates Statements of Common Ground will be produced with selected bodies.

Could the Council confirm how and why those chosen were selected?

1.11 The Regulation 22 Submission Documents List (November 2023) identifies those specific Statements of Common Ground between the Council and its partners that were at the point of publication either already prepared and published, or as in the case of Network Rail in an advanced state of preparation. The submitted list of Statements is not a definitive list of the work being undertaken with the Council's partners.

1.12 The Council is working with its plan-making, infrastructure, and development industry partners to prepare a suite of Statements of Common Ground that

collectively seek to demonstrate legal compliance, the soundness and conformity with the new Local Plan. These documents will be progressively submitted to the examination for consideration – in advance of the anticipated hearing sessions. They are live documents that identify the areas of agreement, and where necessary divergence, between the partners. They may also identify where modification to the new Local Plan may be considered by the Council, should changes be demonstrably necessary to secure soundness.

- 1.13 The Council has exercised its judgement in determining with which partners it prepares Statements of Common, as is evidenced in Appendix 1 (attached). In doing so, the Council concludes that it is not necessary to prepare Statements with all of its potential partners. For example, the submitted documents include individual Statements between the Council and all of its neighbour local plan-making authorities across South East London. These four partner bodies, alongside the Council, form an established grouping under which shared Duty to Cooperate matters are regularly discussed – including housing and economic growth, infrastructure, and evidence base productions. In effect this grouping of local plan-making authorities functions on a sub-regional basis – below that of the strategic tier falling under the umbrella of the London Plan. The Council highlights that it is a reasonable and logical that Statements be prepared with these partners. Similarly, a Statement between the Council and the Greater London Authority, acting on behalf of the Mayor of London, is in preparation and will be submitted to the examination in due course.
- 1.14 As a further example, the Council has prepared Statements with key external infrastructure delivery partners¹. This is to demonstrate that the new Local Plan's spatial strategy is appropriate, and that necessary strategic infrastructure can be delivered, or in the case of the Bakerloo Line Extension prepared for, during the plan-period. Notably, this includes Thames Water, Transport for London, and Network Rail.
- 1.15 The Council has also prepared Statements with other statutory bodies where they raised issues through the Regulation 18 and/or 19 consultations. This includes the Environment Agency and Historic England.
- 1.16 In addition, the Council is preparing Statements with development industry partners – specifically those that are bringing forward the new Local Plan's site allocations. These will also serve to demonstrate the appropriateness of the spatial strategy, the soundness of the new Plan, and the deliverability and developability of the site allocations. In terms of the latter, it is intended that the Statements will show how the Council and its development industry partners will significantly boost the supply and delivery of new homes through the delivery of the new Local Plan.

¹ Lewisham Council, as a London Borough, is responsible for a range of infrastructure across the Borough.

1.17 Appendix 2 Table of Strategic Matters (attached) identifies a wide range of Duty to Cooperate Bodies and other organisations that have a role or remit that correlates with the strategic matters considered relevant to the new Lewisham Local Plan. Throughout the plan-making process the Council has engaged with at least 28 different organisations. This has comprised targeted consultations and meetings (predominantly over the period January to March 2021, March to April 2023 and July 2023 onwards). These sought to discuss the draft Local Plan and duty to cooperate issues. In some instances, these meetings have led on to the preparation of Statements of Common Ground. However, the Council has not sought to prepare Statements with all of these bodies. In some instances, this is because they did not make comments during the consultations under Regulation 18 and/or 19 consultations. This included Natural England who expressed that they had no comments to make. In other circumstances, Statements have been prepared with more appropriate local level organisation instead. For example, the Council has not prepared a Statement with National Highways, but one has been prepared with Transport for London, who are the organisation responsible for leading the implementation many of the strategic transport improvement schemes across Lewisham.

IQ5: The entry for SOCG09 -Network Rail states 'to be confirmed'. Can the Council provide an indication as to whether or not this will be completed and submitted and if so, when is this likely to be?

1.18 The Council confirms that the Statement with Network Rail will be completed and submitted to the examination. Work on this Statement is at an advanced stage, and it is anticipated that the Council and Network Rail be conclude the sign-off process before the end of March 2024.

1.19 The Council highlights that Statements of Common Ground are live, working documents. Within this context both partners signal the right to prepare a possible further Statement that provides further specific agreement in relation to the Pool Court site allocation. This is because both partners currently have landowning interests in the site allocation. Such a Statement, should it be necessary, would focus upon the delivery of the new Gypsy and Traveller accommodation. It is anticipated that this further Statement may follow once the Council has submitted a planning application for the site allocation.

IQ6: The Duty to Cooperate Statement refers to other Statements of Common Grounds which will be produced with selected bodies. Can the Council set out which Statement of Common Ground will be prepared and a timetable for doing so?

1.20 As set out above (in response to IQ5), the Council is proactively seeking to prepare further Statements with a range of partners, who have an interest and are relevant to the plan-making process. These include the strategic plan-making authority for London, infrastructure delivery partners and the development industry. To help project manage this process and inform the examination the Council has prepared a Table, which sets out the information. This is set out in

Appendix 3 Table of Statements of Common Ground (attached). The Table identifies how far each Statement has progressed to date, with some already being prepared and signed by both parties and others still in preparation. The Council suggest that this Table serve as a further Addendum to the Duty to Cooperate Statement (PD08).

IQ7: The Council's submission letter refers to the issues of non-conformity raised by the Greater London Authority (GLA) in relation to industrial and employment land and the potential for a Statement of Common Ground between the Council and the GLA to address this. It would be helpful if the Statement of Common Ground also identified any other outstanding differences/issues previously raised by the GLA and whether or not these have been resolved.

Can the Council please provide an indication of when the Statement of Common Ground is likely be completed and submitted?

1.21 Following the conclusion of the consultation under Regulation 19, the Council has been in regular dialogue with the Greater London Authority, who are acting on behalf of the Mayor of London. This engagement has been undertaken with the specific objective of resolving the matters raised within their submitted comments. This is inclusive of the stated concerns of general conformity with the London Plan, and the other comments made in the submitted consultation response.

1.22 The output from this engagement will be a Statement of Common Ground between the two partners. This work is at an advanced stage. The Council are intending to share a draft Statement that is based upon the outputs from the engagement between the partners with the Greater London Authority before the end of February 2024. Subject to their agreement, the Council considers it reasonable to conclude that the completed Statement could be submitted to the examination during March 2024. This is set out in Appendix 3 Table of Statements of Common Ground (attached).

IQ8: Paragraph 5.7 of the Duty to Cooperate Statement highlights that the Borough's Local Housing Need (LHN) Figure is significantly higher than the London Plan Housing Target. It goes onto say that the GLA objected to the inclusion of the LHN figure in an earlier version of the Plan. The housing requirement contained in the Plan reflects the London Plan housing target for the Borough; however, this only relates to the first 10 years of the Plan. The Plan rolls forward the London Plan target for the remaining years of the Plan which we address further below.

Is there a record of discussions with the GLA of the options discussed in relation to the housing target beyond the 10 years and how it was decided that rolling forward the current annual target would be the best option?

1.23 For clarity, many London Boroughs have Local Housing Need figures, as calculated through the Government's standard method, that are significantly higher than

that finally identified and allocated through the London Plan. There are a variety of reasons for this factual position, the Council will seek to articulate these through the associated Housing Target Topic Paper.

- 1.24 For further clarity, the Greater London Authority objects to the application of the Local Housing Need figure, as calculated through the Government's standard method, for a variety of reasons. Most notably because London, unlike the remainder of the nation, remains subject to a strategic plan-making tier as provided by the London Plan. It is for the London Plan to set the Local Housing Need figure following an established methodology consistent across the Capital. At the time of their objection, the latest iteration of the London Plan had yet to be adopted. Nevertheless, the Council acknowledged that the London Plan would set Lewisham's Local Housing Need figure and responded accordingly.
- 1.25 It is factually the case the period covered by the new Lewisham Local Plan is not in direct alignment with the London Plan. Namely, that the current London Plan period will end before that covered by the new Local Plan. This is not unusual and is a situation experienced by many London Boroughs – including those that are immediate neighbours to Lewisham.
- 1.26 In response, the Council has sought to take a pragmatic but sound approach of rolling-forward the adopted London Plan Local Housing Need figure for the final years of the plan period. This is explained in further detail in the associated Housing Target Topic Paper.
- 1.27 In advance of the publication of the Pre-submission Draft version of the new Local Plan, the Greater London Authority had not raised this matter in their discussions with the Council. For clarity, the Greater London Authority have subsequently stated to the Council, as part of the partners' on-going engagement, that the comments made in relation to the rolling forward of London Plan set Local Housing Need figure was intended to serve as advice. The comments expressly neither questioned the soundness nor the general conformity of the approach. It is further noted that the Greater London Authority stated to the Council that other London Boroughs have taken same approach and been found sound through examination.

IQ9: Furthermore, have any discussions taken place with adjoining authorities about meeting any unmet housing need arising from the potentially higher LHN figure?

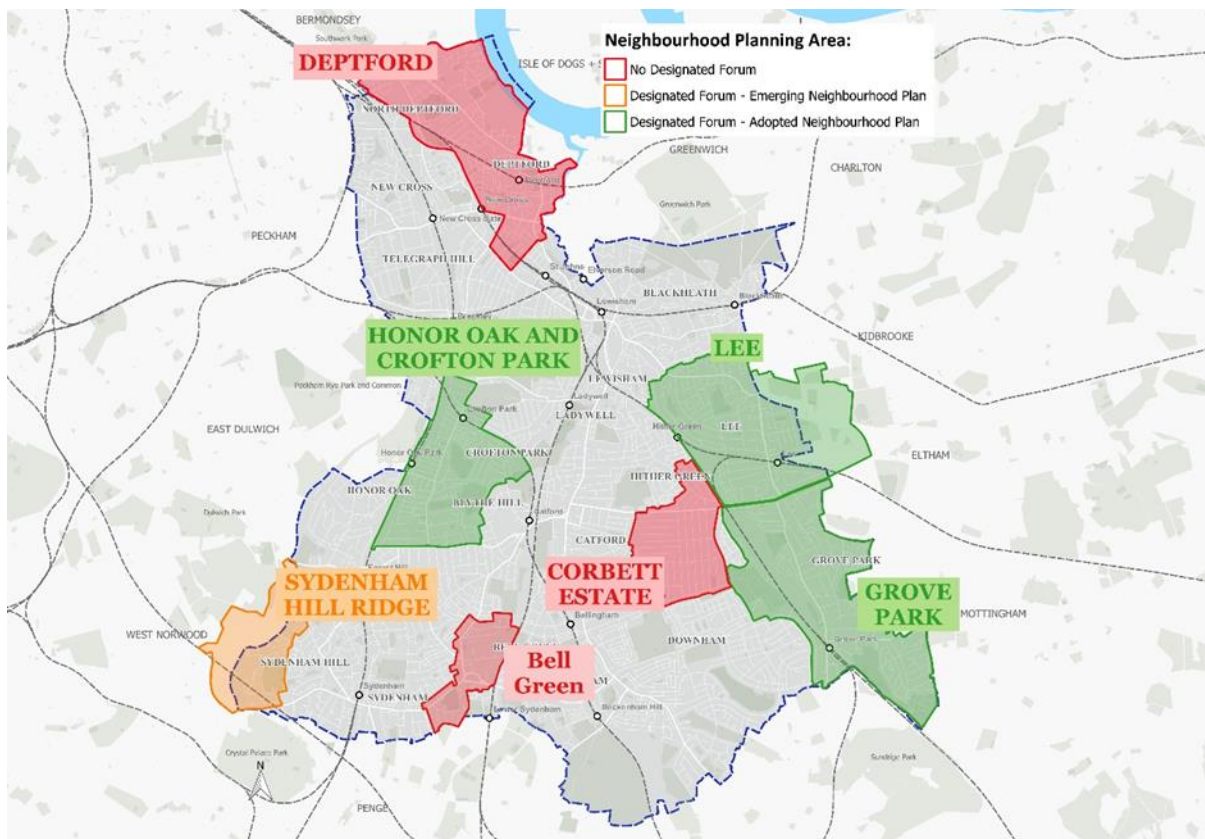
- 1.28 The Council initiated discussions with other local plan-making authorities on the possibility of redistributing potential unmet housing that could theoretically have been generated by the application of a Local Housing Need figure resulting from the Government's standard method. This work was undertaken at an early stage in the Lewisham plan-making process. As stated above, this was prior to the advance of the London Plan target.

1.29 This matter was also discussed in meetings with neighbouring boroughs that took place during Regulation 19 consultation in March 2021 and through discussions when preparing Statements of Common Ground between August and November 2023.

2. Neighbourhood Plans

IQ10: What is the current position of neighbourhood planning within the Borough?

2.1 There has been an active interest in neighbourhood planning in Lewisham since October 2014 when the first Neighbourhood Area was designated. The map shows an overview of the Neighbourhood Planning position across Lewisham.



IQ11: Are there any Neighbourhood Areas currently designated?

2.2 The Borough has seven designated Neighbourhood Areas consisting of Grove Park, Honor Oak Park and Crofton Park, Lee, Sydenham Hill Ridge, Deptford, Corbett Estate and Bell Green. The latter three have no designated forum.

IQ12: Are there any Neighbourhood Plans in preparation within the Borough? If so, what stage have they reached?

2.3 There is only one Neighbourhood Plan currently in preparation. The Sydenham Hill Ridge Forum are in the process of drafting policies for their Neighbourhood Plan. It has yet to reach Regulation 14 consultation.

IQ13: Have any NPs been formally made?

2.4 There are three “made” Neighbourhood Plans in Lewisham. These are Grove Park Neighbourhood Plan, which was made in August 2021; Crofton Park and Honor Oak Park (Hopcroft) Neighbourhood Plan, which was made in May 2022; and the Lee Neighbourhood Plan, which was positively considered by referendum on 15 February 2024.

IQ14: Are there any instances of duplication of NP policies?

2.5 The Council seeks to positively engage in the neighbourhood plan-making process. It has actively sought to ensure that bodies responsible for preparing neighbourhood plans have been fully aware of the emerging new Lewisham Local Plan with the objective of avoiding unnecessary duplication. The Council has taken account of the adopted neighbourhood plans in preparing and producing the new Local Plan. It has also sought to actively engage with the Borough’s neighbourhood forums throughout the plan-making process. This is evidenced through the Spatial Strategy’s area-based approach and the site allocations. Specifically, that the latter are not duplicated within either local or neighbourhood plans.

2.6 Nevertheless, for clarity the Council has sought to identify the instances where Lewisham’s made neighbourhood plans have similar policy objectives.

2.7 The Grove Park Neighbourhood Plan was adopted in September 2021. It includes a neighbourhood plan area spatial strategy. The Neighbourhood Plan includes cross references to national and local plan policy as appropriate throughout its length. It is comprised of policies that cover the following topic areas –

- Heritage
- Grove Park Neighbourhood Centre Regeneration
- Built Environment
- Community Space and Facilities
- Housing
- Local Employment and Enterprise
- Sustainable Transport
- Natural Environment
- Sustainable Healthy Environment
- Site Specific Policies

2.8 Under the above topic headings, the following neighbourhood plan policies are identified as having similar objectives; with the relevant new Lewisham Local Plan policy also identified for the Inspectors' benefit –

- Grove Park Neighbourhood Plan Policy HR1: Conservation and Enhancement of Designated and Non – Designated Heritage Assets, which has similar policy objectives to new Lewisham Local Plan policies set out under the Heritage Chapter 6.
- Policy HR2: Areas of Special Local Character, which has similar objectives to new Local Plan Policy HE3, specific to non-statutory Areas of Special Local Character.
- Policy NC1: Enhancement of Grove Park Neighbourhood Centre and Shopping Parades, which has similar objectives to two policies set out under Economy and Culture Chapter 8. Namely, Policies EC 15 Local Centres and EC 16 Shopping Parades, Corner Shops and Service Points.
- Policy BE2: Design of New Development has similar objectives to the policies found under new Local Plan Chapter 5 High Quality Design.
- Policy CA2: Safeguarding Public Houses is similar to the more expansive new Local Plan Policy EC 19 Public Houses.
- Policies H1 – H3 of the Neighbourhood Plan's Housing Chapter have parallels and similar objectives with a number of related policies set out under the new Local Plan Chapter 5 High Quality Design and Chapter 7 Housing. Most notably in terms of securing high quality and well design new housing and genuinely affordable provision.
- Policies EM 1 and EM2 of the Neighbourhood Plan's Employment focused chapter have some similarities with policies set out in the new Local Plan Chapter 8 Economy and Culture – specifically those relating to smaller scale employment provided through non-designated sites (Policy EC8).
- Policy T2: Promote the Use of Sustainable Vehicular Options, is broadly similar to the objectives sought by the range of policies set out under new Local Plan Chapter 12 Transport and Connectivity – namely, Policies TR 01 and TR03 – TR 06.
- Policy GI1: Grove Park's Green Spaces has similar content and objectives as new Local Plan Policy GR 02 Open Space, which also protects opens spaces in a similar fashion.
- Policy SE1: Incorporation of Climate Adaptation Measures has some similarities, in respect of its overarching objective, to new Local Plan Policy SD01 Responding to the Climate Emergency.
- Policy SE2: Improving Air Quality is similar to new Local Plan Policy SD 06 Improving Air Quality; in the same way that it is similar to London Plan Policy SI 1 Improving air quality.
- Policy SE3: Alleviating Flood Risk is similar to new Local Plan Policy SD 07 Minimising and managing flood risk.

2.9 The Hopcroft Neighbourhood Plan was adopted in May 2022. It includes a section that sets out the wider policy framework/ context for the Crofton Park and Honor Oak Park area. It is comprised of policies that cover the following topic areas –

- Sustainable development
- Housing
- Community facilities
- Local economy and neighbourhood centre
- Neighbourhood centres and parades
- Built environment
- Green infrastructure
- Transport and movement; and
- Health and well-being

2.10 Under the above topic headings, the following neighbourhood plan policies are identified as having similar objectives; with the relevant new Lewisham Local Plan policy also identified for the Inspectors' benefit –

- Hopcroft Neighbourhood Plan Policy E1 Employment Sites and Enterprise seeks to protect Malham Road Local Employment Location (LEL), which is a similar objective to new Local Plan Policy EC 6 Locally Significant Industrial Sites (LSIS), which seeks to protect Malham Road as a LSIS; which is an evolution of the previous LEL designation.
- Policy NC1 Protection and Enhancement of Crofton Park and Honor Oak Park Neighbourhood has a similar objective of protecting (specific) local centres as per new Local Plan Policy EC 15 Local Centres.
- Policy NC2 Protection and Enhancement of Local Neighbourhood Parades has a similar objective of protecting local parades (within the neighbourhood plan area) as per new Local Plan Policy EC 16 Shopping parades, corner shops and other service points.
- Policy BE1 Design of New Development has similar objectives to the policies found under new Local Plan Chapter 5 High Quality Design.
- Policy BE3 Areas of Special Local Character has similar objectives to new Local Plan Policy HE3, specific to non-statutory Areas of Special Local Character.
- Policy GS1 Protecting Green Space and Local Green Space and Policy GS4 Protection of Sites of Importance for Nature Conservation have similar content and objectives as new Local Plan Policy GR 02 Open Space, which also protects open spaces in a similar fashion.
- Policy HW1 Managing Flood Risk is similar to new Local Plan Policy SD 07 Minimising and managing flood risk.
- Policy HW2 Improving Air Quality is similar to new Local Plan Policy SD 06 Improving Air Quality; in the same way that it is similar to London Plan Policy SI 1 Improving air quality.

2.11 Following the above assessment of the above neighbourhood plan policies that display similarities with the content of the new Local Plan, the Council concludes that there are no instances of duplication, in its strictest defined sense. The Council acknowledges that the adopted neighbourhood plans cover a range of policy areas that share similar objectives to those found in the new Local Plan. However, none of these are duplicates of new Local Plan policy content. They are in all cases focused upon the neighbourhood, are consistent and complementary to the higher order policies found in the new Local Plan. The Council highlights that there is no duplication of site allocations between the above adopted neighbourhood plans and the new Local Plan.

2.12 The Lee Neighbourhood Plan was positively considered through referendum on 15 February 2024. This followed an examination process undertaken during 2023. Details of the neighbourhood plan's submission, examination and referendum can be found at

<https://lewisham.gov.uk/myservices/planning/policy/neighbourhood-plans/lee-neighbourhood-forum-and-area>.

2.13 The Lee Neighbourhood Plan is comprised of a neighbourhood spatial strategy, policies, and site allocations. The following neighbourhood plan policies are identified as having similar objectives; with the relevant new Lewisham Local Plan policy also identified for the Inspectors' benefit –

- Policy GB1 Protection and Enhancement of Green Spaces has similar content and objectives as new Local Plan Policy GR 02 Open Space
- Policy GB2 Achieving a Green Infrastructure-led Development Approach has similar content and objectives as new Local Plan Policy GR 03 Biodiversity and access to nature.
- Policy GB4 Protection of Trees and Hedgerows has similar content and objectives as new Local Plan Policy GR5 Urban greening and trees.
- Policy GB5 Managing Flood Risk is similar to new Local Plan Policy SD 07 Minimising and managing flood risk.
- Policy TC2 Improve Measures to Reduce Pollution Levels is similar to new Local Plan Policy SD 06 Improving Air Quality; in the same way that it is similar to London Plan Policy SI 1 Improving air quality.
- Policy BHA1 Protection, Enhancement and Provision of Community Buildings and Policy BHA2 Protection, Enhancement and Provision of Social Infrastructure have similar content to new Local Plan Policy CI1 Safeguarding and securing community infrastructure.
- Policy BHA3 Enhancement of Public Realm Facilities has similarities with new Local Plan Policy QD3 Public realm and connecting places.
- Policy BHA4 Housing Delivery shares some similarities with new Local Plan Policy HO1 Meeting Lewisham's housing needs.

- Policy BHA6 Design of New Development has similar content and objectives to a range of content set out under new Local Plan Chapter 5 High Quality Design.
- Policy SA05 Sainsbury's Site is a neighbourhood plan site allocation that corresponds to the new Local Plan Policy LEA SA 04 Sainsbury's Lee Green.
- Policy SA06 Site at 321-341 Lee High Road SE12 8RU is a neighbourhood plan site allocation that approximately corresponds to the new Local Plan Policy LEA SA 05 Land at Lee High Road and Lee Road; albeit that the latter has a greater red line boundary.
- Policy SA08 Leegate Shopping Centre is a neighbourhood plan site allocation that corresponds with the new Local Plan Policy LEA SA 03 Leegate Shopping Centre.

2.14 As with the other two adopted neighbourhood plans, the Lee Neighbourhood Plan includes policies that cover matters addressed through the new Local Plan. As with the other adopted neighbourhood plans this is considered normal, as many neighbourhood plans typically touch on these issues albeit with a more specific local focus. As above, the content in these cases is complementary to the new Local Plan.

2.15 However, the Lee Neighbourhood Plan shares three site allocations with the new Local Plan – albeit that one of these (Policy SA06) covers a different area. The Council highlighted this to the neighbourhood plan-making process, and this matter is raised within the Statement of Common Ground between Lee Neighbourhood Forum and the Council; and submitted to the neighbourhood plan examination process. Whilst the shared site allocations are superficial duplicates they serve a complimentary role – with the new Local Plan site allocation policies providing a strategic context (particularly in terms of development quantum), whilst the neighbourhood plan site allocations express the local position.

IQ15: How do the policies in the Local Plan consider any made NPs?

2.16 As set out above, in response to IQ14, the Council seeks to positively engage in the neighbourhood plan-making process, with the objective of ensuring that neighbourhood plan-making remains consistent and complementary to higher-order policies at national, strategic (London) and Borough level. The new Lewisham Local Plan includes a clear explanation of the Planning Framework, inclusive of national policy, the London Plan and the documents that comprise the Lewisham Development Plan. This includes clear reference to adopted neighbourhood plans. This is set out under Lewisham Local Plan (PD01) Paragraphs 1.5 – 1.9 and Table 1.1.

2.17 The new Local Plan continues by setting out the context for community involvement and neighbourhood planning under Lewisham Local Plan (PD01) Paragraphs 1.24 and 1.25. The supporting text sets out how the Council will

- positively engage with and support designated neighbourhood forums in the preparation of neighbourhood plans. It clearly states that the new Local Plan is presented in a new format that responds to the strong interest in neighbourhood planning in Lewisham. As an example, the new Local Plan highlights that Part Three (of the new Local Plan – Lewisham’s Neighbourhoods & Places) sets key objectives and priorities for the Borough’s character areas. As such it seeks to provide a useful reference point from which neighbourhood forums, and other community groups, can work to support the Local Plan’s implementation.
- 2.18 The new Local Plan Policy HO 02 Optimising the use of small housing sites, identifies under its Point D that – *“Neighbourhood forums are strongly encouraged to identify locations and allocate sites appropriate for housing development, including small sites, within neighbourhood plans”*. This general reference provides neighbourhood forums with an opportunity, should they wish, to develop their own complimentary policies on this matter. It is highlighted that the made neighbourhood plans have their own complementary policies relating to new housing coming forward on windfall sites.
- 2.19 Continuing, the new Local Plan Policy GR 02 Open Space supporting text Paragraph 10.7 clarifies that Local Green Space is designated in Neighbourhood Plans – albeit being subsequently identified in the Local Plan. Paragraph 10.11 expands by stating that *“The NPPF enables neighbourhood forums to designate Local Green Space through the neighbourhood plan process. Local Green Space is afforded the same level of protection as Green Belt”*. Again, this refers to neighbourhood plans in their totality not in respect of individual adopted plans.
- 2.20 Under the new Local Plan Lewisham East Area Place Principles, at Paragraph 16.13, the supporting text sets out the role that neighbourhood plans could take in helping deliver the objectives of Policy LEA 04 Linear network of green infrastructure. Whilst the new Local Plan Policy LEA 04 does “consider” any specific named adopted neighbourhood plan, it does (again under Paragraph 16.13) identify the places through which the network would pass – including Grove Park.
- 2.21 Finally, the new Local Plan Policy DM 02 Infrastructure funding and planning obligations and its supporting text (under Paragraph 19.9) identifies the role that neighbourhood forums and their plans could play in prioritising the investment of Neighbourhood Community Infrastructure Levy funding.
- 2.22 In conclusion, the individual policies in the new Lewisham Local Plan do not “consider” the three made neighbourhood plan. Nevertheless, the new Local Plan provides a framework that allows neighbourhood plans to provide a complementary and supporting role within the wider Lewisham Development Plan. This approach is considered sound.

IQ16: Are any of the NP policies intended to be superseded by the policies in the Plan?

- 2.23 As previously noted, the Borough's neighbourhood plan policies are focused upon their specific neighbourhood areas, are consistent and complementary to the higher order policies found in the new Local Plan. None of the new Local Plan policies are intended to supersede adopted neighbourhood plan policies. There are no changed circumstances to justify such action.
- 2.24 For further clarification and as noted above, in the response to IQ15, the new Local Plan identifies that national planning policy enables neighbourhood forums to designate Local Green Space through the neighbourhood plan process. This has allowed the made neighbourhood plans to designate Local Green Spaces. The new Local Plan will identify these under Policy GR 02 Open Space. However, this does not constitute the Local Plan superseding neighbourhood plan policy.

IQ17: Does the Local Plan make appropriate reference to the policies and proposals in the made NPs?

- 2.25 The Council's response to IQ15 sets out all of the circumstances where the new Local Plan refers to the opportunities afforded to neighbourhood plans.
- 2.26 The new Local Plan makes no specific references to the made Neighbourhood Plans. The Council could consider modifications to the new Local Plan, to make appropriate references to the made neighbourhood plans, if it were demonstrably necessary to secure its soundness.

3 National Policy

IQ18: A revised version of the NPPF was published on 19/ 20 December 2023. The examination of the Local Plan, having regard to transitional arrangements, will be assessed for consistency in relation to the September 2023 version of the NPPF. However, in the interests of future proofing it is appropriate to consider whether any national policy changes might necessitate modifications to any emerging Plan such as reference to NPPF paragraph numbers etc.

Consequently, will there be a need for any potential modifications in this regard?

- 3.1 The new Lewisham Local Plan makes 49 references to the National Planning Policy Framework (NPPF). Some of these references are generic, whilst others refer to specific paragraphs of the NPPF.
- 3.2 The Council suggests that in the interests of future proofing the specific NPPF references contained in the new Lewisham Local Plan Paragraphs 1.6, 6.30, Table 1.1, footnotes 7, 48, 49, 50, 105, Appendix 2 and Appendix 3 should be removed from the Local Plan.

4 Strategic and Non-Strategic Policies

IQ19: Paragraph 21 of the NPPF (July 2021) requires that Local Plans should make explicit which policies are strategic policies. Footnote 14 states "where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies."

Although Table 20.2 of Appendix 3 of the Plan lists the non-strategic policies, there is no corresponding table to technically provide the list of strategic policies. Overall, the Plan does not presently provide a single list of all policies.

Many plans, often within an introductory section, set out a full list of policies and within the list identify which are strategic policies.

Some plans, go further and choose to insert the word 'strategic' before the policy number for those which are strategic policies.

In any event, Appendix 3 is incorrect and appears not have been updated for the publication version of the Plan as some of the policies listed (QD8 and QD9) do not appear to exist and other policy references (QD12, QD13 and GRS) are incorrect.

The current approach identifies 97 out of 105 policies to be strategic, leaving only 8 policies (after removing the 2 policies that no longer appear to exist) deemed to be non-strategic. At face value, this would appear to be an unusual proportion of strategic policies. This is within the context that paragraph 28 of the Framework establishes that non-strategic policies should be used by local planning authorities to set out more detailed policies for specific areas, neighbourhoods, or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving, and enhancing the natural and historic environment and setting out other development management policies.

Could the Council please provide an explanation of the rationale of how the policies in the Plan were determined to be strategic and non-strategic?

- 4.1 The Council acknowledges that the new Lewisham Local Plan does not include a corresponding table, to Table 20.2 of Appendix 3, that technically provides the list of strategic policies. In addition, it is acknowledged that the new Local Plan currently does not include a single list of all of its policies.
- 4.2 The Council notes the potential approaches identified within Question IQ19, which plan-makers could consider in order to aid readers with their understanding of a plan's policy content, and specifically the differentiation between strategic and non-strategic policy content.
- 4.3 The Council notes and acknowledges the observation that new Local Plan Appendix 3 Table 20.2: Non-strategic policies, contains errors; specifically in identifying policies that are not included in the submitted version of the Plan. By

way of an explanation, the Council suggests that the new Local Plan has been through a number of iterations and had drafting contributions from a number of different Officers.

- 4.4 The Council acknowledges that the new Local Plan may still contain some anomalies, which by themselves are not matters of soundness. In that respect the Council welcomes the Inspectors' help in resolving these anomalies through the examination process.
- 4.5 Within the context of Question IQ19, the Council suggest that changes could be made to the new Local Plan to better identify and differentiate between its strategic and non-strategic policies. This could include the provision of a single list of all of its policies. It would also provide an opportunity to amend the errors contained within Appendix 3 Table 20.2 and any other drafting anomalies that are subsequently identified. The Council proposes that this work could be completed and submitted to the examination before the end of March 2024.

5 Gypsies and Travellers

IQ20: Are there any implications for the content of the Plan and/or the evidence base arising from the revised Planning Policy for Travellers Sites published in December 2023?

In particular, in relation to the revised definition of Gypsies and Travellers following the Court of Appeal judgment in the case of Smith v SSLUHC & Ors [2022] EWCA Civ 1391?

- 5.1 The Council notes that on 19 December 2023 the DLUHC published an update to its policy paper entitled "Planning policy for traveller sites", which revised the original dated 23 March 2012. The Council acknowledges that the latest version of the policy paper has been updated to align with the definition of Gypsies and Travellers (set out in Annex 1) as determined by the Smith judgment (Smith v SSLUHC & Ors) (31 Oct 2022).
- 5.2 It is noted that the website text that accompanies the updated policy paper "Planning policy for traveller sites" (August 2015) states that "Following the judgment in the Court of Appeal in the case of Smith v SSLUHC & Ors, the government is reverting the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012, with this change applying from today (19 December 2023) for plan and decision making. The government intends to review the approach to this area of policy and case law in 2024". It is further noted that the text states that the paper "should be read in conjunction with the National Planning Policy Framework"; which itself was revised and published on 19/20 December 2023. The Council highlights that whilst the revised National Planning Policy Framework (December 2023) sets out relevant interim arrangements for plan-making; specifically in terms of plans that have reached advanced stages of production; the policy paper does not.

- 5.3 Despite the above apparent inconsistency in national guidance the Council considers and responds to the matter raised under IQ20. The new Lewisham Local Plan and its supporting evidence base has been prepared in accordance with the national planning policy and guidance that was published and available throughout its preparation, leading up to pre-submission consultation (March-April 2023); subsequent submission (November 2023) and on-going examination. This is demonstrated throughout the submission documents. In relation to this specific matter the Council refers to the Integrated Impact Assessment (PD04 Paras 9.7.10 and 9.7.11); PAS Local Plan Route Mapper Toolkit (PD16 Key Questions 31 and 32); and the Lewisham Gypsy and Traveller Accommodation Assessment Update (LC2).
- 5.4 Consequently, the Council considers that at publication of the Pre-Submission Draft (March 2023) and subsequent Submission and Examination stage (November 2023), it had sought to meet the evidenced needs of the local Gypsy and Traveller communities through its plan-making. However, the Council acknowledges that from 19 December 2023 the policy paper on this matter now widens the definition for the purposes of this planning policy to include persons of nomadic habit of life who have ceased to travel. The Council acknowledges that this recognition by the policy paper will require further evidence to account for the widened definition, which may result in a different level of need.
- 5.5 Work on assessing the future need for additional Gypsy & Traveller accommodation is progressing across London. This is being undertaken by the London boroughs and the Greater London Authority. Following the original judgement, and considerably in advance of the recent amendment to the “Planning policy for traveller sites”, the Council and its plan-making partners questioned the assessment methodology. As a consequence, this strategic evidence base building is being adjusted to take a full account of the wider lawful definition. This work is already underway, with strategic partners meeting to discuss progress during February 2024.
- 5.6 This is a strategic matter and as such is not in alignment with all of the local plans being prepared by the individual partner authorities. This is not unusual and has many parallels with other evidence gathering, not least the annual publication of population projections, that take place as normal business outside of individual plan-making processes. The Council is aware of many examples of where this occurs. This does not invalidate or question the soundness of the new Local Plan.
- 5.7 As set out above, it is anticipated that the current evidence base building process will provide an assessment of need that is genuinely inclusive of the needs of the Gypsy & Traveller communities across the Capital. It is acknowledged that future technical assessment may identify a different scale of need for Lewisham. Should this be the case, the Council anticipates that any changes in the scale and nature

of need will be addressed through future revisions to the Local Plan in accordance with national planning policy².

- 5.8 The Council highlights that the Greater London Authority has not raised this matter in their comments, neither in terms of general conformity nor soundness. Furthermore, the Lewisham plan-making process has sought to engage with local communities and not received any negative comments on this matter.

6 Town Centres – Retail

IQ21: Policy EC12 criterion F includes a figure for additional 8,400 gross square metres of retail floorspace up to 2035; however, the policy should address need which reflects the Plan period which runs to 2040.

In the Schedule of Proposed Changes to the adopted policies map December 2022 (PD03), in paragraph 4.3 reference is made to a 'Local Centres Topic Paper'.

Where can we find a copy of this document?

- 6.1 Paragraph 4.3 has been incorrectly referenced. It should instead refer to another evidence base document that was submitted alongside the new Lewisham Local Plan – namely EB23 Local Centres Background Paper. The Council suggests that Paragraph 4.3 is amended to reflect the correct reference.
- 6.2 You can find a link to it in the Regulation 22 Submission Documents List (version 2, November 2023) in the Evidence Base Documents > Economy and Culture Section or click here:

<https://lewisham.gov.uk/-/media/reg-19-accessible-local-centres-background-paper-december-2022.ashx>

7 Infrastructure Delivery Plan

IQ22: The submitted Infrastructure Delivery Plan 2023 (IDP) (PD07) was updated in October 2023. Whilst it is acknowledged that this a 'live' document which will be updated annually; from the various tables within each of the infrastructure asset classes, there a number of matters which are still to be confirmed, some of the unknowns are within the early years of the plan period.

Could the Council give an indication of when further detail will be available to help us to assess whether the infrastructure requirements of the Plan are deliverable?

- 7.1 The Council acknowledges that the latest Lewisham Infrastructure Delivery Plan 2023 (PD07) does contain some “unconfirmed” matters. The Council contends that this is a typical situation with “live” documents that seek to assemble

² As set out under NPPF Paragraph 33.

intelligence from a wide variety of partners, some which may be external to the Council, or have a different understanding of the plan-making process. It is contended that this does not invalidate or question the soundness of on-going plan-making and decision-taking associated with the new Lewisham Local Plan.

- 7.2 The Council highlights that many of the perceived “unconfirmed” matters may be explained as being “no-change” – again this is a typical feature of infrastructure planning reporting, particularly in relation to investment projects subject to an extended lead-in, or funding process. Equally, it is highlighted that some projects, whilst desirable, are currently classified as aspirational or in development and consequently detail may not be available.
- 7.3 In order to fully address this matter and aid the examination, the Council propose to contact its internal and external infrastructure partners to secure a current position on the “unconfirmed” matters. The Council will seek to supply the examination with this information by April 2024.

IQ23: Within the IDP there is a hyperlink to the Infrastructure Funding Statement (IFS) which is for the financial year of 2022/2023. Can the Council please give an indication as to when the IFS for 2023/2024 will be available?

- 7.4 The Council publishes the Infrastructure Funding Statement for Lewisham each December, following the end of the monitoring period. This is in accordance with the Community Infrastructure Levy Regulations 2010 (as amended) Paragraph 121A. This requires that CIL authorities publish their infrastructure funding statements “no later than 31st December in each calendar year a contribution receiving authority must publish a document (the annual infrastructure funding statement”. The most recent published Infrastructure Funding Statement for Lewisham, for the reporting period 2022/23 can be found here:

[Lewisham Council - Community infrastructure levy](#)

- 7.5 The next Infrastructure Funding Statement for Lewisham that will cover the reporting period 2023/24 will accordingly be prepared and published in December 2024.

IQ24: The main output from the IDP is an updated Infrastructure Delivery Schedule (IDS). Has this been prepared and, if so, where can we find it, please?

- 7.6 For clarity, the Council has not taken an approach of preparing a single specific Infrastructure Delivery Schedule. Instead, the Lewisham Infrastructure Delivery Plan includes 11 tables interspersed throughout its length. These strategic infrastructure lists are located at the end of each infrastructure asset classes including:

- Page 17 for education and childcare facilities,
- Page 29 for health, care, and emergency service facilities,
- Page 38 for library facilities, archives, and local history,
- Page 46 for sports and recreation facilities,
- Page 50 for youth and community facilities,
- Page 64 for green infrastructure,
- Page 77 for transport infrastructure,
- Page 83 for Energy Networks and Electrical Distribution Upgrade,
- Page 91 for flood risk management infrastructure,
- Page 95 for waste infrastructure,
- Page 99 for digital infrastructure.

7.7 Each strategic infrastructure list provides details of planned provision and its proposed location, project description, project lead and delivery partners, indicative timescales and costs, funding availability and funding gap and prioritisation for each project. The Council contends that this is an appropriate approach to this matter for Lewisham.

8. Modifications

IQ25: The submission documents list includes a Schedule of Modifications (PD11). Can the Council confirm that these have not been subject to any consultation to date? If that is the case, the Examination will be based upon the Submission version of the Plan, with due regard given to the Council's proposed schedule as a supporting document.

If there has been some public consultation, please confirm the dates of the consultation.

The starting point for the Examination is that the Council have submitted a Plan which they consider to be sound, legally compliant, and ready for examination. Nevertheless, we will also consider any changes that have subsequently been suggested by the Council, along with those changes put forward by other parties seeking to amend the Plan.

For us to be able to recommend any Main Modifications, to make the Plan sound/legally compliant, if necessary, the Council must invite us to do so in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

Main Modifications are changes which, either alone or in combination with others, would materially alter the Plan or its policies. Main Modifications must be subject to consultation and in some cases further Sustainability Appraisal and Habitat Regulations Assessments might also be required.

In addition to Main Modifications, there could be Additional Modifications which are changes which do not materially affect the policies in the Plan.

We do not recommend Additional Modifications; the Council is accountable for such changes, and they fall outside the scope of the Examination.

- 8.1 The Council confirms that the submitted Schedule of Modifications (PD11) is a tentative step in identifying both potential main modifications that have been suggested in response to consultation responses made under Regulation 19, and anticipated minor modifications that seek to correct indisputable factual, typographic, and grammatical errors. These have been identified by the Council during the period between the close of the Regulation 19 consultation and subsequent submission under Regulation 21. They have been identified to aid the examination process and are in anticipation of the inevitable future stages in the examination process that will follow the hearing sessions. For these reasons the identified potential modifications have not, at this point, been subject to public consultation. They have been published as part of the submission process.
- 8.2 The Council acknowledges that in its opinion the submitted new Lewisham Local Plan is sound, legally compliant, and ready for examination. The Council will proceed through the examination on this basis. Nevertheless, the Council acknowledges that the examination process will inevitably suggest modifications to the submitted Plan, where they are demonstrably necessary to secure soundness. The Council states that it will continue to work positively and proactively with the Inspectors and with its partners to ensure that the new Local Plan is found sound and adopted in a timely manner.
- 8.3 In this respect, the Council takes this opportunity to formally request that as part of a positive examination process the Inspectors recommend any main modifications, that are demonstrably necessary to make the Plan sound in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).
- 8.4 Finally, the Council acknowledges that any future potential main modifications that are demonstrably necessary to secure soundness may also need to be subject to assessment under the Integrated Impact and Habitat Regulations processes. The Council also acknowledges that any main modifications necessary to secure soundness will be subject to further consultation³ at an appropriate point in the process.

³ In accordance with Procedure Guide for Local Plan Examinations Section 6: Main modifications to the plan



Lewisham Local Plan

Duty to Cooperate Statement

Prepared to inform the Local Plan Examination

Proposed Addendum to Duty to Cooperate Statement 2023 (PD08)

This addendum provides additional evidence as to how the Council has carried out its Duty to Cooperate functions and specifically responds to Inspectors' Preliminary Matters and Initial Questions IQ1, IQ2, IQ3, IQ4 and IQ6.

February 2024

LONDON BOROUGH OF LEWISHAM

Appendix 1: Consultation and Engagement with Duty to Cooperate Bodies

This table expands upon the information in Appendix 1 Tables 1.1 and 1.2 of the Duty to Cooperate Statement (PD 08) and provides a sequence of how some of the main DTC bodies have been involved in the preparation of the new Lewisham Local Plan. This list is not definitive, it has been prepared to show the breadth of the work covered through the Duty to Cooperate and the attempts made to reach out to relevant bodies, whilst focussing on the DTC bodies with the most pertinent strategic matters of relevance to the Borough.

The table focusses specifically on Duty to Cooperate meetings and excludes:

- meetings and correspondence that took place in the early part of Plan preparation, prior to the 2021 Regulation 18 consultation;
- meetings held with private developers, community organisations and other bodies that do not have a Duty to Cooperate remit, throughout the Plan-making process; and
- other meetings held by the wider Strategic Planning team or other Council departments where the main focus of the meeting fell outside of the Duty to Cooperate.

DTC Body	DTC type	Regulation 18 consultation		Regulation 18 DTC discussions			Regulation 19 consultation			SOCG discussions				
		Reg 18 correspondence sent	Reg 18 response received	Requests to engage sent	DTC meeting held	Other correspondence received	Reg 19 correspondence sent	Reg 19 response received	Raised main objections	Is SOCG needed?	First initiated discussions on SOCG	SOCG meeting held	SOCG prepared and signed	Any unresolved issues?
A) DTC bodies where SOCG have been drafted														
London Borough of Bromley	Neighbouring planning authority	15/01/2021	23/04/2021	25/02/2021	Yes, a meeting was held on 17/03/2021 where Erik Nilsen (LBL) and Angela Steward (LBL) met with Ben Johnson, Gill Slater and two other London Boroughs to discuss the Reg 18 Local Plan.	n/a	01/03/2023	26/04/2023	Comments were received but no significant objections were raised	Yes, a SOCG is needed as despite there being no objections at regulation 19, there are strategic matters to discuss with neighbouring planning authorities /South-east London Duty to Cooperate Group.	17/07/2023	Yes, a meeting was held on 17/07/2023 where Karol Jakubczyk (LBL) and Angela Steward (LBL) met with Ben Johnson and three other London Boroughs to discuss whether a joint or individual SOCG would be most appropriate.	Yes, see SOCG01	No
Royal Borough of Greenwich	Neighbouring planning authority	15/01/2021	15/04/2021	25/02/2021	No meeting was held due to resource/ staffing issues at Greenwich	n/a	01/03/2023	No	n/a	Yes, a SOCG is needed as despite there being no objections at regulation 19, there are strategic matters to discuss with neighbouring planning authorities /South-east London Duty	17/07/2023	Yes, a meeting was held on 17/07/2023 where Karol Jakubczyk (LBL) and Angela Steward (LBL) met with Michael Clarkson and three other London Boroughs to discuss	Yes, see SOCG02	No

										to Cooperate Group.		whether a joint or individual SOCG would be most appropriate		
London Borough of Southwark	Neighbouring planning authority	15/01/2021	27/04/2021	25/02/2021	Y, a meeting was held on 17/03/2021 where Erik Nilsen (LBL) and Angela Steward (LBL) met with Juliet Seymour and Freya Cunningham and two other London Boroughs to discuss the Reg 18 Local Plan	n/a	01/03/2023	No	n/a	Yes, a SOCG is needed as despite there being no objections at regulation 19, there are strategic matters to discuss with neighbouring planning authorities /South-east London Duty to Cooperate Group.	17/07/2023	Yes, a meeting was held on 17/07/2023 where Karol Jakubczyk (LBL) and Angela Steward (LBL) met with Alex Philpott and three other London Boroughs to discuss whether a joint or individual SOCG would be most appropriate	Yes, see SOCG03	No
London Borough of Bexley	Neighbouring planning authority	15/01/2021	No	28/10/2021 25/02/2021	Yes, a meeting was held on 17/03/2021 where Erik Nilsen (LBL) and Angela Steward (LBL) met with Alex Csicsek, Jennie Patterson and two other London Boroughs to discuss the Reg 18 Local Plan.	n/a	01/03/2023	18/04/2023	Comments were received but no significant objections were raised	Yes, a SOCG is needed as despite there being no objections at regulation 19, there are strategic matters to discuss with neighbouring planning authorities /South-east London Duty to Cooperate Group.	17/07/2023	Yes, a meeting was held on 17/07/2023 where Karol Jakubczyk (LBL) and Angela Steward (LBL) met with Clare Loops and three other London Boroughs to discuss whether a joint or individual SOCG would be most appropriate.	Yes, see SOCG04	No
Environment Agency	Prescribed body	15/01/2021	12/04/2021	08/03/2021	No response to meeting request	Yes, comments received on 11/04/2021 and 17/11/2021 regarding the Reg 18 Local Plan and Infrastructure Delivery Plan.	01/03/2023	25/04/2023	Comments were received but no significant objections were raised	Yes, a SOCG is needed to address how far the Council has addressed the Environment Agency's concerns.	29/08/2023	No	Yes, see SOCG05	No

Historic England	Prescribed body	15/01/2021	23/04.2021	08/03/2021	No response to meeting request	Yes, comments received on 11/04/2021 regarding Historic Assets and the need for further evidence base work to be completed.	01/03/2023	27/04/2023	Comments were received but no significant objections were raised	Yes, a SOCG is needed to address how far the Council has addressed Historic England's concerns including their request for a Heritage Assessment Background Paper to be prepared.	29/08/2023	No	Yes, see SOCG06	No
Transport for London (TFL)	Prescribed body	15/01/2021	23/03/2021	08/03/2021	Yes, various meetings were held where Erik Nilsen (LBL), David Syme (LBL) and Julia Robins (LBL) met with Chris Porter, Craig Newton and Anne Crane to discuss the Reg 18 Local Plan, South Circular re-alignment, BLE, Lewisham interchange, Bus Garages	n/a	01/03/2023	25/04/2023	Comments were received including some objections relating to a range of policies.	Yes, a SOCG is needed to address how far the Council has addressed the TFL's concerns and seek to ensure necessary strategic infrastructure can be delivered.	07/09/2023		Yes, see SOCG07	No
Thames Water	Other	15/01/2021	12/04/2021	No	n/a	Not pursued at this stage but the importance of SOCG has been recognised as the Plan has progressed.	01/03/2023	24/04/2023	Comments were received but no significant objections were raised	Y, a SOCG is needed to address how far the Council has addressed the Thames Water's concerns and seek to ensure necessary strategic infrastructure can be delivered.	11/10/2023	No	Yes, see SOCG08	No
Mayor of London / Greater London Authority (GLA)	Prescribed body	15/01/2021	23/03/2021	11/04/2021 08/03/2021	Yes, meetings were held between Erik Nilsen (LBL), David Syme (LBL) on:	n/a	01/03/2023 including a letter requesting the Mayor's opinion regarding general conformity	25/04/2023	Comments were received including some objections relating to a range of policies and possible non-	Yes, a SOCG is needed to address how far the Council has addressed the GLA's concerns and addressed the	20/04/2023	Yes, meetings were held on 04/10/2023 07/09/2023 12/07/2023 20/04/2023 with	Still in preparation	Yes, although both parties are working closely to resolve the issue relating to industrial land and ensure

					15/02/2021 Progress catch up, 04/03/2021 Progress catch up, 13/09/2022 Industrial strategy, 30/03/2022 Tall buildings, 08/06/2022 Tall buildings.		with the London Plan		conformity issue relating to industrial land.	issue of possible non-conformity.		Karol Jakubczyk (LBL), Angela Steward (LBL), Hassan Ahmed and Celeste Giusti to discuss Regulation 19 representation, the issue of London Plan conformity and the industrial land evidence base.		general conformity with the London Plan.
Network Rail	Other	15/01/2021	No	No	n/a	Not pursued at this stage but the importance of SOCG has been recognised as the Plan has progressed.	01/03/2023	24/03/2023	Comments were received including some objections relating to mitigating new development against additional train usage.	Yes, a SOCG is needed to address how far the Council has addressed Network Rail's concerns and seek to ensure necessary strategic infrastructure can be delivered.	24/10/2023	Yes, a meeting was held on 24/08/2023 where David Syme (LBL) and Karol Jakubczyk (LBL) met with Craig Hatton to discuss Regulation 19 representations including Pool Court	Still in preparation	Yes, although both parties are working closely to resolve the issue relating to Pool Court
Sport England	Other	15/01/2021	09/04/2021	28/10/2021	Yes, a meeting was held on 21/12/2021 to discuss the Reg 18 Local Plan and IDP.	n/a	01/03/2023	14/04/2023	Comments were received including some objections relating to site allocations.	Yes, a SOCG is needed to address how far the Council has addressed Sport England's concerns.	Still to initiate contact	n/a	Still in the early stages of preparation	
HUDU	Other	15/01/2021	30/04/2021	No	n/a	Not pursued at this stage but the importance of SOCG has been recognised as the Plan has progressed.	01/03/2023	25/04/2023	Comments were received including some objections relating to health infrastructure and Health impact assessments	Yes, a SOCG is needed to address how far the Council has addressed HUDU's concerns.	Still to initiate contact	n/a	Still in the early stages of preparation	

DTC Body	DTC type	Regulation 18 consultation		Regulation 18 DTC discussions			Regulation 19 consultation			SOCG discussions				
		Reg 18 correspondence sent	Reg 18 response received	Requests to engage sent	DTC meeting held	Other correspondence received	Reg 19 correspondence sent	Reg 19 response received	Raised main objections	Is SOCG needed?	First initiated discussions on SOCG	SOCG meeting held	SOCG prepared and signed	Any unresolved issues?
B) DTC bodies that raised significant objections at Regulation 19 but SOCG have not been prepared														
Port of London Authority	Others	15/01/2021	09/04/2021	28/10/2021	Yes, a meeting was held on 16/12/2021 to discuss the Reg 18 Local Plan and IDP.	n/a	01/03/2023	18/04/2023	Comments were received including some objections relating to agent of change and riverside development.	Not needed as the objections raised are adequately addressed in the Local Plan.	n/a	n/a	n/a	n/a
City of Westminster	Planning authority	No	No	No	n/a	n/a	01/03/2023	17/04/2023	Comments were received including a request to join the South East London Joint Waste Planning Group	Not needed as this request will be deal with outside of the Local Plan process.	n/a	n/a	n/a	n/a

DTC Body	DTC type	Regulation 18 consultation		Regulation 18 DTC discussions			Regulation 19 consultation			SOCG discussions				
		Reg 18 correspondence sent	Reg 18 response received	Requests to engage sent	DTC meeting held	Other correspondence received	Reg 19 correspondence sent	Reg 19 response received	Raised main objections	Is SOCG needed?	First initiated discussions on SOCG	SOCG meeting held	SOCG prepared and signed	Any unresolved issues?
C) DTC bodies that did not raise significant objections at Regulation 19 and SOCG have not been prepared														
London Borough of Tower Hamlets	Neighbouring planning authority	15/01/2021	No	08/03/2021	Yes, a meeting was held on 11/05/2021 where Erik Nilsen (LBL) and Angela Steward (LBL) met with Harriett Noall to discuss the Reg 18 Local Plan	A follow up letter was received on 08/06/2021 focussing on housing, employment land and waterfront management	01/03/2023	No	n/a	Not needed as no objections at Regulations 18 and 19 and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
National Grid	Other	15/01/2021	No	08/03/2021	Yes, a meeting was held on 28/03/2022 where Erik Nilsen (LBL) and Michael Nartey (LBL) met with Christopher Johnson and Spencer Jefferies to discuss the Reg 18 Local Plan and the IDP.	n/a	01/03/2023	25/04/2023	Comments were received but no significant objections were raised	Not needed as no objections at Regulations 18 and 19 and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Natural England	Prescribed body	15/01/2021	23/02/2021	11/04/2021 08/03/2021	No response to meeting request	Yes, comments received on 02/12/2021 regarding the Local Plan and any possible strategic concerns.	01/03/2023	13/03/2023	The representation stated they had no comments to make.	Not needed as the response to Regulation 19 stated they had no comments to make and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
The Coal Authority	Prescribed body	15/01/2021	No	No	n/a	n/a	01/03/2023	13/03/2023	The representation stated they had no comments to make	Not needed as the response to Regulation 19 stated they had no comments to make and no strategic matters to be resolved.	n/a	n/a	n/a	n/a

DTC Body	DTC type	Regulation 18 consultation		Regulation 18 DTC discussions			Regulation 19 consultation			SOCG discussions				
		Reg 18 correspondence sent	Reg 18 response received	Requests to engage sent	DTC meeting held	Other correspondence received	Reg 19 correspondence sent	Reg 19 response received	Raised main objections	Is SOCG needed?	First initiated discussions on SOCG	SOCG meeting held	SOCG prepared and signed	Any unresolved issues?
D) DTC bodies that did not make representations at Regulation 19 and where SOCG have not been prepared														
Dartford Borough Council	Planning authority	No	No	10/03/2021	Yes, a meeting was held on 16/03/2021 where Erik Nilsen (LBL) and Angela Steward (LBL) met with Andrea Wright to discuss strategic matters between the two boroughs including whether unmet housing need could be accommodated in Dartford	n/a	01/03/2023	N	n/a	Not needed as no objections raised during Regulations 18 and 19, outcome from the DTC meeting was that Dartford cannot accommodate any unmet housing need and no other strategic matters to be resolved	n/a	n/a	n/a	n/a
Marine Management Organisation	Prescribed body	15/01/2021	No	17/11/2021 11/04/2021 08/03/2021	Yes a meeting was held on 13/01/2022 where Erik Nilsen (LBL) met with Lucinda Robinson to discuss the Reg 18 Local Plan and the South East Marine Plan.	n/a	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19 and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Highways England (National Highways)	Prescribed body	15/01/2021	No	17/11/2021 11/04/2021 08/03/2021	Yes, a meeting was held on 04/02/2022 to discuss the Reg 18 Local Plan and IDP.	n/a	01/03/2023	No	n/a	Not needed as no objections raised at Regulation 18 and 19 and no strategic matters to be resolved. A SOCG with TFL has been prepared instead.	n/a	n/a	n/a	n/a

Lewisham Biodiversity Partnership	Other	15/01/2021	Y	08/03/2021	Yes, a meeting was held on 09/05/2022 where Michael Nartey (LBL), Kenan Hassan (LBL) and Eszther Wainwright-Deri (LBL) met with Mike Keogh to discuss the Reg 18 Local Plan and IDP.	n/a	01/03/2023	No	n/a	Not needed as no objections raised at Regulation 19 and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
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DTC Body	DTC type	Regulation 18 consultation		Regulation 18 DTC discussions			Regulation 19 consultation			SOCG discussions				
		Reg 18 correspondence sent	Reg 18 response received	Requests to engage sent	DTC meeting held	Other correspondence received	Reg 19 correspondence sent	Reg 19 response received	Raised main objections	Is SOCG needed?	First initiated discussions on SOCG	SOCG meeting held	SOCG prepared and signed	Any unresolved issues?
E) DTC bodies that did not make representations at Regulation 19, where no DTC meetings have been held and where SOCG have not been prepared														
Homes England	Prescribed body	15/01/2021	No	28/10/2021 11/04/2021 08/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to housing but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Regulator of Social Housing	Prescribed body	15/01/2021	No	28/10/2021 11/04/2021 08/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to housing but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Local Enterprise Partnership for London	Prescribed body	15/01/2021	No	17/11/2021 28/10/2021 11/04/2021 08/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to economy but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Lewisham Clinical Commissioning Group	Prescribed body	15/01/2021	No	28/10/2021 11/04/2021 08/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to health but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved. A SOCG with HUDU is being prepared instead.	n/a	n/a	n/a	n/a

Civil Aviation Authority	Prescribed body	15/01/2021	No	14/01/2022 28/10/2021 11/04/2021 08/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18 and no strategic matters of significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Office of Rail Regulation	Prescribed body	15/01/2021	No	28/10/2021 11/04/2021 08/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to transport but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved. A SOCG with Network Rail is being prepared instead.	n/a	n/a	n/a	n/a
Sevenoaks District Council	Planning authority	No	No	10/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to housing but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved.	n/a	n/a	n/a	n/a
Tandridge District Council	Planning authority	No	No	10/03/2021	No response to meeting request	Not pursued as no objections raised at Regulation 18. Strategic matters relating to housing but only of minimal significance.	01/03/2023	No	n/a	Not needed as no objections raised during Regulations 18 and 19, no response to meeting requests and no strategic matters to be resolved.	n/a	n/a	n/a	n/a

Appendix 2: Table of Strategic Matters

Strategic matter	Strategic matters for Lewisham to deal with in respective SoCG		London Borough of Southwark	Royal Borough of Greenwich	London Borough of Bexley	London Borough of Bromley	Greater London Authority (GLA)	Transport for London (TfL)	The Environment Agency	Historic England	Network Rail	Thames Water	Sport England	Healthy Urban Development Unit (HUDU)	Development partners - 5YHLS	Development partners - other	London Borough of Tower Hamlets	Sevenoaks District Council	Dartford District Council	Tandridge District Council	London Borough of Westminster	Natural England	Marine Management Organisation	Homes England/Regulator of Social Housing	Local Economic Action Partnership	Integrated Care Board (ICB)	NHS Commissioning Board	Civil Aviation Authority	National Highways	Office of Road and Rail	Port of London Authority (PLA)	Local Biodiversity Partnership	London Wildlife Trust	Greenspace Information for Greater London (GIGL)	Education Providers	Utility Companies / National Grid					
	✓	Potential strategic matter																																							
	✓	Strategic matter has been addressed in signed SOCG																																							
	↑	Modifications suggested by DTC body																																							
1. Housing																																									
a. Housing need and land availability	Meeting/exceeding housing requirements.		✓	✓	✓	✓	✓																																		
	Not accommodate unmet need.		✓	✓		✓												✓	✓	✓	✓				✓																
b. Gypsy and traveller accommodation	Meeting gypsy and traveller needs.		✓	✓		✓	✓																																		
	Not accommodate unmet need.		✓	✓		✓																																			
	Gypsy and traveller accommodation at Pool Court.										✓																														
2. Economy																																									
a. Industrial land management	Deliver employment designations.				✓	✓																			✓																
	Meeting London Plan policy E5 (B).			✓		✓																																			
	Redeveloping Bermondsey Dive Under.						✓				✓																														
b. Town centres	Quantum of retail does not compromise beyond borough boundary.		✓	✓		✓	✓																		✓																
c. Opportunity Areas	Deliver growth in Opportunity Areas including Surrey Canal Road SIL and Old Kent Road.		✓	✓		✓	✓	✓				✓													✓																
	Transformative growth along the BLE route including new town centre at Bell Green/Lower Sydenham.		✓			✓	✓	✓				✓													✓																
3. Design and Character																																									
a. Historic environment	Avoid adverse impacts on heritage assets and local character.		✓	✓		✓	✓																																		
	Future growth is character-led.									✓																															
b. Tall buildings and view management	Avoid adverse impacts from tall buildings on views.		✓	✓		✓	✓											✓																							
	Enhance QD4 and EC11.									↑																															
c. World Heritage Site	Protect Blackheath World Heritage Site.			✓			✓																																		
4. Natural environment																																									
a. Green/blue infrastructure	Avoid adverse impacts on green infrastructure, MOL, SINC, LNRs, protected trees, Green Chain Walk.		✓	✓	✓	✓	✓				✓												✓													✓	✓	✓			
	Promote green grid links including cross boundary walking/cycling routes including along River Thames and Deptford Creekside.		✓	✓		✓	✓	✓	✓		✓												✓				✓	✓								✓	✓	✓			
	Deliver sustainable growth and environmental protection.								✓			✓											✓	✓													✓	✓	✓		✓
	Maximise Biodiversity Net Gain.								✓															✓														✓	✓	✓	
b. Water management	Avoid adverse impacts on the river network.		✓	✓		✓												✓					✓	✓												✓	✓	✓			
	Implement Thames Policy Area.		✓	✓			✓		✓			✓						✓						✓																	
	Liaise on Sequential and Exceptions Tests and water infrastructure evidence.								✓			✓																													
	Infrastructure Delivery Plan.										✓	✓																													

Strategic matter	Strategic matters for Lewisham to deal with in respective SoCG		London Borough of Southwark	Royal Borough of Greenwich	London Borough of Bexley	London Borough of Bromley	Greater London Authority (GLA)	Transport for London (TfL)	The Environment Agency	Historic England	Network Rail	Thames Water	Sport England	Healthy Urban Development Unit (HUDU)	Development partners - 5YHLS	Development partners - other	London Borough of Tower Hamlets	Sevenoaks District Council	Dartford District Council	Tandridge District Council	London Borough of Westminster	Natural England	Marine Management Organisation	Homes England/Regulator of Social Housing	Local Economic Action Partnership	Integrated Care Board (CCG)	NHS Commissioning Board	Civil Aviation Authority	National Highways	Office of Road and Rail	Port of London Authority (PLA)	Local Biodiversity Partnership	London Wildlife Trust	Greenspace Information for Greater London (GiGL)	Education Providers	Utility Companies / National Grid	
	✓	Potential strategic matter																																			
	⬆	Strategic matter has been addressed in signed SOCG																																			
⬆	Modifications suggested by DTC body																																				
5. Community (social) infrastructure - health																																					
a. Health infrastructure planning	Health facilities to meet needs and mitigate adverse impacts.	✓	✓		✓								✓	✓											✓	✓											
6. Community (social) infrastructure - education																																					
a. Education infrastructure planning	Education facilities to meet needs and mitigate adverse impacts.	✓	✓		✓																															✓	
7. Community (social) infrastructure - sport and recreation																																					
a. Sport and recreation infrastructure planning	Leisure facilities to meet needs and mitigate adverse impacts.	✓	✓		✓								✓	✓											✓	✓											
8. Transport and Movement																																					
a. Strategic transport network	Avoid adverse impacts from/on transport infrastructure.	✓	✓		✓			✓																													
	Coordinated movement on strategic routes e.g. A21.				✓			✓																													
	S106 contributions to mitigate additional transport usage.																																				
	Partners to secure investment for transport improvements.							✓	✓																												
b. Bakerloo Line Extension	Support/do not prejudice the delivery of the BLE.	✓					✓	✓																													
	Minimise construction impacts from the BLE.	✓						✓																													
c. South Circular	Delivering the South Circular realignment.						✓	✓																													
d. Rail	Improvements to rail stations including Lewisham station.						✓																														
	Do not compromise Network Rail's access to railways.																																				
e. Parking	Enhance TR4 through modifications.																																				
9. Waste management																																					
a. Waste management	South East London Joint Waste Planning Group / Joint Waste Technical Paper.	✓	✓	✓	✓																																✓
	London Waste Planning Group.						✓		✓																												
10. Duty to Cooperate Group																																					
a. SELDTC Group	SEL DTC Group.	✓	✓	✓	✓																																
	Share evidence base / emerging policy	✓	✓		✓																																
11. Neighbourhood Planning																																					
a. Neighbourhood plans	Work on neighbourhood planning where span borough boundaries.	✓	✓		✓																																
12. Development Sites																																					
a. Site deliverability	Principle of development of the site.														✓	✓																					
	Indicative site capacities.														✓	✓																					
	Support spatial strategy and development management.														✓	✓																					
	Development requirements and guidelines.														✓	✓																					
	Indicative timeframe for delivery.														✓	✓																					
	Secure delivery within years 1-5.														✓																						

Appendix 3: Table of Statements of Common Ground

SOCG number	Partner	SOCG not yet started	Initial contact with partner	Preparation of draft SOCG	Discussions with partner	SOCG completed	Date SOCG signed	Anticipated date of completion
SOCG01	London Borough of Bromley		✓	✓	✓	✓	✓	October 2023
SOCG02	Royal Borough of Greenwich		✓	✓	✓	✓	✓	November 2023
SOCG03	London Borough of Southwark		✓	✓	✓	✓	✓	October 2023
SOCG04	London Borough of Bexley		✓	✓	✓	✓	✓	November 2023
SOCG05	Environment Agency		✓	✓	✓	✓	✓	October 2023
SOCG06	Historic England		✓	✓	✓	✓	✓	October 2023
SOCG07	Transport for London		✓	✓	✓	✓	✓	November 2023
SOCG08	Thames Water		✓	✓	✓	✓	✓	November 2023
SOCG09	Network Rail		✓	✓	✓			March 2024
SOCG10	Sport England		✓					April 2024
SOCG11	HUDU		✓					April 2024
SOCG12	Transport for London (2)		✓					April 2024
SOCG13	Greater London Authority		✓	✓	✓			March 2024
Various	Development Partners – 5YHLS		✓	✓	✓			April 2024
Various	Development Partners – beyond 5 years		✓	✓				April 2024