

Lewisham Local Plan: Statement of Common Ground between London Borough of Lewisham and Healthy Urban Development Unit (HUDU) Submission Stage (Regulation 22)

April 2024

1. Introduction

- 1.1. This is a Statement of Common Ground (SoCG) that sets out details of the joint working and cooperation that has taken place, and the future cooperation that is required, between Lewisham Council and the NHS London Healthy Urban Development Unit (HUDU) on behalf of NHS South East London Integrated Care Board (ICB) throughout the preparation of Lewisham's new Local Plan.
- 1.2. To date, Lewisham Council has consulted on:
 - the preferred options of the Local Plan through the Regulation 18 consultation during January and April 2021, and
 - the publication draft of the Local Plan through the Regulation 19 consultation during March and April 2023.
- 1.3. At each stage of the plan making process Lewisham Council has prepared a range of evidence base documents and published them on Lewisham Council's website. These have informed the policies within the new Local Plan.
- 1.4. Lewisham Council submitted the new Local Plan to the Secretary of State and the Planning Inspectorate in November 2023.

2. Relevant Bodies and Strategic Geography

- 2.1. The two relevant parties for the purpose of this SoCG are London Borough of Lewisham and the NHS London Healthy Urban Development Unit.
- 2.2. The council works closely and in partnership with HUDU and the NHS South East London Integrated Care Board (ICB), formerly the Clinical Commissioning Group (CCG) across its corporate service areas, including the planning service. Under the Health and Social Care Act 2012, Health and Wellbeing Boards were set up to improve integration between practitioners in local health care, social care, public health and related public services.

Lewisham

- 2.3. Located in south-east London, Lewisham is an inner London Borough bordered by Boroughs of Bromley, Greenwich and Southwark and the River Thames – as shown in Map 1.
- 2.4. Health and care services in the Borough are provided through a network of local GP practices, Lewisham & Greenwich NHS Trust (LGT) (acute and community services from health centres), South London & Maudsley NHS Foundation Trust (mental health services). Specialist hospital services are provided through Guy's & St Thomas' NHS Foundation Trust and King's College NHS Foundation Trust.



Map 1: The London Borough of Lewisham

NHS London Healthy Urban Development Unit

- 2.5. The London Healthy Urban Development Unit (HUDU) helps the NHS engage and respond proactively to population growth and change in London and to maximise the opportunities that aligning the health and planning agendas can bring to improve health and narrow health inequalities. HUDU work proactively on behalf of the NHS across London to identify and capitalise on opportunities as well as working closely with individual primary care and other organisations to:
- promote healthy communities,
 - plan healthcare infrastructure needs at both a strategic and local level,
 - ensure that planning policies consider healthcare needs and wellbeing of the local population,
 - ensure healthcare plans are integrated with other plans,
 - respond to individual planning applications and proposals,
 - assess the health aspects and implications of planning proposals,
 - secure developer contributions for new health facilities using the HUDU model – including cash and “in kind” contributions,
 - respond to individual planning applications and proposals,
 - make the best use of available evidence and good practice.

3. Key Strategic Matters

- 3.1. The London Plan directs boroughs to work with Clinical Commissioning Groups (CCGs) and other health organisations to identify and plan for health care needs and facilities in their area. The London Plan refers to four broad types of health infrastructure: primary care, community healthcare, acute provision, and specialist provision.
- 3.2. To inform the preparation of the Local Plan, the council has maintained regular liaison with these bodies, particularly on updating the Infrastructure Delivery Plan. This has helped to ensure that work on the estates strategy for primary and community 23 healthcare facilities are reflected in the IDP, with further site specific provisions included in the Local Plan.

- 3.3. Lewisham’s new Local Plan seeks to address a number of key strategic matters. Each is considered in turn. The SoCG identifies where there are specific areas of joint working or cooperation. The parties agree to work together through several actions, which are detailed as records of agreement. Where relevant, this SoCG also highlights where agreement on key strategic matters have not, as yet, been reached.
- 3.4. HUDU have sought clarification around the projected levels of growth in Lewisham and the spatial distribution of this throughout the Borough. This information is vital to informing the NHS estate management strategy and service improvement strategies. The council has engaged proactively with the Lewisham ICB and London HUDU to provide the latest position on population growth and the emerging spatial strategy, both prior to and following the Regulation 18 consultation on the new Local Plan. Feedback from these partners have been used to inform the IDP.
- 3.5. The NHS representations on the Regulation 18 draft Local Plan were supportive of the plan’s renewed emphasis on health and well-being. The need for Health Impact Assessments (HIA) to inform the development management process was flagged. The Regulation 19 Local Plan has been amended to include a new requirement on HIAs for certain types of development. A further request was made for the HUDU Planning Obligations Model to be used as a basis for negotiating planning contributions. This will be addressed in a future update to the council’s Planning Obligations guidance.
- 3.6. In their Regulation 19 Consultation representations, HUDU were pleased to note that the proposed amendments to the Regulation 18 Local Plan have been taken on board and incorporated into the new Local Plan. This includes the introduction of new Policy DM6 Health Impact Assessments, the inclusion of the additional clause covering public safety within Policy QD4 Tall Buildings, amendments to QD7 Amenity and Agent of Change, and adding reference to emergency vehicles in Policy TR5 Deliveries, servicing, and construction.
- 3.7. In their Regulation 19 consultation representations, HUDU raised concerns that if additional weight is to be given to those areas within the IDP then the Council must ensure that this is kept up to date. The current IDP, dated September 2022, relies on evidence gathered prior to this. The Council is in the process of formalising arrangements with its internal and external partners to ensure that there is a formalised mechanism for annually reviewing the Infrastructure Delivery Plan. This will provide a regularised process for partners to update the Infrastructure Delivery Plan.
- 4.5 **Record of agreement:**
- A1) Both parties are in agreement that the new Local Plan:**
- acknowledges the importance of future growth to support health services and build healthy communities;
 - provides detail on health infrastructure across a broad range of relevant policy areas.
- A2) Both parties are committed to ensuring that proportionate and appropriate investment is directed towards the Borough’s health facilities in support of growth.**
- A3) Both parties will continue to communicate in a collaborative manner and engage with each other through 1-2-1 meetings, informal telephone and email correspondence and statutory consultation exercises.**
- A4) The Council will continue to engage with HUDU to identify and plan for health care provision to meet local needs through the Infrastructure Delivery Plan and a forthcoming review of the Planning Obligations SPD.**

4. Community Infrastructure

4.1. Matters raised by HUDU during the Regulation 19 consultation with regards to Community Infrastructure are detailed below:

HUDU Regulation 19 Consultation Comment	Council Response
<p>In HUDU’s response to the Council’s Regulation 18 consultation they requested that the reference is expanded to social and community infrastructure. Social infrastructure is the terminology widely used in the London Plan and other strategic policy documents. We note this broader term is included within the Council’s draft Plan under Policy DM2 Infrastructure Funding and Planning Obligations. Therefore, for greater consistency with the London Plan and to aid clarity and ease of understanding it would appear sensible to use social and community infrastructure in all policy wording throughout the Plan.</p> <p>HUDU raised concerns that the requirement under London Plan Policy S1 for boroughs to undertake an assessment of social needs had not been fully met. While additional evidence has been undertaken in relation to local and town centres there appears not to have been any undertaken in relation to social and community infrastructure. Ideally this would be in place for the submission draft plan, and if not as soon as possible. This is important to ensure the rapid and largescale development in the borough is accompanied not only by sufficient health and education infrastructure but also by the local community infrastructure which is vital to health and wellbeing of individuals and communities. The increase in specialist housing, whether primarily for the young with student housing, and co-living or for older residents through extra care also adds to the importance of offering both formal and informal spaces where communities can come together, and different communities can interact to support community cohesion and reduce social isolation. HUDU are keen to contribute to this work alongside the Council and key stakeholder including the community and voluntary sector.</p> <p>Reference is made to the IDP, however, the IDP does not detail the range of local infrastructure within the voluntary and community sector, and the informal meeting places which are made possible through the design of open space and the public realm where social interaction is encouraged and supported.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy CI 01 Safeguarding and securing community infrastructure.</p> <p>The Council has considered the proposed amendment to introduce the term “social and community infrastructure”. The Council concludes that this is unnecessary to ensure soundness. The Council considers that the new Local Plan wording is already clear in respect of what is meant by the existing term “community infrastructure” – see supporting text Paragraph 9.1.</p> <p>The Council has sought to work positively with its infrastructure partners to identify the investment required to support the scale and nature of growth identified through the new Local Plan. That investment is translated into the Boroughwide Infrastructure Delivery Plan, which identifies and prioritises the necessary specific schemes. The schemes identified through this process cover the full range of infrastructure investment – including green infrastructure, open space and other improvements that positively contribute towards securing the health and well-being of residents and communities.</p> <p>The new Local Plan also contains planning policies that seek to protect and enhance the “other” community infrastructure assets alluded to within the representation. These include policies that address public houses, town centre uses and cultural facilities – all of which contribute towards health and well-being. The Council considers this to be sound approach.</p>

4.2. Record of Agreement

A5) HUDU is broadly supportive of the Community Infrastructure Policies with the new Local Plan.

A6) Both parties will continue working collaboratively to improve Community Infrastructure across the borough and implement policies in relation to the London Plan.

5. Monitoring and Review

5.1. Matters raised by HUDU during the Regulation 19 consultation with regards to Monitoring and Review are detailed below:

HUDU Regulation 19 Consultation Comment	Council Response
<p>HUDU welcome the expansion of the monitoring indicators now under DM7 Monitoring and Review Table 19.1. However, how the reduction in health inequalities is measured should be more detailed. Paragraphs 28-29 of the draft plan highlight key indicators of deprivation and inequalities and it could be appropriate to use one or more of these and record spatial differences as the objective of reducing inequalities will require the Council to understand the impact of the plan on different neighbourhoods. It would also be helpful for indicators to include targets so that progress against these can be kept under review rather than simply a number for many individual indicators.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 07 Monitoring and Review.</p> <p>The Council acknowledges and understands why the respondent considers it desirable for the new Local Plan to undertake more thorough monitoring of health inequalities. However, the Council upon consideration concludes that the current extent of performance indicators is proportionate and appropriate for the new Local Plan. The Council, as part of the annual Authority Monitoring Report process, monitors a wide range of relevant indicators that assess the improvements secured through sustainable development. These include access to open space; natural environments/ green infrastructure; and management of potentially harmful uses (such as A5 food takeaways). The Council considers this to be proportionate and sound.</p> <p>In parallel the Council also monitors the delivery of necessary infrastructure through the Infrastructure Delivery Plan and the associated Infrastructure Funding Schedule. The former continues to be an ideal vehicle for infrastructure delivery partners to identify necessary interventions and investments during the life of the plan.</p> <p>The Council considers that its infrastructure partners will have greater access to and understanding of detailed performance indicators, and the necessary interventions that these may trigger. Consequently, they will be better placed to identify infrastructure network opportunities, which can be brought forward through the Infrastructure Delivery Plan and/ or the Local Plan. The Council encourages its infrastructure partners to continue working positively with these processes. The Council</p>

	considers this to be a sound approach to this matter.
While we very much welcome the inclusion of the Policy DM6 Health Impact Assessments policy we suggest additional wording to ensure the health benefits set out in HIAs and the minimisation and mitigation of potential adverse impacts are secured. Reference as in other policies to use of planning conditions or obligations should be incorporated. This will help ensure the health and wellbeing elements are delivered as part of the overall scheme.	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 06 Health Impact Assessments.</p> <p>The Council notes that the new Local Plan must be read and considered in its entirety. This matter is already addressed through the new Local Plan Policy CI 1 Safeguarding and securing community infrastructure, which provides the link between new growth, the infrastructure that is necessary to support it, and the mechanisms for securing developer contributions to deliver investment. The council considers this a sound approach to this matter.</p>
DM2 Infrastructure funding and planning obligations policy references social and community infrastructure which is welcomed as it provides consistency with London and other strategic policy and captures the full scope of infrastructure supporting local residents and the wider community. If this phrase is used in the policy then providing examples including health infrastructure (primary, community, mental health and acute) within the explanation would be welcomed, or alternatively health infrastructure could be listed as a specific line in the policy.	<p>The Council notes the comments and welcomes the broad support offered in relation to the new Local Plan Policy DM2 Infrastructure funding and planning obligations. The Council notes the suggested addition and could consider a modification to refer to health infrastructure through the main modification process.</p> <p>Subject to it being considered necessary to ensure soundness, the Council will consider a modification to the new Local Plan Policy DM2 Infrastructure Funding and Planning Obligations – “E. The following is a list of areas where planning obligations may be sought, recognising that other types of obligations may be necessary depending on the nature of a proposal and individual site circumstances: f. Community and social infrastructure (including health infrastructure)”</p>

5.2. Record of agreement:

A7) The Council agrees to consider modifications to the plan in response to HUDU’s recommendations, which may be necessary to provide further clarity to Policy DM 02.

6. Site Allocations

- 6.1. NHS Property Services made Call for Sites submissions through the early stages of the plan-making process. Several of these sites have been included in the Local Plan. These will provide for the appropriate re-provision and improvement of health care facilities in new mixed-use schemes, linked to the NHS estate strategy.
- 6.2. **Leegate Centre:** HUDU raised concerns that this allocation includes provision of a health facility; however, it is important that if this is to be included within the allocation that further detail is included to reflect that the requirement for health would incorporate ground floor accommodation with access for emergency vehicles, blue badge and other parking for frail patients provided on an affordable and sustainable basis.
- 6.3. The Council recognises that the current planning application (DC/22/126997) does include a health facility on this site.

6.4. **Sydenham Hill Group Practice and Jenner Health Centre:** HUDU support the site allocations for Sydenham Green Group Practice and Jenner Health Centre. As the SELCCG and wide health sector review future needs in light of the challenges of the pandemic, the recently established Primary Care Networks and the South East London Integrated Care System (ISC) ongoing discussion with the Council is welcomed. This will include identifying areas where additional or expanded capacity is required, and where existing facilities may need to change to provide modern affordable facilities.

6.5. **Record of Agreement**



A8) The Council will work with HUDU to mitigate the impact of development where there is demonstrable need for funding for a new health facilities to meet the needs of new residents.A8) Both parties agree that the Council will consult with HUDU as a statutory consultee on all planning applications which may impact on the health infrastructure or services to ensure there are no adverse impacts on health facilities.

7. Governance agreements

7.1. SoCG need to be prepared and then maintained on an ongoing basis; and be made publicly available to allow transparency. This SoCG is a live document, to be reviewed and updated regularly so that it reflects the most up-to-date position in terms of joint working, especially whenever agreements on outstanding matters have been reached and where progress in addressing strategic cross boundary matters is achieved.

8. Signatories

- 8.1. The signatories below confirm that this is an accurate record of the strategic matters requiring cooperation between the London Borough of Lewisham and HUDU. When signing this SoCG:
- The Planning Policy Manager (or equivalent) is the lead Officer responsible for managing the SoCG,
 - The Director of Planning (or equivalent) is responsible for signing off the SoCG.

Organisation	Name	Position	Signature	Date
London Borough of Lewisham	Nick Fenwick	Director of Planning		14 th June 2024
NHS London Healthy Urban Development Unit (HUDU)	Mary Manuel	Head of the NHS London Healthy Urban Development Unit		14 th June 2024