
Lewisham Local Plan IIA: Second note on reasonable alternatives

Introduction

AECOM is leading on the Integrated Impact Assessment (IIA) process that is being undertaken alongside preparation of the Lewisham Local Plan. The aim of this IIA Note is to respond to the following request set out within the Inspectors' Post Hearings Letter of 8th November 2024:

"The Council has provided some of the information required by AP3 in relation to the process by which spatial strategy options were discounted and selected (LP44A). The commentary set out in Annex A of LP44A in relation to the selection of the preferred option acknowledges that the reasons given in Section 7 of the IIA were brief. It also concludes that with hindsight Section 7 could have set out a more systematic response to the appraisal. However, despite this acknowledgement, the commentary fails to expand on the reasons for the selection of the preferred option or why the option of supporting higher growth at Catford was discounted. We, therefore, require greater detail to address these omissions. Once this has been provided to our satisfaction, the information should be incorporated into a revised IIA which will be consulted upon alongside the MMs."

Expanding on Section 7 within the IIA Report

Section 7 within the IIA Report presented the Council's response to the appraisal of reasonable alternative growth scenarios presented in preceding Section 6. The summary appraisal matrix from Section 6 of the IIA Report is shown below, in order to provide context.

Under a BLE Phase 2 scenario there is clarity on the reasons / justification for supporting high growth at Lower Sydenham and Bell Green, i.e. Scenario 6. However, and as stated by the Inspectors in their Post Hearings Letter, there is less clarity on reasons for not supporting higher growth at Catford under either a scenario whereby the BLE is not delivered ('no BLE') nor a scenario whereby only Phase 1 of the BLE is delivered.

Focusing on Catford, the primary assumption was that the higher growth scenario appraised would involve a tall buildings cluster. This was explained at paragraph 5.4.11 of the IIA Report:

"The following sites... fall within this area: 17, 18, 19, 21, 22. All bar site 22 fall within the area covered by the emerging Town Centre [Framework], through which preferred indicative densities have been established. The overall approach seeks to strike a balance between suitability for tall buildings in transport terms but constraints to tall buildings in terms of townscape and heritage. The current proposal is to support the densities set out in the Masterplan. However, as per the view taken in 2020, it is considered... reasonable to explore the option of creating a tall buildings cluster at Catford. The specifics would need to be explored further through a detailed study, but there might be potential for an uplift of c.20%."

Expanding on this, a key point to note is that significant stakeholder and community involvement took place during the preparation of the Framework which informed the capacity of the Catford sites in the Local Plan. Within the Framework, each site has been considered in detail, looking at key development principles and parameters including open spaces, public spaces, built form, active frontages, movement, uses, building heights, development impacts and illustrative layouts. This serves to reinforce the appraisal conclusion regarding clear drawbacks to higher growth at Catford under the 'Historic environment, heritage, character and culture' sustainability topic heading, and it is understood that officers do place considerable importance ('weight') on this drawback.

Furthermore, limited capacity to boost densities / supply from Local Plan allocations in Catford is evidenced by recent work undertaken by the Council in May 2024 that looked at increasing the supply of housing to accommodate a 20% buffer (LC10) and also during the examination hearing session discussions on the deliverability of the sites in the housing trajectory. Throughout the process the Catford sites LCA SA 17, 18, 19 and 21 have retained their original site capacities. For one site – LCA SA 22 Ravensbourne Retail Park – the latest proposal is to uplift the site capacity, following the 20% buffer work (LC10) and the hearing session discussions on site deliverability, but the additional 94 residential units now proposed on this site will only generate a 3% uplift, and there is little if any reason to suggest that a further uplift represents a policy choice warranting ongoing consideration.

Further points to note are as follows:

- The current site capacities align with the pre-application discussions that have taken place in respect of: Thomas Lane Yard, which forms part of site allocation LCA SA 17; and LCA SA 18 Catford Island.
- At site 21 the IIA Report discussed flood risk as a constraint, which fed into the order of preference assigned to the growth scenarios under the ‘climate change adaptation’ topic heading. Whilst there is no certainty, it could be that this constraint acts as a significant barrier to delivering a significant boost to site capacity.

All of this still holds true even if Phase 1 of the BLE is delivered, because Phase 1 would terminate at Lewisham town centre, and therefore would not have a major bearing on transport connectivity further south at Catford.

In summary, the current view on ‘Section 7’ text within the IIA Report is as follows:

- The following statement from Section 7 of the IIA Report still holds true: *“In the absence of certainty over the Bakerloo Line Extension (BLE) there is a need to progress a spatial strategy in-line with Scenario 1. However, there is also a need for flexibility in respect of the BLE. Specifically, there is a need to ensure that a framework is in place to support higher density development close to any future BLE stations.”*
- In particular, under a BLE Phase 2 scenario the Council would support an Opportunity Area at Bell Green/Lower Sydenham, and the housing trajectory identifies that there could be a maximum uplift of 2,131 new homes here.
- With regards to Catford, there is certainly not support for significant boost to capacity under either a ‘no BLE’ scenario (IIA Scenario 2) or a BLE Phase 1 scenario (IIA Scenario 4), in light of the issues flagged by the appraisal reported in Section 6 of the IIA Report and also given subsequent work to explore site capacities. Even under a BLE Phase 2 scenario (which would see a new BLE station at Catford), it is not clear that there would be a case for a significant boost to site capacities at Catford, given recent work / latest understanding.

Figure A: The summary appraisal matrix from Section 6 of the IIA Report

BLE scenario		No BLE		BLE Phase 1		BLE Phase 2	
		Scenario 1: -	Scenario 2: Catford	Scenario 3: N' Cross Lewisham	Scenario 4: N' Cross Lewisham Catford	Scenario 5: N' Cross Lewisham A21 Catford LSBG	Scenario 6: N' Cross Lewisham A21 Catford LSBG+
Topic							
Air quality and other pollution		3	4	3	4	2	★1
Biodiversity and green infrastructure		★1	3	2	4	5	6
Climate change adaptation		★1	2	3	4	5	6
Climate change mitigation		5	4	4	3	2	★1
Communities	Accessibility	3	3	3	3	2	★1
	Housing	5	4	4	3	2	★
	Other issues	=	=	=	=	=	=
Economy		5	4	4	3	2	★1
Historic env, heritage, character and culture		★1	3	2	4	5	6
Land and natural resources		=	=	=	=	=	=
Transport		3	4	3	4	2	★1