



Lewisham Local Plan

Examination Hearing Sessions

Response to Actions

Matter 15: Housing Land Supply

Prepared to inform the Local Plan Examination

October 2024

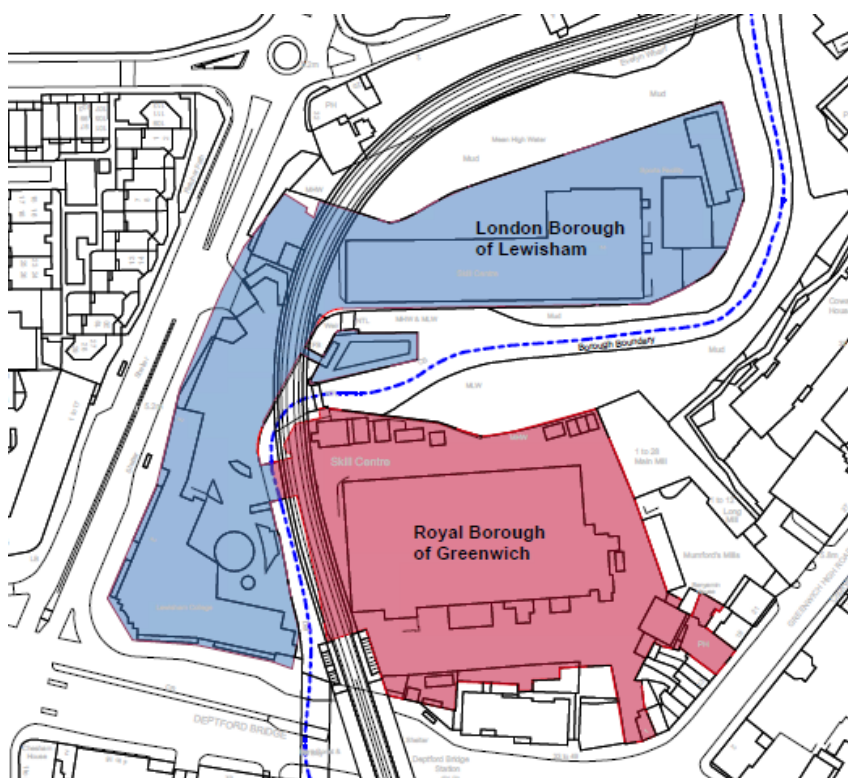
1 Introduction

- 1.1 This Paper is one of a series that provides the London Borough of Lewisham’s (the Council’s) response to specific actions raised, identified, and agreed during the course of the Lewisham Local Plan Examination Hearing Sessions. The actions are agreed with the Inspectors.
- 1.2 The Paper seeks to respond to a specific request for further information made during the Examination Hearing Session that discussed questions raised under Matter 15 Housing Land Supply. In this case the Actions were raised on Wednesday 17 July 2024.

2 Large Windfall Site

Action 204 - At an appropriate moment, the Council will provide the Inspectors with information on the eleventh-hour site that was referenced as potentially being deliverable, for 450 units, during the plan-period.

- 2.1 Towards the end of the Hearing sessions, the Council became newly aware of a large scale windfall site. At the time it was not possible to provide details of the site to the Inspectors, due to commercial sensitivities. Since then, the Council has continued pre-application discussions with the landowners. The landowners have also now carried out a public consultation in late July 2024 and details of this can be found here <https://deptfordbridge.co.uk>. As such, the site details can now be provided to the Examination.
- 2.2 The site is the former Lewisham College site at Deptford Bridge, located in the north of the Borough at 1 Deptford Church Road. It comprises three plots of land – (Plot 1) McWilliams (Plot 2) Gibbs Island and (Plot 3) Ken Langley that are positioned around Deptford Creek and span the boroughs of Lewisham and Greenwich.



- 2.3 Deptford Bridge’s website states that the site currently provides some of Lewisham College’s accommodation. Lewisham College’s main campus at Lewisham Way is undergoing improvement works that will allow unused parts of that campus to accommodate the students and courses provided at Deptford. This will allow Lewisham College to bring all of their college students into their main campus at Lewisham Way, providing the very best experience for all of their students. The vacant Deptford site then provides a great opportunity for redevelopment, to provide:
- much needed new homes for the local area,
 - a new creekside destination next to the Docklands Light Railway,
 - an open and publicly accessible creek,
 - new public spaces and useful and interesting commercial spaces.
- 2.4 Specifically, the proposal will allow for the disposal of the existing Deptford Campus at 1 Deptford Church Street, SE8 4RX, and relocation with improved education provision at Lewisham College Campus, Lewisham Way, SE4 1UT. RER London (the developer) have agreed that, on securing purchase of the site from Newcastle Colleges Group (NCG), that Goldsmiths University of London will continue to occupy the Deptford Campus site now and as part of a future redevelopment. The disposal of the Deptford Campus will allow for an improvement in the quality of education buildings and education service that could be delivered as it would raise significant capital (circa £20m) to fund the improvements and secure the long term future of Lewisham College. There will be no loss of education service provision as a result of the closure of the Deptford Campus, indeed there will be an improvement in the quality of education service that Lewisham College will deliver.
- 2.5 Whilst site capacity and mix of uses has yet to be determined, the Council considers that 450 residential units represents a realistic capacity for this site, given its size and location. The 450 units have been used as a proxy, and has been used in the Final Proposed Housing Spreadsheet October 2024 to contribute towards the housing supply. As with the site allocations in the Local Plan, the capacity of this large windfall site is indicative. The exact quantum of development will be determined on a site-by-site basis through the Development Management process.

3. Land Supply

Action 205 - The Council will provide an updated version of the Table originally set out under its response to Matter 15 MIQ 15.3 – at Paragraph 15.3.3 – which identifies total completions.

3.1 The Council has already provided a response to this Action in LC41.

Action 206 - The Council will submit the latest version of its Authorities Monitoring Report – specifically in reference to delivery rates.

3.2 The AMR 2022/23 has now been prepared and is awaiting final approval for publication. The Council will submit the final version as soon as possible. In the meantime, previous versions of the AMRs can be found here [Lewisham Council - Authority monitoring report](#). In particular, the most recent data relating to housing completions and approvals can be found

here https://lewisham.gov.uk/-/media/amr-2022-23-housing-data-14-12-2023_accessible.pdf.

Action 207 - The Council will provide a separate table that sets out the different sources of supply and how they contribute towards the five-year housing land supply.

3.3 The Council has provided a response to this Action in LC41.

Action 123 - The Council agrees to update the Housing Land Supply trajectory as the remainder of the examination hearing sessions progress – taking account of any changes to the site allocations, with a focus upon their deliverability and timing.

3.4 The Council notes that a number of Actions relate to the capacity and/or phasing of site allocations. They were raised during the Hearing sessions on each of the sub areas. The outcome of these Actions had already been incorporated into the housing trajectory that was discussed during the Hearing session on Matter 15 on Wednesday 17 July 2024.

3.5 For clarity, the Council’s final position and preferred approach in relation to housing requirement and housing supply can be found in the following three documents:

- Revised Written Statement on Matter 15 (WS15/2) October 2024,
- Final Proposed Housing Spreadsheet October 2024,
- Final Proposed Source of Supply October 2024.

3.6 The Council considers that these “capacity/phasing” Actions have been completed, but for clarity, the Council’s responses are outlined below.

Action 129 - The Council and Landsec agree to provide the examination with further details on the phasing of anticipated delivery (on-site) LCA SA 02 Lewisham Shopping Centre – specifically when plots will come forward for construction/ completion. It is understood that Landsec have this information ready.

3.7 Within the Final Proposed Housing Spreadsheet October 2024, the Council has amended Lewisham Shopping Centre to show the latest advanced pre-app phasing. This is comprised of 250 units at phase 1 (consisting of 450 co-living at pro rata 1.8:1 = 250) detailed plot and 119 units at phase 1 detailed plot, totalling 369 units. These have been included within Year 5 (2028/29). The remainder of the site has been phased during Years 7 to 13 (2030/31 – 2036/37) and have been amended to align with Land Securities delivery timeline that they shared during the Hearing session.

Action 138 - The Council to reconsider the suggested uplift for Policy LCA SA22 in the context of the surrounding townscape and adjoining Culverley Green Conservation Area. Specifically, the Council will consider whether the additionality may not be appropriate – with a frontage development of no more than six storeys in height. Ensure that this is clearly set out in the Policy’s Development Guidelines. Consider further inter-related modification that sets out how development will speak to stepped heights across the site- specifically under development guidelines 5 and 6.

3.8 When seeking to boost the housing supply in order to provide a 20% buffer, the Additional Housing Supply Topic Paper (LC10) sought to increase the capacity on this site from 367 units

by 156 units, to create a total of 523 residential units. This aligns with the findings of the Residential Density Technical Paper (EB06), based on an average density of 305 dph within 400m of rail station in the A21 corridor. Upon further consideration, the Council considers that 523 residential units on this site will result in over development that could detrimentally impact on the character of the existing area surrounding the northern and eastern boundaries. Subsequently, the capacity has been dropped to 461 residential units to minimise the impacts associated with redeveloping the site. This is an indicative capacity, and the actual capacity will be determined on a site-by-site basis through the Development Management process.

- 3.9 Furthermore, modifications will be made to the site allocation's Development Guidelines relating to the height of the development, stepping of heights across the development and maintaining an appropriate frontage. The details of this will be set out in appropriate modifications to the new Local Plan that will be the subject of a separate response.

Action 144 - The Council will reconsider where the site allocation LCA SA 07 Lewisham Retail Park sits within the Housing Land Supply Trajectory.

- 3.10 Latest intelligence suggests this site has recently been sold to a new landowner. Whilst the Council understand that they want to engage in a new design and pre-application process, there is no guarantee that delivery will be within the first 5 years. Consequently, the delivery in the housing trajectory has been pushed back until Years 7 and 8 (2030/31 – 3031/32).

Action 156 - The Council consider an amendment to Modification MO115 to reflect the planning status of the site allocation LNA SA 18 Sun Wharf.

- 3.11 It is noted that proposed Modification MO115 originally sought to amend the planning status by acknowledging that the site has a resolution to approve. The site now has a signed S106 agreement and planning permission has been consented. The Council is responding to this Action by preparing appropriate modifications to the new Local Plan that will be the subject of a separate response.

Action 164 - The Council will provide details of completions on this site LNA SA 16 Land north of Reginald Road and south of Frankham Street (former Tidemill School) to date – this to be provided to feed into discussions under Matter 15.

- 3.12 The phasing has been changed to show that part of the site (approximately 83 units) has been completed and will be counted in next year's completions survey for 2024/25. The remainder of the site will be delivered in Year 2 (2025/26). The site contains 209 units in total, although when the 16 existing units that were on the site are considered, this accounts for a net figure of 193 units.

Action 170 - The Council will consider an amendment to the Policy to reflect the extent of non-residential uses permitted under the Barrett and Apex scheme for site allocation LSA SA 01 Former Bell Green Has Holders and Livesey Memorial Hall.

- 3.13 The Council is responding to this Action by preparing appropriate modifications to the new Local Plan that will be the subject of a separate response.

Action 174 - The Council will consider the phasing of the site allocation LSA SA 04 Stanton Square LSIS – specifically, how the landownership components could come forward over the plan period. The Council will modify accordingly.

3.14 For clarity, the phasing of this site has been amended so that the 94 units have been split into 2 parts to reflect the multiple ownership plots on the site, with 50 units anticipated to be delivered in Year 12 and 44 in Year 13 (2035/36 – 3036/37).

Action 179 - Provide the examination with an overall capacity for the site allocation LWA SA 09 Willow Way.

3.15 The capacity of this site has been amended to show a total of 210 units across the whole site. Of these, 60 units on Plot A were granted on Appeal at 21-57 Willow Way and are phased in Year 4 (2027/28). The remaining 115 units can be delivered on plots B and C and are phased in Year 5 (2028/29).

3.16 A calculation has been used to generate an additional 35 units on Plots D and E, that had previously been missed, based on a density of 260 dph, with delivery anticipated in Year 10 (2033/34) and Year 16 (2039/40) . The capacity is indicative, and the exact quantum of development will be determined on a site-by-site basis through the Development Management process.

3.17 The Council has already responded to Action 180 – this is set out under LC51. It states the Council has considered Plot E, and its relationship with the other plots within the site allocation. The Council considers that it will be appropriate to seek improvements to the existing employment provision in Plot E and where possible to intensify its existing use. This can be done through the introduction of residential units as part of a co-location scheme.

3.18 The Council maintains that it is appropriate to deal with the whole of the site allocation, including Plot E, in a comprehensive manner. This approach will secure a more optimal use of land and enable the delivery of new and improved workspace to support the long-term viability of the LSIS. Consequently, the Council does not wish to de-allocate Plot E or remove it from the boundary of site allocation LWA SA 09.

Action 186 - The Council will consider an option to phase delivery across both site allocations LWA SA 04 Land at Forest Hill Station East (Waldram Place Perry Vale) and LWA SA 05 Land at Forest Hill Station West (Devonshire and Dartmouth Roads) over a longer period – to reflect the possible impact of multiple landownerships upon implementation.

3.19 The capacities of these two sites have remained the same but the phasing of the site has been extended over a three-year period during Years 13, 14 and 15 (2036/37 – 2038/39) to reflect the possible impact of the multiple ownerships upon the site's delivery.

Action 191 - The Council to consider how it could advance the delivery of this site allocation LWA SA 10 74-78 Sydenham Road – could the site come forward sooner than in year sixteen?

3.20 The Council maintains that it is unlikely that the site can be delivered sooner than Year 16, given the current lack of progress made towards a planning application. For consistency, this

is the approach the Council has taken with other site allocations that have yet to make planning progress, such as Beadles Garage and Downham Co-op.

Action 193 - The Council will modify the plan/ trajectory to split delivery on the site allocation LEA SA 07 Mayfield Hostel over two years – in accordance with the latest intelligence.

3.21 The housing trajectory has been amended from 65 to 64 units, in line with the latest intelligence on the site. The Council has already responded to Action 192 - set out under LC61. It states that the Council confirm that the Mayfields Hostel is not yet vacant but that the decant can be carried out swiftly. The Council is committed to progressing towards demolition and re-build without undue delay. It does not require a phased delivery and therefore the whole 64 units are anticipated to be delivered in Year 3 (2026/27).

Action 200 - The Council will consider a modification to site allocation LEA SA 04 Sainsbury's Lee Green that splits delivery of the site over two phases in order to accommodate a requirement that provides an opportunity for the continuous trading of the food store on-site (in some temporary form).

3.22 The phasing has been amended so that delivery is phased over Years 14 and 15 (2037/38 – 2038/39), ensuring redevelopment minimises the impact on the food store.

Action 224 – Adjust the housing trajectory to move site allocation LWA SA 07 Clyde Vale LSIS into 15 year period.

3.23 The phasing has been amended so that delivery is brought forward into Year 15 (2038/39).

4. Consequential Modifications

4.1 In addition to the above, many other changes have been made to the housing trajectory, since submitting the Local Plan in November 2023; refining the capacity and phasing of sites to align with the most up-to-date intelligence from landowners, developers and Development Management officers and in line with discussions held during the Hearing sessions on the sub areas. The Modifications Schedule will provide details of each of these consequential changes in a separate document.

5. Matter 15 Written Statement

Action 208 - The Council will provide the examination with an update to its Matter 15 MIQ responses; where these remain relevant.

5.1 The Council has prepared a revised Matter 15 written statement. This is appended separately to this document and will supersede WS15/1.