



Lewisham Local Plan

Spatial Strategy Background Paper

Prepared to inform the Local Plan Examination

February 2024

LONDON BOROUGH OF LEWISHAM

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Summary

- The Council considers that the new Lewisham Local Plan identifies an appropriate strategy for securing successful and sustainable place-making across the Borough during the plan-period.
- The new Lewisham Local Plan's Spatial Strategy is entitled "Delivering an Open Lewisham". It serves to provide an overarching policy for the Local Plan that is the starting point for implementing the Vision for Lewisham and responding to the plan's strategic objectives. It provides the key link between the Local Plan and the London Plan. It seeks to ensure that Good Growth is delivered in a way that responds to Lewisham's distinctiveness.
- The new Lewisham Local Plan has been informed, or justified, by a wide range of supporting technical evidence. This proportionate evidence base includes the Lewisham Local Plan Integrated Impact Assessment (PD 04) and the concise Integrated Impact Assessment Non-technical Summary (PD 05).
- The evolution of the Spatial Strategy has considered a suite of reasonable alternatives and then through an evidence-based assessment identified an appropriate strategy. This considered six possible growth scenarios, or reasonable alternatives at the preparation of a local plan stage of the process. These were tested through the Lewisham Local Plan Integrated Impact Assessment (PD 04).
- The Spatial Strategy is the Council preferred growth scenario. In respect of the Integrated Impact Assessment the Strategy equates to Scenario 1. This has remained relatively consistent between considerations at plan preparation (Regulation 18) and publication stage (Regulation 19).
- As the local plan-making process progressed the preferred growth scenario was further supported and guided by outputs from the technical evidence-base. This included evidence that was prepared to support the London Plan and locally specific technical data, such as that produced in relation to building height and visual character and appearance.
- The Integrated Impact Assessment illustrates Scenario 1 and identifies how future growth could be distributed at Regeneration and Growth Nodes, Major District and Local Centres, Opportunity Areas, and site allocations. This forms the basis of the Spatial Strategy illustrated under new Local Plan Figure 3.3.
- The Bakerloo Line Extension is a strategic transport improvement that continues to be strongly promoted by the Council in partnership with the Greater London Authority, Transport for London, and Southwark Council. It will secure access to sustainable transport networks in southeast London and will not only provide infrastructure to service but will also stimulate strategic growth in homes and jobs. It will make an important strategic contribution towards place-making.
- Although there are uncertainties associated with the timing of the Bakerloo Line Extension's delivery, the assessment of the reasonable alternatives, and the subsequent Spatial Strategy have sought to provide flexibility to ensure that a framework is in place to support higher density development as this key strategic infrastructure improvements commences implementation – through the new plan-period and into the next.

- The six reasonable alternatives all consider the potential for Bakerloo Line Extension being implemented, either in part or full, during the plan-period. The Integrated Impact Assessment tested Scenario 1 on the basis that whilst it does not envisage the delivery the Bakerloo Line Extension during the plan-period, it nevertheless provides a framework for securing higher intensity growth at Stations, and the surrounds, along its alignment.
- The new Local Plan provides flexibility to consider higher intensity proposals that could be facilitated at appropriate locations, such as those at relevant Stations and their surrounds, should the Bakerloo Line Extension come forward earlier than anticipated. This was tested through the Integrated Impact Assessment and can be accommodated through the new Local Plan site allocations and planning policies.
- The Council continues to work closely and positively with the Greater London Authority to ensure that the new Local Plan, its Spatial Strategy, site allocations and planning policies align and are in accordance with the London Plan. The Greater London Authority's comments to the Publication version (Regulation 19) of the new Local Plan demonstrate that they are supportive of the Spatial Strategy. Work on Statement of Common Ground between the two partners is at an advanced stage and it is anticipated that this will resolve many of the matters raised through the plan-making process: inclusive of any concerns of general conformity.

1. Introduction

- 1.1 Lewisham Council (the Council) has prepared the following background paper on the new Lewisham Local Plan Spatial Strategy in order to provide a supplementary narrative on this matter and in response to questions raised by the appointed Inspectors. The background paper is submitted to the examination for consideration and reference.
- 1.2 Specifically, the background paper clarifies the assessment of the Spatial Strategy, and the other associated reasonable growth scenarios, that were progressively undertaken through the plan-making process Integrated Impact Assessments. It seeks to respond to the specific request for clarity as to how the plan-making process, through Integrated Impact Assessments, considered options, discounted alternatives, and identified an appropriate spatial strategy.
- 1.3 The background paper also explores the relationship between the new Local Plan, its Spatial Strategy, and the delivery of the Bakerloo Line Extension transport improvement in the medium to long-term. It provides an overview as to how this regionally important transport scheme has been technically assessed and incorporated into the new Local Plan.
- 1.4 The background paper will be submitted to the examination in alignment with the Council's responses to the Inspectors' Initial Questions and will help inform the process as it moves towards the subsequent Matters, Issues and Questions.

2. The New Lewisham Local Plan Spatial Strategy

- 2.1 The new Lewisham Local Plan (PD01) sets out a spatial strategy for the Borough under its Chapter 3 Vision, Strategic Objectives, and the Spatial Strategy. It serves to provide an overarching policy for the Local Plan that is the starting point for implementing the Vision for Lewisham and responding to the plan's strategic objectives. It sets out the spatial strategy for the Borough that is the land use and planning framework for the Council and its partners to manage growth and development, as well as to guide new investment up to 2040. The spatial strategy also serves to provide the key link between the Local Plan and the London Plan. It seeks to ensure that Good Growth is delivered in a way that responds to Lewisham's distinctiveness.
- 2.2 It is preceded by the Council's Vision for Lewisham, which seeks to address the key challenges facing the Borough across the plan-period. The Vision is articulated through the Council's Strategic Objectives which are set out sequentially under Table 3.2: Lewisham Local Plan – Strategic objectives. These have been informed by and reflect many of the key documents prepared by the Council, including the Corporate Strategy 2018-2022, along with those published by partners and other key stakeholders. The Vision and Strategic Objectives represent the main delivery outcomes sought through the implementation of the Local Plan.
- 2.3 The new Lewisham Local Plan Policy OL 01 Delivering an Open Lewisham (spatial strategy) sets out how the Council will work with its partners to deliver the Vision for the Borough. This is articulated through Figure 3.1: Character-led growth (Lewisham Characterisation Study, 2020), and Figure 3.2: Proposed Growth Strategy plan, which precede the policy and its supporting text. These Figures illustrate how the process has

been informed by technical evidence, in the form of the Characterisation Study (EB07) and translated into a spatial strategy that directs growth and investment towards places that can accommodate and deliver. The subsequent Figure 3.3: Borough-wide Spatial Strategy plan illustrates how the translation has been completed in terms of place and investment (in specific improvements). The new Local Plan continues this process through its policies and site allocations – with the objective of securing successful and sustainable place-making.

3. The Evolution of the Spatial Strategy

- 3.1 The following section of the background paper seeks to set out how the Council prepared the new Lewisham Local Plan Spatial Strategy. Specifically, it will provide an overview of how the strategy evolved through the stages of plan preparation; the reasons for selecting the preferred spatial option and why other reasonable alternatives were discounted.
- 3.2 The new Lewisham Local Plan is being assessed against the National Planning Policy Framework (September 2023). That document identifies¹, four “tests” under which new local plans can be found sound. National planning policy states that plans are sound if they are justified; namely, that they have an appropriate strategy, which considers reasonable alternatives, and is based on a proportionate evidence base.
- 3.3 The new Lewisham Local Plan has been informed, or justified, by a wide range of supporting technical evidence. The key documents have been submitted to the examination and are identified under the Regulation 22 Submission Documents List. Within the context of the Spatial Strategy, this proportionate evidence base includes the Lewisham Local Plan Integrated Impact Assessment (PD 04) and the Characterisation Study (EB07).
- 3.4 The evolution of the new Lewisham Local Plan’s Spatial Strategy has followed the approach of considering reasonable alternatives and then through an evidence-based assessment identifying an appropriate strategy. Consequently, the Council considers it sound. The local plan-making process considered six possible growth scenarios, or reasonable alternatives at the preparation of a local plan stage of the process². It is highlighted that the plan-making process does not need to demonstrate that it has exhaustively considered all possible growth scenarios – rather, it should, as has been undertaken, demonstrate that it has considered reasonable alternatives. It is noted that no objections have been made in respect of this approach – no party has suggested that the plan-making process explore and assess another alternative growth scenario.
- 3.5 Consequently, the reasonable alternatives were tested through the Lewisham Local Plan Integrated Impact Assessment (PD 04). How the Assessment defined the extent of the reasonable alternatives is set out under PD 04 Paragraphs 4.2.4 and 4.2.5.
- 3.6 The Integrated Impact Assessment (PD 04) continues under its Section 5 Defining growth scenarios. This seeks to firstly cover a) ‘top down’ analysis of strategic issues and options with a bearing on the selection of reasonable growth scenarios; and b) ‘bottom up’ analysis of the pool of sites that might feature as allocations within the reasonable

¹ Under NPPF Examining Plans Paragraph 35

² Under The Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 18.

growth scenarios. Subsequently, the Assessment provides an analysis of individual sub-areas within the Borough, drawing upon the preceding strategic and site-specific analysis, with the aim of reaching a conclusion, for each sub-area, on whether a single growth scenario emerges that is firmly evidenced, or there is a need to examine alternatives. Under Sub-Section 5.5 of the Assessment, the six reasonable alternatives were tested. These are summarised under Box 5.2 and Tables 5.6 – 5.8.

- 3.7 The final section then draws matters together to define Borough-wide reasonable growth scenarios for assessment (under Section 6 - Growth Scenarios Assessment) and consultation. The Integrated Impact Assessment Non-technical Summary (PD 05) summarises the entire process. The Council highlights the following to illustrate the iterative process:
- i) Table C provides a summary of the six reasonable alternatives,
 - ii) Tables D and E set out the potential uplift offered by the reasonable alternatives in percentage and number terms respectively,
 - iii) Table F provides a summary of the assessment of the reasonable alternatives and demonstrates how preferred growth scenario evolved to become the Spatial Strategy.
- 3.8 The preferred growth scenario (PD 05 Page 17) summarises the conclusion of this process.
- 3.9 The Spatial Strategy is the Council's preferred growth scenario. In respect of the Integrated Impact Assessment the Strategy equates to Scenario 1.
- 3.10 The Council highlights that its preferred growth scenario has not fundamentally changed between considerations at plan preparation (Regulation 18) and publication³ stage. This is because of the support provided to the preferred growth scenario from the point (onwards) of those initial preparatory stages of the process. Consequently, the new Local Plan's Spatial Strategy has been consistent throughout the process.
- 3.11 As the local plan-making process progressed the preferred growth scenario was further supported and guided by outputs from the technical evidence-base. Most notably, it was supported by the outcomes of the London-wide Strategic Housing Land Availability Assessment⁴; and the London Plan Spatial Strategy (among other sources), which focusses upon directing growth towards town centres and opportunity areas across the Capital. These provide a clear path for the Spatial Strategy to evolve. In conclusion, the Council considers that the preferred growth scenario was an appropriate, and the most likely, strategy to be taken forward, and was recognisable as such from an early point in the plan-making process – namely, as an outcome from the consultation and engagement undertaken at Regulation 18 stage.
- 3.12 The Council highlights that three elements of the process and evidence-base have fundamentally influenced the content and form of the spatial strategy. These are:

³ Under The Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 19.

⁴ This strategic technical evidence document was being prepared to support London plan-making but has also informed local plan-making across the Capital. As technical evidence it was assessed through the London Plan examination. It can be found here: [Strategic Housing Land Availability Assessment | London City Hall](#)

- i) The outcomes from the Characterisation Study (EB07), which are summarised under the new Local Plan Figure 3.1: Character-led growth. In simple terms this identifies those places across the Borough that have the capacity to accommodate change and growth over the plan-period. This is further expanded through the work undertaken by the Tall Buildings Review (EB 01) and Tall Buildings Study (EB 05).
- ii) The Council’s assessment of site allocation identification, which is set out under the Site Allocation Background Paper (EB 19).
- iii) The internal engagement with the Council’s elected Members that has taken place throughout the local plan-making process. This has informed the drafting of the different versions of the plan at the preparation and publication stages. The outcomes and decisions of this are encapsulated within the relevant related reports to Mayor and Cabinet, which considered the evolving iterations of the new Local Plan.

3.13 Moving forward, the Inspectors have asked the Council to clarify whether the new Local Plan’s housing, employment and town centre site allocations reflect those assessed through the Integrated Impact Assessment process under Scenario 1. They have specifically sought clarification in respect of the parameters discussed within the Integrated Impact Assessment process. Namely, the percentage and housing uplift over and above the baseline both at a Plan level and an area-based level. This provides a clarification of how the local plan-making process considered the reasonable alternatives, identified Scenario 1 as an appropriate strategy, and subsequently how the new Local Plan, its site allocations and planning policies evolved from that genus.

3.14 The Integrated Impact Assessment Section 7 Developing the Preferred Approach speaks to how Scenario 1 evolved to become the preferred strategy. This is set out under Paragraph 7.2.1, which states that consideration was given to the higher levels of growth that could theoretically be achieved through the other reasonable alternatives. However, given the uncertainty of the Bakerloo Line Extension delivery timetable there is a need to progress a spatial strategy in-line with Scenario 1. Nevertheless, it was accepted that there remains a need for flexibility in respect of the Bakerloo Line Extension going forward – either towards the end of the new plan-period, or into the life of the subsequent Plan. Specifically, it was considered that there is a need to ensure that a framework is in place to support higher density development close to any future Bakerloo Line Extension stations.

3.15 The Integrated Impact Assessment illustrates Scenario 1 across a Borough map base under Part 1 Page 45⁵. This identifies how future growth could be distributed at Regeneration and Growth Nodes, Major District and Local Centres, Opportunity Areas, and site allocations. It also identifies the Borough’s strategic and industrial employment sites.

3.16 The Integrated Impact Assessment Box 8.1 Summary of the proposed spatial strategy and Figure 8.1 provides an overview of how Scenario 1 has translated into the Spatial Strategy. The Council highlights the following extract from Box 8.1 –

“The total capacity of the proposed allocations is circa 24,400 homes, and it is expected that all of these sites will be delivered within the plan period. Additional supply over the

⁵ This part of the Integrated Impact Assessment also illustrates the other reasonable alternatives on map bases.

plan period (2020/21 to 2039/40) then comes from: large, consented sites that do not require an allocation (~1,500 homes); and small sites (including delivered/consented and a windfall assumption) (~7,370 homes). In total, therefore, the total proposed supply over the 20-year plan period is ~33,300 homes, or 1,665 dpa. This broadly aligns with the London Plan target figure of 1,667 dpa; however, there are two further considerations. Firstly, there is a need to consider the trajectory of housing delivery across the plan period, namely the fact that it is naturally weighted more towards earlier years. Secondly, there is a need to consider the need for a supply buffer over-and-above any housing target/requirement that is committed to for the purposes of monitoring (and five-year housing land supply and Housing Delivery Test calculations), as it is inevitably the case that not all of the large sites in the supply will deliver as anticipated. These matters are explored further under the ‘Housing’ heading, in Section 9.”

3.17 The Integrated Impact Assessment Non-technical Summary (PD 05) summarises how the reasonable alternatives were assessed, in relation to potential housing supply and broad distribution under its Tables C – E.

3.18 Moving forward the local plan-making process identifies proposed growth strategy under the new Local Plan Figure 3.2 The Proposed Growth Strategy plan, which itself is further translated into the Borough-wide Spatial Strategy plan under Figure 3.3. The new Local Plan extrapolates these further, in place-making terms, in its approach towards Lewisham’s Neighbourhoods and Places (Lewisham Local Plan Part 3, Chapters 13 – 18), and the associated site allocations.

3.19 The Integrated Impact Assessment considers housing supply and delivery under Section 9.7 and under Paragraph 9.7.1 states that –

“The total capacity of the proposed allocations is circa 24,400 homes, and it is expected that all of these sites will be delivered within the plan period. Additional supply over the plan period (2020/21 to 2039/40) then comes from: large, consented sites that do not require an allocation (~1,500 homes), some of which have delivered or are started to deliver; and small sites (~7,370 homes; comprising those that have delivered, those that are consented and a windfall assumption for the latter years of the plan period). In total, therefore, the total proposed supply over the 20-year plan period is ~33,300 homes, or 1,665 dpa.”

3.20 The Council notes that whilst housing supply is an important matter, and one that current national policy expends much effort addressing, it is not the only component of successful sustainable place-making. Within that necessary wider context, the Integrated Impact Assessment considers wider issues under its Section 9.8 and Paragraph 9.8.1. It specifically seeks to assess the spatial strategy’s performance in meeting the objectives of supporting strong communities, providing equality of opportunity and good health; and addressing existing areas of deprivation, exclusion, poor health, and crime.

3.21 The Council reiterates that Scenario 1, the preferred growth scenario, is consistent with the Spatial Strategy. The above narrative provides an overview of how evolution and assessment through plan-making process has been consistent and has translated into the Spatial Strategy, its site allocations and planning policies. This is fully demonstrated throughout the Integrated Impact Assessment (PD 04) Sections 5, 6 and 7, and

subsequent Sections 8 and 9. The assessment of the Spatial Strategy is summarised within Integrated Impact Assessment Non-technical Summary (PD 05) under its Part 1.

- 3.22 Furthermore, it is highlighted that the Spatial Strategy, in terms of how it guides place-making through the location and intensity of new Local Plan's site allocations, and through the general planning policies, is consistent with the outcomes from the technical evidence contained within the Characterisation Study (EB 07) and the Tall Building evidence (EB01, EB02 and EB05).

4. The Bakerloo Line Extension

Background

- 4.1 The Bakerloo Line Extension is a strategic transport improvement that continues to be strongly promoted by the Council in partnership with the Greater London Authority, Transport for London, and Southwark Council. As an extension to the Capital's Tube network, the improvements will be implemented by Transport for London. Detail of the proposed improvement can be found on the Transport for London website here – <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/bakerloo-line-extension>.
- 4.2 A new Report, commissioned by Central London Forward⁶ and prepared by Hatch, will be launched at Parliament on 5 March 2024. The Report will demonstrate that the Bakerloo Line Extension will have a transformative impact across London and tangible benefits for the Nation as a whole. The Council will supply the Examination with a copy of the Report following its launch and formal publication.
- 4.3 The Bakerloo Line Extension will secure access to sustainable transport networks in southeast London and will not only provide infrastructure to service but will also stimulate strategic growth in homes and jobs. It will make an important strategic contribution towards place-making. It will provide residents, communities, businesses, and visitors with sustainable travel choices; and will have consequential benefits for improving health and wellbeing; economic growth and air quality (among other benefits). By introducing and providing access to London's Tube network the improvements will potentially bring the possible opportunities for intensification, regeneration, and comprehensive change to new parts of the Capital. Such investment could serve to significantly boost the supply and delivery of new growth in a more meaningful and lasting way than those recent soundbites commenting on the Capital's housing delivery performance.
- 4.4 It is highlighted that the benefits that will be brought by the Bakerloo Line Extension will extend across the whole of the Capital and will not be exclusive to Southwark, Lewisham, and potential Bromley. It is a genuinely strategic improvement and investment. Consequently, the London Plan addresses the Bakerloo Line Extension as part of the Capital's Spatial Development Pattern⁷, and as a strategic transport

⁶ A partnership comprised of twelve central London local authorities that includes Lewisham and Southwark Councils.

⁷ As part of the London Plan Chapter 2 Spatial Development Patterns – see Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs; and Bakerloo Line Extension Paragraph 2.1.14 onwards.

improvement forming part of their consideration of transport capacity, connectivity and safeguarding⁸.

- 4.5 Whilst the Council acknowledges that the certainty of securing funding for the delivery of the Bakerloo Line Extension has, over time, fluctuated, the proposal remains sound. As stated above, the strategic benefits that it will bring to successful and sustainable place-making, not least in terms of the potential to genuinely improve housing delivery, are considerable. In comparison to other schemes and investment opportunities, the Bakerloo Line Extension is advanced in terms of preparatory work and will provide good value.
- 4.6 Work on promoting and supporting the delivery of the Bakerloo Line Extension is currently dynamic. The potential for securing funding for infrastructure improvements that facilitate improved housing delivery performance across the Capital could gain further traction over the next year – particularly if there is a change in national policy. The Council, and its partners will seek to inform the examination of developments when such information becomes publicly available. It is reasonable to assume that the Council and its partners may be in a position to provide the examination with further information in advance of the scheduled hearing sessions.
- 4.7 The Bakerloo Line Extension and the new Lewisham Local Plan
It is acknowledged that the precise timing for the delivery of the Bakerloo Line Extension is uncertain. This is not unusual for a scheme of this scale or nature. Nevertheless, it remains sound plan-making for the new Lewisham Local Plan to consider and address the prospect of the Bakerloo Line Extension as part of a wider strategy – for example, as a strategic infrastructure improvement considered in the context of National Planning Policy Framework Paragraph 22. This is the approach that the Council has taken.
- 4.8 The Lewisham local plan-making process has sought to consider and address the Bakerloo Line Extension through the application of its Integrated Impact Assessment. This made a number of assumptions, based on Bakerloo Line Local Economic Impact Assessment (2020), as to what the delivery of the scheme could bring to the reasonable alternative growth scenarios being prepared and assessed through the plan-making process (leading to the identification of an appropriate strategy). These are set out under the Integrated Impact Assessment (PD 04) Paragraphs 5.2.23 and 5.2.24. These informed the identification of reasonable alternatives.
- 4.9 The evolution of the new Lewisham Local Plan’s Spatial Strategy considered six reasonable alternative growth scenarios. These are set out under the Integrated Impact Assessment (PD 04) under Section 5.5 Establishing the reasonable growth scenarios and are summarised under Table 5.6 The reasonable growth scenarios (summary); Table 5.7 The reasonable growth scenarios (in terms of percentage uplifts on the baseline scenario); and Table 5.8 The reasonable growth scenarios (in terms of total number of homes). The reasonable alternatives tested through the Integrated Impact Assessment process are –

⁸ See London Plan Policy T3 Transport capacity, connectivity and safeguarding, which references the Bakerloo Line Extension in addition to the delivery of upgrades to Underground lines, Crossrail 2, river crossings and an eastwards extension of the Elizabeth line.

- i) Scenario 1 – assumes that the Bakerloo Line Extension is unlikely to be delivered⁹ during the plan-period and that as a consequence growth will be delivered at the projected baseline position.
- ii) Scenario 2 – also assumes that the Bakerloo Line Extension is unlikely to be delivered during the plan-period but that a 20% uplift in delivery will be achieved in Catford Town Centre through the application of higher development densities.
- iii) Scenario 3 – considers that Phase 1 of the Bakerloo Line Extension will be delivered during the plan-period and that as a consequence New Cross and Lewisham each achieve an uplift of an additional 10% through increased development.
- iv) Scenario 4 - considers that Phase 1 of the Bakerloo Line Extension will be delivered during the plan-period and that as a consequence New Cross and Lewisham each achieve an uplift of an additional 10% through increased development, and that a 20% uplift in delivery will be achieved in Catford Town Centre through the application of higher development densities.
- v) Scenario 5 – considers that both Phase 1 and Phase 2 of the Bakerloo Line Extension will be delivered during the plan-period and that as a consequence uplifts in delivery will be experienced along its entire length, including a 100% uplift in growth at Bell Green / Lower Sydenham.
- vi) Scenario 6 - considers that both Phase 1 and Phase 2 of the Bakerloo Line Extension will be delivered during the plan-period and that as a consequence uplifts in delivery will be experienced along its entire length, including a higher 200% uplift in growth at Bell Green / Lower Sydenham.

4.10 For clarification, the six reasonable alternatives all consider the potential for Bakerloo Line Extension being implemented, either in part¹⁰ or full, during the plan-period. The suggestion that Scenario 1, which forms the basis for the Spatial Strategy, does not include the Bakerloo Line Extension is mistaken.

4.11 The Council considers that the Bakerloo Line Extension is a strategic transport improvement that has to be considered and prepared for within the context of National Planning Policy Framework Paragraph 22. Namely, that – “*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*”. The new Local Plan considers the Bakerloo Line Extension within such a context¹¹, and this is reflected within its spatial strategy, site allocations and planning policies, which allow for the opportunities and benefits facilitated by its delivery beyond the Plan period.

4.12 The Integrated Impact Assessment process tested Scenario 1 (the preferred growth scenario) on the basis that whilst it does not envisage the delivery the Bakerloo Line Extension during the plan-period, it nevertheless provides a framework for securing

⁹ For clarity, the Integrated Impact Assessment assumed delivery to be completion of either Phase 1 and Phase 2 of the Bakerloo Line Extension during the life of the new Local Plan.

¹⁰ In the case of Scenarios 1 and 2.

¹¹ It is noted that whilst NPPF Paragraph 22 refers to new settlements or significant extensions, it does not exclude other forms of strategic scale development – inclusive of infrastructure, such Bakerloo Line Extension, that could legitimately facilitate transformative growth by making places more accessible and therefore more appropriate locations for higher density development.

higher intensity growth at Stations, and the surrounds, along its alignment. This summarised under the Integrated Impact Assessment Non-technical Summary (PD 05) Preferred Growth Scenario¹².

- 4.13 The Council suggests that the implementation of the Bakerloo Line Extension may realistically commence during the plan-period and that prospect is recognised within Scenario 1 and therefore the Spatial Strategy. The Council suggest that the full impact of growth that will come as the phased delivery of the Bakerloo Line Extension continues over time will be beyond the plan-period. However, it is suggested that the six sites allocated at Bell Green will pave the way for future place-making once the improvement has been delivered. This is acknowledged through the housing land supply trajectory, which also recognises that should the Bakerloo Line Extension come forward earlier then development densities could increase.
- 4.14 In addition, the new Local Plan's planning policies provide further flexibility to consider higher intensity proposals that could be facilitated at appropriate locations, such as those at relevant Stations and their surrounds, should the Bakerloo Line Extension come forward earlier than anticipated. This is the case in relation to the new Local Plan's approach towards optimising building height (Policy QD 04); site capacity (Policies QD 06 and EC 13); master plans and comprehensive development (Policy DM 03); and the application of indicative capacities through the site allocations. These provide for a flexible, dynamic, and evidence-based approach towards growth that could allow for higher intensity development along a completed Bakerloo Line Extension alignment, where capacity allows.
- 4.15 It is within this context that the Inspectors requested that the background paper provide clarification on the possible additional uplift at Bell Green. The new Lewisham Local Plan Update to Appendix 6 (PD 18) identifies a Housing Trajectory and Five-Year Housing Land Supply for the period between 2023/24 – 2037/ 38. This is in accordance with the National Planning Policy Framework Paragraph 68¹³. In accordance with the possible position set out above, the updated Appendix 6 includes an additional table (at its end) that sets out the potential uplift that could be achieved from the Bell Green sites. For clarity, these sites are allocated in the new Local Plan under the following site allocation policies –
- i) Former Bell Green Gas Holders and Livesey Memorial Hall – Policy LSA SA 01
 - ii) Bell Green Retail Park - Policy LSA SA 02
 - iii) Sainsbury's Bell Green – Policy LSA SA 03
 - iv) Stanton Square LSIS – Policy LSA SA 04
 - v) Sydenham Green Group Practice – Policy LSA SA 05
 - vi) Worsley Bridge Road LSIS – Policy LSA SA 06
- 4.16 For clarity, the new Local Plan Update to Appendix 6 (PD 18) considers that increased intensity uplift, at most of these locations, could occur towards the end of the plan-period; in accordance with work on the Bakerloo Line Extension commencing. As stated, the new Local Plan considers this possibility and signals that subject to the sustainable transport improvements being within sight, higher development densities could be positively considered. For further clarity, the identified uplifts are in addition to what is anticipated with greater certainty at this point in time. It is highlighted that these site

¹² Integrated Impact Assessment Non-technical Summary (PD 05) Page 17.

¹³ This is NPPF September 2023, which is the version that the new Lewisham Local Plan will be assessed under.

allocations (Policies LSA SA 01 – SA 06) have a range of indicative capacities identified, rather than a fixed baseline position for this very reason.

- 4.17 The Integrated Impact Assessment Non-technical Summary (PD 05) provides an overview of The preferred growth scenario. This states – *“The Growth Scenarios have explored a number of potential responses to the Bakerloo Line Extension and, whilst there would need to be further work undertaken to explore all opportunities in proximity to a new Bakerloo Line Extension Station, at this time the option for more ambitious growth at Bell Green/ Lower Sydenham stands out as well performing”*.
- 4.18 Furthermore, the Lewisham Site Allocations Background Paper (EB 15) considered the potential uplift in housing delivery that could be facilitated by the early delivery of the Bakerloo Line Extension. This is set out under its Paragraphs 7.3.9 – 7.3.11. This explored how an uplift could be accommodated within the new Local Plan’s Spatial Strategy, site allocations and planning policies. Specifically, it considered how intensification could be accommodated early in the plan-period, in respect of improving PTAL (from PTAL 2 to 3 and PTAL 4 to 6) and the realisation of Bell Green as an Opportunity Area (see EB 15 Table 2).

5. General Conformity with the London Plan

- 5.1 The London Plan provides the strategic planning context for the Capital. It sets out an approach for London’s future that seeks to secure what it defines as good growth¹⁴ – namely, growth that is socially and economically inclusive and environmentally sustainable. This underpins the whole of the London Plan. It continues by setting out a spatial strategy for the Capital¹⁵, which has been fundamental in guiding the evolution of the new Local Plan’s Spatial Strategy.
- 5.2 The London Plan also sets out the approaches for the scale and nature of growth, and its supporting strategic infrastructure being distributed across the Capital to the constituent London boroughs, who hold the responsibility for local plan-making. The preparation of new Lewisham Local Plan has sought to ensure that the evolution of its spatial strategy, site allocations and planning policies is consistent and alignment with the London Plan. Critically, the plan-making process (through the Integrated Impact Assessment) discounted reasonable alternative growth scenarios that would have resulted in delivery exceeding that planned for through the London Plan. This is set out as part of the consideration for the Council’s preferred growth option/ Scenario 1, which evolved into the new Local Plan Spatial Strategy¹⁶.
- 5.3 Throughout the plan-making process the Council and the Greater London Authority have maintained an ongoing dialogue on the strategic matters that are relevant to Lewisham. The Council has a continuing positive relationship and regularly discuss strategic matters affecting Lewisham and the wider Greater London area. This is demonstrated through the Duty to Cooperate Statement (PD 08). That on-going engagement has sought to ensure that the new Local Plan is aligned, consistent and in general conformity with the London Plan.

¹⁴ London Plan Chapter 1 Planning London’s Future - Good Growth

¹⁵ London Plan Chapter 2 Spatial Development Patterns

¹⁶ Integrated Impact Assessment Non-technical Summary (PD 05) - The preferred growth scenario (Page 17)

- 5.4 As a key requirement of the plan-making process¹⁷, for London Boroughs, the Council made a request under section 24(4)(a) of the Act to the Mayor of London for an opinion on the general conformity of the new Lewisham Local Plan with the London Plan. This requested was submitted in accordance with the Regulations on the date of publication¹⁸, on 1 March 2023. The Mayor’s response to the Council was sent on 24 April 2023 as a component of the comments made on his behalf by the Greater London Authority.
- 5.5 The Mayor of London has offered guidance and broad support for the new Local Plan through his representations made at Regulation 19 stage. The Council acknowledges the positive engagement undertaken with the Mayor and his Officers during the previous Regulation 18 stage which informed the content of the submitted new Lewisham Local Plan.
- 5.6 Nevertheless, the Council acknowledges that the Mayor has expressed an opinion that the new Lewisham Local Plan may not be in general conformity with the London Plan for two very specific reasons relating to the management of industrial employment land. This opinion has been subject to considerable discussion between the Council and the Greater London Authority, with an objective of understanding the true nature of the Mayor’s concerns and the specific actions required to secure an opinion that the new Lewisham Local Plan conforms with the London Plan.
- 5.7 To this objective, the Council and the Greater London Authority are in the process of preparing a Statement of Common Ground that will provide an overview of the discussions and actions undertaken since the publication of the Mayor’s original opinion and the subsequent agreement arrived at between the two partners. The Statement will address the other key strategic matters that the two partners are engaged in through their shared plan-making and decision-taking responsibilities.
- 5.8 It is anticipated that the Statement of Common Ground between the two partners will record their agreement that the new Lewisham Local Plan sets out an appropriate Spatial Strategy for securing planned-for growth during the plan-period. That the Spatial Strategy is in general conformity with the London Plan, specifically that its identified objectives and overarching themes are well aligned with the Mayor of London’s Good Growth objectives. These include those set out under London Plan Policy GG1 building strong and inclusive communities; Policy GG3 creating a healthy city; and Policy GG6 increasing efficiency and resilience.
- 5.9 Furthermore, it is anticipated that the Statement will also signal the Greater London Authority support towards the new Local Plan’s approach for securing appropriate and necessary investment in infrastructure required to support future growth, as set out under the Local Plan’s Spatial Strategy. This specifically includes the approach being taken in respect of strategic transport infrastructure improvements, most notably the Bakerloo Line Extension, which will support the delivery of growth and sustainable place-making beyond the plan period and the Borough boundary. Both partners are expected to confirm that there are no further issues to address in relation to the Local Plan Spatial Strategy.

¹⁷ Under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 21 Conformity with the London Plan

¹⁸ Under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 19 Publication of a local plan

6. Conclusions

- 6.1 In summary, the Council is pursuing Scenario 1, as an appropriate Spatial Strategy for the new Lewisham Local Plan. The Spatial Strategy will secure successful and sustainable place-making through the delivery of the new Plan's site allocations and application of its planning policies. The Spatial Strategy is ambitious – it will secure a significant boost in housing supply and delivery, above that previously experienced across the Borough. Nevertheless, it is deliverable, developable, and can realistically be implemented during the plan-period. The Spatial Strategy ensures that the new Local Plan is appropriately future proofed in anticipation of the additional place-making benefits that will be unlocked through the delivery of the Bakerloo Line Extension.