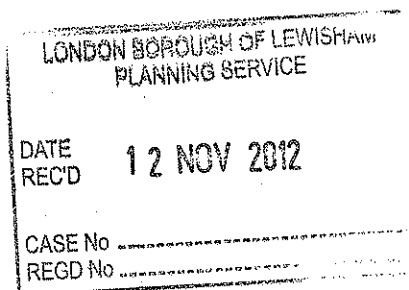


GREATER LONDON AUTHORITY

Mayor's Office

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Our ref: PDU/LDF23/LDD02/
Date: 7 November 2012

Brian Regan
Planning Services
Lewisham Council
5 Floor Laurence House
Catford Road
LONDON SE6 4RU



Dear Mr Regan,

Lewisham Council Local Development Framework: Submission Version of the Site Allocations Local Plan and Lewisham Town Centre Local Plan

Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)

Thank you for your letter of 1 October 2012 consulting me on the above document and requesting an opinion on general conformity.

On 7 November 2012 I considered a report on this matter; reference PDU/LDF23/LDD02/03. This report constitutes my formal representations to the submission version consultation. Please note that this includes representations relating to general conformity with the London Plan as well as other representations to clarify or improve policy.

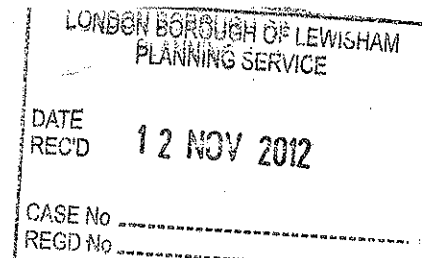
As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. It is my opinion that the submission documents are in general conformity with my London Plan as set out in the attached report.

If you would like to discuss any of my representations in more detail, please contact Lucy Bird (020 7983 5826) who will be happy to discuss and arrange further meetings.

Yours sincerely

Boris Johnson
Mayor of London

cc Len Duvall, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning and Housing Committee
Eric Pickles, Secretary of State
Ian McNally & John Pierce, DCLG
Alex Williams, TfL



planning report PDU/LDF23/LDD02/03

7 November 2012

Lewisham Council

Site Allocations Local Plan and Lewisham Town Centre Local Plan

Submission Version consultation

Lewisham Council Local Development Framework

Town & Country Planning Act 1990 (as amended) ("TCPA"); Greater London Authority Acts 1999 and 2007 ("GLA Act"); Planning and Compulsory Purchase Act 2004 (as amended) ("PCPA"), Town and Country Planning (Local Development) (England) Regulations 2012 ("the Regulations").

Recommendation

That the Mayor agrees to submit the comments set out in this report to Lewisham Council as the formal response to the Submission consultation, and that Lewisham Council be advised that the proposed Submission Documents are in general conformity with the London Plan.

Context

1 On 1 October 2012, Lewisham Council consulted the Mayor of London on the above Document. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period ends on 12 November 2012.

2 The local development framework together with the London Plan and the National Planning Policy Framework (NPPF) provides the essential framework for planning at the borough level. The "development plan" in London for the purposes of section 38(6) of the PCPA is:

- The London Plan (2011), and
- Development plan documents produced by borough councils (and saved unitary development plan policies in transitional period).
- Neighbourhood Plans as appropriate

3 The revised early minor alterations to the London Plan are also a material consideration.

4 There are three types of local development documents: development plan documents (DPDs); supplementary planning documents (SPDs); and Statements of Community Involvement. All of the documents now being consulted on are DPDs with development plan status, which will be subject to an examination to test the 'soundness' of the plan

5 The NPPF states that a plan is "sound" where it is positively prepared, justified, effective and consistent with national policy.

The Mayor's rôle

6 All DPDs must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the PCPA. Section 24(4) of the PCPA requires boroughs prior to submitting it to the Secretary of State to request the opinion in writing of the Mayor of London as to the general conformity of a DPD with the London Plan and advises that they may request the opinion in writing of the Mayor as to the general conformity of any other LDD. The Mayor issues this opinion on DPD general conformity in accordance with Section 24(5) of the PCPA. Further to this Regulation 18 requires general consultation at the pre-submission stage. By virtue of Regulation 21(2) of the Regulations the Mayor has 6 weeks from the date of the request to provide his opinion on whether the DPD is in general conformity with the London Plan.

7 The Mayor of London's comments will be made available on the GLA website www.london.gov.uk.

Previous representations

8 Officer-level representations were made on behalf of the Mayor in relation to Lewisham Council's consultation on its Site Allocations DPD (now Local plan) and Lewisham Town Centre Local Plan (formerly Area Action Plan (AAP)), pre submission version on 23 May 2012 (PDU report ref: LDF23/LDD02/02 and PDU/LDF23/LDD04/04 (reports attached) respectively .

9 With regards to the Site allocations (pre submission document) the representation submitted concluded that the Council proposed some positive policy options that would effectively implement the London Plan and provide managed growth. The changes highlighted within the pre-submission version were positive, and as such, the document was found to be in general conformity with the London Plan.

10 In relation to the Lewisham Town Centre AAP (pre submission document), this document was also found to be in general conformity with the London Plan.

11 For the avoidance of doubt, the comments made in this report supersede the comments made at that time and are made in the context of the London Plan (2011).

Proposed representations

Site allocations Local Plan

12 The Lewisham Site Allocations Local Plan identifies sites in the borough which are likely to come forward for delivery during the lifetime of the Lewisham Local Development Framework (LDF) (2011 – 2026).

13 The majority of the development sites which have been put forward are generally situated within main identified growth areas, which accord with the opportunity areas of Deptford Creek/Greenwich Riverside, and Lewisham, Catford & New Cross. Other large sites are mostly located in areas that have been identified by the Council through the LDF process as areas of regeneration, or within the emerging Lewisham and Catford Town Centre Area Action Plans.

14 Five strategic development sites in the north of the borough (including Convoy's Wharf and Surrey Canal Triangle) have their site allocations details contained within the adopted Core Strategy DPD, and are not duplicated within this document.

15 No sites have been removed from or greatly modified within the latest iteration of the document, as a result of corrections, clarifications, or development occurring during its inception to this submission stage.

16 Various strategic development objectives, including the protection of employment and industrial land, provision of land for housing, and the citing of LVMF strategic viewing corridors from Blackheath Point and Greenwich Park towards St Paul's Cathedral are included within the document. The comments made by the Mayor within the previous reports to the Council have been incorporated within the latest draft which is welcomed and conformity issues are raised.

17 Transport for London (TfL) has replied to the Council under separate cover (dated 30 October 2012) and in doing so TfL recognises that changes have been made since the proposed submission stage with respects to previous representation which are welcomed. TfL's representations largely relate to minor issues around protection of its infrastructure and service provision which is in accordance with the policies of the London Plan.

Lewisham Area Action Plan

18 The comments made by the Mayor within the previous reports to the Council have largely been incorporated within the latest draft. In line with previous iterations, major sites have design guidelines and capacity estimates for housing and other uses. The town centre boundaries amended within the further options report have been carried forward to this iteration. Notably, the document refers to the 2011 further options consultation and the Mayor's comments raised in the previous report, with regards to tall buildings, design, energy and infrastructure have been included.

19 The document is also generally in conformity with the previously considered (strategically referred) proposals for the Lewisham gateway redevelopment, but enables sufficient flexibility for this major regeneration scheme to be delivered flexibly at the detailed application stage, according to local conditions.

20 Transport for London (TfL) has replied to the Council under separate cover (dated 30 October 2012). In summary, its comments are minor, and relate to a number of minor points. Firstly, with regards to public realm improvements TfL request that they are consulted on the details of any development or scheme proposals affecting the TLRN and SRN from an early stage, particularly where junction improvements and/or new crossing facilities are proposed as these may have an impact on traffic flow.

21 TfL suggests an unallocated site in Thurston Road (the site between S5 and S3b and to the north of S3a) is included within the AAP. It is part of the Lewisham Gateway scheme and as such planning permission exists for its use as a replacement bus stand for the facilities currently located within site S1. The development of the stand has not yet commenced but the site is vacant and thus should be treated in the same manner as the Lewisham Gateway scheme.

22 With regards to 'Site S6 – Tesco's block, car park and petrol station', Connington Road has a bus stand and stops and as such any development of or at the site should retain these in-situ, or an alternative agreed with TfL.

23 Lastly TfL suggest that it would be useful for the AAP to contain parking standards for the main use classes. As Lewisham town centre has a high PTAL, it would be expected that the parking standards are at the more restrictive end of borough wide standards. The AAP could also make it clear that the strategy for public parking will only be deliverable if and when the relevant sites are redeveloped and therefore it will take time to realise.

Legal considerations

24 All LDDs must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will be considered by the Inspector as this is the submission stage.

25 The fact that a development plan document is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan.

Conclusion

26 Lewisham Council's Site Allocations Local Plan and Lewisham Town Centre Local Plan documents have not changed substantially from previous editions on which GLA officers provided formal representation and the documents are found to be in general conformity with the London Plan.

For further information, contact the Planning Decisions Unit
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