



# Public Examination of Lewisham Town Centre Local Plan and Site Allocations Local Plan

## London Borough of Lewisham response on the Inspector's Initial Questions 2 (Duty to Cooperate) and 3 (Positive Preparation)

Note the full text of the Inspectors questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/Documents/TC%20Inspector%27s%20queries.pdf>

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### 1 INTRODUCTION

- 1.1 This paper sets out the evidence to demonstrate that the London Borough of Lewisham has fulfilled its duty to co-operate under S33A of the Planning and Compulsory Purchase Act 2004 (as amended) in the process of preparing the Lewisham Town Centre Local Plan (LTCLP1.1a and 1.1b) and the Site Allocations Local Plan (SALP1.1). This includes evidence of co-operation with relevant Local Planning Authorities on 'strategic matters' and other bodies set out in Regulation 4 of the Town And Country Planning (Local Planning) (England) Regulations 2012 and how the Council has engaged 'constructively, actively and on an ongoing basis'. It also summarises how the two Local Plans were 'positively prepared' as detailed in the National Planning Policy Framework (NPPF).
- 1.2 For convenience the answer to the Inspector's two questions are set out separately, however the Council would stress that there is an interrelationship between the two questions and activities to positively prepare the local plans are also evidence of meeting the duty to cooperate and should be read as such.
- 1.3 The process of continuous engagement and consultation regarding the preparation of the LTCLP and the SALP has resulted in no negative representations on the proposed submission Local Plans or the two schedules of recommended modifications (LTCLP1.7 and 1.7a and SALP1.8 and 1.8a) from any of the London Boroughs or from any of the public bodies listed in the 2012 Regulations. Indeed, representations of support were received from the Environment Agency (LREP5; SREP5) and English Heritage (LREP4; SREP12), two of the listed public bodies, approving of changes made as a result of previous engagement and cooperation between the Council and themselves. The Greater London Authority (GLA) has supported the Lewisham Local Development Framework in general. The GLA has been continually involved in the production of the two Local Plans and has provided the Council with letters confirming that both the SALP and the LTCLP are in 'general conformity' with the London Plan 2011 (see LTCLP2.9 and SALP2.9).

- 1.4 The structure of this paper is as follows; section 2 sets out briefly the local, national and regional planning context. Section 3 identifies Lewisham's strategic priorities and shows how the Council has used the strategic priorities identified in the Core Strategy (CSD1.5) to structure its subordinate Local Plans and specifically how it has met its 'duty to cooperate'. Section 4 shows how the Council has positively prepared its Local Plans particularly regarding objectively assessing development and infrastructure need. Section 5 is a brief conclusion.

## **2 PLANNING CONTEXT**

### **Local context**

- 2.1 The London Borough of Lewisham is located in South East London and is bordered by four other boroughs. Greenwich to the east, Bromley to the south, Southwark to the west and Tower Hamlets across the River Thames to the north. Lewisham also has close links to the London Borough of Bexley as a near neighbour to the east. Bexley along with Lewisham, Greenwich, Bromley and Southwark form the South East London Boroughs sub region as defined in the original London Plan 2004.

### **National context**

- 2.2 The requirement for Local Planning Authorities (LPAs) to comply with the Duty to Cooperate comes from S110 of the Localism Act 2011 which amends the Planning and Compulsory Purchase Act 2004 by introducing a new section 33A. Further detail is set out in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 The NPPF provides additional detail on how the duty to cooperate should be fulfilled by LPA's. Paragraph 156 sets out the strategic priorities that LPAs are required to cooperate on and paragraphs 178 – 181 adds detail to the processes that should be undertaken to meet the requirements. Details of the approach taken by the Council to meet this guidance and the accompanying tests of soundness is set out in sections 3 and 4 of this paper.

### **Regional context**

- 2.4 As a London borough, Lewisham has retained a regional strategy through the London Plan (2011) as defined by the Greater London Authority Act 1999, section 334. This has a considerable bearing on the approach to regional and sub-regional strategic planning across London. For many strategic issues the Mayor of London engages the London Boroughs in the process of providing 'cooperative' regional and sub regional solutions. A good example is that the Mayor coordinates the work of the London boroughs in producing a London wide Strategic Housing Land Availability Assessment, thus negating the need for this work to be tackled at a local level.
- 2.5 Similarly, Lewisham as a Borough ensures that the Mayor of London is engaged constructively, actively and on an ongoing basis with the process of producing the Lewisham LDF and in particular the Local Plan documents. For example, in addition to the formal consultation that has taken place at each stage of Local Plan preparation, the

GLA have a named contact officer who we discuss issues with prior to the formal consultation. As a consequence of this continuous process of active engagement, all strategic issues raised during the preparation stages of the LTCLP and SALP have been resolved and the Mayor of London has provided no objections to either the proposed submission consultations or the schedule of recommended modifications consultations of either the LTCLP or the SALP and has confirmed that both plans are in general conformity with the London Plan (see LTCLP2.9 and SALP2.9). Further evidence of this engagement process can be seen in the consultation response from the Mayor of London for the LTCLP, which acknowledges improvements made to the plan following previous rounds of engagement and cooperation.

### **3 CO-OPERATION REGARDING STRATEGIC MATTERS**

#### **What are Lewisham's strategic priorities?**

3.1 Paragraph 156 of the NPPF sets out those planning matters that are considered strategic priorities and should be delivered by strategic policies. The Lewisham Core Strategy sets out the strategic policies for the borough and these policies reflect those priorities set out in the NPPF paragraph 156. The Core Strategy sets out eleven strategic objectives that are measurable so that in future the Council can report back to the community on what progress has been made on implementing the Core Strategy. The eleven strategic objectives of the Core Strategy are grouped into five main strategic themes as follows:

- Regeneration and growth areas
- Providing new homes
- Growing the local economy
- Environmental management
- Building a sustainable community

3.2 The Council recognises the Core Strategy as the primary Development Plan Document and all other Local Plans including the LTCLP and SALP implement the strategic objectives of the Core Strategy. To underline the connection and the inter-relationship the same strategic themes are used to organise the structure of the LTCLP and the SALP and will be used to support the development of the remaining emerging Local Plans.

#### **How has the Council cooperated with neighbouring planning authorities regarding the strategic priorities identified?**

3.3 Appendix 1 contains five tables that detail the cooperative activities that have supported the development of policies and sites to deliver each of the strategic objective themes and the outcomes of those activities. These detailed activities show how the Council has fulfilled its legal duty to cooperate in relation to the LTCLP and the SALP.

*Note: there is no individual section for the strategic objective theme of 'Regeneration and growth areas' set out below as discussions regarding this spatial area have been undertaken on a subject basis, e.g. providing new homes in the regeneration and growth*

*area is normally dealt with through the same cooperative activities that deal with providing new homes across the whole of the borough.*

- 3.4 In summary, the key outcomes of the activities identified in Appendix 1 are listed below along with details of any consequential influences on the strategies and policies used in the Local Plan. Due to the interconnected nature of policies in the Core Strategy and the policies and site allocations of the LTCLP and SALP, the influence upon all three plans have been included.

Strategic objective theme – Providing new homes:

- 3.5 The provision of new homes is a strategic priority at all levels of planning in the UK, including within London, and Lewisham consider this to be one of the main strategic priorities for the Borough. While the London Plan sets targets for the delivery of housing volumes for the region as a whole and by Borough, it remains for sub-regions and LPAs to consider how and where housing is delivered and to what mix and tenure. Table 1.1 in Appendix 1 details the cooperative activities that have influenced the development of the housing strategy and policies in the Local Plans. The key activities undertaken and subsequent influences on LTCLP and SALP are summarised below.
- 3.6 Core Strategy – The sub-regional South East London Strategic Housing Market Assessment (SHMA) (CSD2.3) was developed cooperatively with the four other South East London Boroughs (Southwark, Greenwich, Bromley and Bexley). It provides the evidence upon which the Core Strategy approach to housing delivery is based, in particular the Core Strategy Spatial Policies (1 to 6) and Core Strategy Policies 1 and 2.
- 3.7 LTCLP and SALP – The submitted Local Plans propose to deliver a considerable amount of housing. The approach in the LTCLP and SALP is consistent with and seeks to implement the housing strategy set out in the Core Strategy Spatial Policies. As such the submitted plans reflect the approach agreed in the South East London SHMA (CSD2.3).
- 3.8 Engagement with neighbouring boroughs in the production of the housing strategies and policies for the Local Plans resulted in zero negative representations. The GLA have also confirmed that both plans are in general conformity with the London Plan.

Strategic objective theme - Growing the local economy

- 3.9 The protection and promotion of growth of economic activity and local businesses is a key objective for the borough and across the wider sub-region. It is also one of the three pillars of sustainable development that is supported by the NPPF. Table 1.2 in Appendix 1 details the cooperative activities that have influenced the development of the economic strategy and policies in the Local Plans. The key activities undertaken and subsequent influences on Local Plan policies are summarised below

- 3.10 Core Strategy – The Retail Capacity Study (RCS) (CSD2.14) considers sub-regional data and catchments. The RCS provides the basis for the retail strategy in the Core Strategy and in particular the Core Strategy Spatial Policies (1 to 6) and Core Strategy Policy 6 (Retail hierarchy and location of retail development). Engagement with neighbouring boroughs was undertaken regarding both the Core Strategy and the retail strategy. Proposals for the redevelopment of former Strategic Industrial Locations in to Mixed Use Employment Land in the Core Strategy was based on both local and regional evidence (Lewisham’s Employment Land Survey (CSD2.6)). A number of discussions took place between Lewisham and GLA officers to reach agreement on this strategic planning matter.
- 3.11 LTCLP and SALP – The approach towards retail provision in the LTCLP and SALP is consistent with and seeks to implement the retail strategy set out in the Core Strategy Spatial Policies. As such the submitted plans reflect the approach agreed in the RCS (CSD2.14), via the Core Strategy. The LTCLP economic policies also reflect and support Lewisham’s Employment Land Survey (CSD2.6) which uses sub-regional data. The economic strategy for the LTCLP has been discussed at Economic Development meetings with adjacent boroughs and other boroughs and no objections have been received. As with the Core Strategy, the approach to the redevelopment of former Strategic Industrial Locations in to Mixed Use Employment Locations in the SALP has been influenced by the regional evidence base and by discussion with GLA officers representing the Mayor of London.
- 3.12 Engagement with neighbouring boroughs in the production of the retail and employment strategies and policies for the two Local Plans resulted in no negative representations being received. The GLA have also confirmed that both submitted plans are in general conformity with the London Plan.

#### Strategic objective theme - Environmental management

- 3.13 Environmental management is another key national priority and one of the three pillars of sustainable development that is supported by the NPPF. This objective theme includes strategic matters relating to, climate change, flood risk and water management, open space and waste. These are strategic matters that cross borough boundaries and that require cooperative action. Table 1.3 in Appendix 1 details the cooperative activities that have influenced the development of Local Plans in terms of environmental management. The key activities undertaken and subsequent influences on the two Local Plan policies are summarised below
- 3.14 Core Strategy – The Ravensbourne River Corridor Improvement Plan (RRCIP) (CSD2.12), produced cooperatively with the Environment Agency (EA) contributed significantly towards the approach to rivers and flooding in Core Strategy Policies 10 and 11. Monthly ‘surgeries’ between the Planning Service and the EA were equally valuable in ensuring a resilient and robust approach to dealing with flood management. Core Strategy Policy 13 details the Councils approach to waste management which is directly based upon the sub-regional evidence base – the South East London Boroughs’ Joint

Waste Apportionment Technical Paper (CSD2.20), produced jointly by the South East London Boroughs of Lewisham, Southwark, Greenwich, Bexley and Bromley.

- 3.15 LTCLP and SALP – Both the LTCLP and SALP were discussed with the EA at inception stages of the further options versions in 2010 and hence the approach to environmental and flood management matters for both plans was agreed early. Discussions have been held regularly with the EA throughout the plan production process using the EA and Planning Service monthly ‘surgeries’. This cooperative approach is evidenced by the continuing supporting comments received from the EA at each stage of consultation. For Lewisham town centre, many of the development sites directly border the rivers and the majority of the town centre is at some risk of flooding. It has been central to making the plan that the EA have been actively involved at every opportunity. The approach to decentralised energy in Lewisham town centre is guided by the Decentralised Energy Master Planning programme (DEMaP) work undertaken at a regional level by the GLA which identify opportunities and the feasibility of decentralised energy projects in London. The LTCLP expands upon the regional data to allocate appropriate locations in the town centre. The SALP allocates waste sites in the north of the borough as a direct response to the evidence provided by the sub-regional technical waste paper. (CSD2.20).
- 3.16 Engagement with neighbouring boroughs in the production of policies relating to open space, rivers and flood management, climate change, waste and other environmental matters for the two Local Plans resulted in no negative representations. Previous comments from the GLA regarding electric vehicles have been incorporated as changes to the LTCLP and they have now confirmed that both plans are in general conformity with the London Plan.

#### Strategic objective theme - Building a sustainable community

- 3.17 As the final of the three pillars of sustainable development identified in the NPPF, the social theme is intended to support strong, vibrant and healthy communities. This includes strategic planning matters relating to, transport, accessibility, character, health and social and cultural well-being that are priorities for both local and regional planning. Table 1.4 in Appendix 1 details the cooperative activities that have influenced the development of sustainable Local Plans. The key activities undertaken and subsequent influences on Local Plan policies are summarised below.
- 3.18 Core Strategy – The Infrastructure Delivery Plan (IDP) (CSD2.17) influenced the development of Core Strategy Policies 14, 19 and 20 which set out the approach to sustainable transport, community and leisure facilities and schools and health services in the borough. The IDP uses cross-borough-boundary information and was produced using a series of cooperative meetings and discussions with a large list of local authority and other public bodies, that is detailed in Appendix 2 of the IDP. Separate and regular meetings with Transport for London (TfL) and other borough transport colleagues ensured the approach to transport policies in all Local Plans is aligned with the sub-regional and regional context. The same can equally be said for the meetings with health

and leisure colleagues from within the borough and elsewhere in the sub-region, directly shaping Core Strategy policies.

- 3.19 LTCLP and SALP – The IDP includes a focused section on Lewisham town centre, ensuring that the same process outlined above also impacted on the development of infrastructure priorities and policies in the LTCLP. Similarly, a focused IDP section on the Regeneration and Growth Area of Deptford and New Cross influenced the approach to infrastructure in the SALP. In depth discussions at the regular meetings with TfL shaped the LTCLP policy relating to sustainable transport and several of the Town Centre Area and site based policies, particularly including those bordering the railway station and the Ladywell Leisure Centre site. None of the sites in either the SALP or the LTCLP are sufficiently large enough on their own to cause issues with the provision of social infrastructure facilities on a cross borough basis.
- 3.20 Engagement with neighbouring boroughs in the production of policies relating to sustainability matters for the Local Plans resulted in no negative representations. Previous discussion and comments from the GLA regarding public transport developer contributions and other site specific transport concerns have been incorporated as changes to the LTCLP and they have now confirmed that both plans are in general conformity with the London Plan.

#### **General cooperative activities undertaken in support of strategic planning**

- 3.21 So far section 3 has only considered those cooperative activities that have a direct influence on an identified strategic priority for Lewisham. However a number of activities are undertaken by the Council to cooperate with other boroughs and public bodies regarding the wider strategic approach to local, sub-regional and regional planning. Table 1.5 in Appendix 1 details a number of these activities.
- 3.22 Many of the activities in Table 1.5 have had a strategic impact on the Lewisham Local Development Framework, dealing with general approaches towards planning at the local / regional level and the sharing of best practice and common experiences.
- 3.22 Lewisham Planning Service liaise regularly with other borough's planning teams and also with other departments within Lewisham Council such as education, housing, open space and leisure services and other public bodies such as public health. These colleagues then attend regional and sub-regional meetings with their peers to ensure that relevant information and discourse is shared. This positive activity, directly influences the understanding of infrastructure provision in Lewisham town centre and in the vicinity of sites in the SALP. This means that such positive discussion has an impact on decisions made for each of the sites regarding the appropriateness of the proposed development and also the potential need for planning obligations.
- 3.23 Regular discussions are held with neighbouring boroughs and appropriate landowners and developers with regard to particular development sites or groups of development sites. This has happened on many occasions for the Deptford / New Cross area, where

discussion has helped provide the detailed needs of a number of sites in the SALP, in particular relating to transport requirements.

### **How has the Council cooperated with the public bodies listed in the TCPA Regulations regarding the strategic priorities identified?**

3.24 Many of the activities detailed above have included cooperative measures undertaken with a number of the public bodies listed in PART 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012. Further detail is also available in Appendix 1. This detail will not be repeated below, rather the following will briefly describe how the council has interacted with each body.

Civil Aviation Authority – Regular engagement through consultation processes. No strategic planning matters were raised, no further discussions were required and no representations received. The Tall Buildings Study (CSD2.31) includes references to safeguarding maps and consultation is undertaken with the Civil Aviation Authority regarding relevant planning applications.

English Heritage (EH) – Extensive discussions and meetings take place on a regular basis and in particular while producing the Core Strategy there were a number of discussions concerning heritage and tall buildings matters. This dialogue enabled the approach in the LTCLP and SALP to be tailored to meet the expectations of EH. There was also direct input by EH into the SA process (including the SA scoping reports) which in turn impacts the plan production. The early engagement has ensured that there have been no negative representations received from EH.

Environment Agency (EA) – The Environment Agency and the Council have worked cooperatively on a number of projects and on a regular basis. This is an ongoing process and has led to exemplary results as detailed in previous paragraphs.

Highways Agency – Regular engagement through the consultation processes. No further discussions requested or required as no strategic matter was of concern and this is reflected in the fact that no negative representations were received on the two local plans.

Highway Authorities – See entry for TfL.

Homes and Communities (HCA) – In London the HCA now only exists as a regulator. Responsibility for housing and regeneration activity in London lies with the Greater London Authority. Regular engagement was undertaken with the HCA through consultation processes. No further discussions were requested or required as no strategic matter was of concern and this is reflected in the fact that no negative representations were received on the two local plans.

Integrated Transport Authorities – See entry for TfL.



Local Enterprise Partnerships (LEP) – In London the LEP is lead and organised by the Mayor of London, who is consulted and engaged with regularly by Lewisham Council. For many strategic issues the Mayor of London engages the London Boroughs in the process of ‘cooperative’ activity thus negating the need for this to be tackled at a local level. Similarly, Lewisham as a Borough ensures that the Mayor of London is engaged with the process of producing the Lewisham Local Plan bringing consistency to the approach to planning. As a consequence, the Mayor of London has provided no objections to the proposed submission consultations of either the Lewisham Town Centre Local Plan or the Site Allocations Local Plan and has confirmed that both plans are in general conformity with the London Plan.

Marine Management Organisation (MMO) – Consultation with the MMO has taken place since the proposed submission versions of the LTCLP and the SALP. No further discussions are required as there have been no negative representations received. Additionally, as the rivers in Lewisham town centre are not tidal, the MMO does not have jurisdiction over the LTCLP.

Mayor of London – For many strategic issues the Mayor of London engages the London Boroughs in the process of cooperative activity thus negating the need for this to be tackled at an individual local level. Similarly, Lewisham as a Borough ensures that the Mayor of London is engaged with the process of producing the Lewisham Local Plan bringing consistency to the approach to planning. As a consequence, the Mayor of London has provided no objections to the proposed submission consultations of either the LTCLP or the SALP and has confirmed that both plans are in general conformity with the London Plan.

Natural England – Regular engagement through consultation processes. No further discussions requested or required as no strategic matter was of concern and this is reflected in the fact that no negative representations were received on the two local plans. Natural England had direct input to the SA process (including the SA scoping reports) which in turn impacts the plan production.

Office of Rail Regulation (ORR) – A dialogue has been initiated with the ORR and an e-mail sent requesting feedback regarding the submitted plans. No representations or comments have been received from the ORR and the Council do not believe there are any issues.

Agency Primary Care Trusts – The Lewisham Primary Care Trust (PCT) and other Lewisham responsible public health bodies are engaged regularly in the local planning process. Most notably, in producing the IDP evidence base document, extensive meetings and discussions were undertaken. Both submitted local plans contain local health decisions that are supported by those who organise health facilities in the borough. The PCT had direct input to the SA process (including the SA scoping reports) which in turn impacts the plan production.

Transport for London (TfL) – Engagement with TfL is undertaken on a regular basis as is described in Appendix 1. This is a continual set of meetings that ensure cooperation between TfL and Lewisham Council when producing Local Plans and implementing them. Comments form part of the response from the GLA.

#### **4. POSITIVE PREPARATION**

4.1 Paragraph 182 of the NPPF requires that LPA's submit a plan for examination that is sound. In order to be found sound a plan must be positively prepared, as defined below:

*“the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development” NPPF para 182.*

4.2 Section 3 detailed the cooperative activities undertaken in relation to selected strategic priorities in response to the requirements of the PCPA 2004 (as amended). The wider approach to positive planning in the borough also requires discussion and action in a cooperative manner to meet collective needs. This principle is identified in the NPPF, paragraph 182.

4.3 Lewisham Council has engaged positively and cooperatively throughout a positive plan-making process with:

- neighbouring local authorities, both individually and as part of positive planning groups and forums on a sub-regional and London-wide basis
- other government organisations, particularly relating to local and regional infrastructure
- local residential and business communities have also been regularly engaged and consulted.

#### **Objectively assessed development and infrastructure requirements**

4.4 Section 3 has detailed discussions that have occurred regarding a number of the key evidence base documents produced to support the development of the LTCLP and the SALP. For a full list of the relevant evidence base reports see the plans submission library references CSD2.1 – CSD2.49.

4.5 The evidence base documents have, on the most part, been produced by independent consultancies, who have objectively assessed the development needs of Lewisham when recommending the policy approach to be taken forward. For infrastructure requirements, the Strategic Infrastructure Framework (CSD2.16) used an industry standard database tool that utilised standard assumptions from recognised sources to objectively establish the infrastructure requirements of the borough. This information has then been used to help produce the Infrastructure Delivery Plan (CSD2.17) which supports the Local Plans.

## **Meeting unmet requirements from neighbouring authorities**

- 4.6 The information and any policy recommendations found in the evidence base were discussed as required with neighbouring LPAs through the cooperative activities identified in section 3 and detailed in the Appendix Tables 1.1 – 1.5. In fact, on a number of occasions the evidence base documents were produced collaboratively through the cooperative activities. For example, the SHMA (CSD 2.3) was jointly commissioned by the five south east London boroughs and objectively assesses housing need in the sub region. The South East London Boroughs' Joint Waste Technical Apportionment Paper is another example of positive planning to meet the waste apportionment from the London Plan on a cooperative basis. This work identified a mechanism for the boroughs to share the waste apportionment. No such requirement emerged from the SHMA evidence study of housing need.
- 4.7 Apart from the waste apportionment, no requirements were made of Lewisham to provide for any other unmet need of neighbouring boroughs. Additionally, there have been no responses to formal consultations regarding the Core Strategy, the LTCLP or the SALP that have requested Lewisham to meet any unmet requirements of neighbouring boroughs.

## **5 CONCLUSIONS**

- 5.1 The Council is aware that the duty to cooperate and the need for positive action with neighbouring boroughs does not cease once a plan is submitted and adopted. The positive engagement and cooperative processes that have been established through each local plan production cycle with neighbouring boroughs and other bodies will be continually maintained and enhanced. This will be an important input to ensuring the successful delivery of the local plans and monitoring progress towards meeting their objectives and realising the Council's vision.
- 5.2 The LTCLP implementation section details the Council's proposed approach to partnership working as part of its delivery strategy. A number of cooperative projects are already planned for the coming years including refreshing a number of the joint evidence studies such as the SHMA and the IDP, producing other guidance documents such as the River Ravensbourne Catchment Improvement Plan with the EA and LB Bromley and Greenwich and a continuing programme of site specific engagement.
- 5.3 The evidence presented in this paper shows the LTCLP and the SALP have been positively prepared and have met the requirements of S33A of the PCPA 2004 (as amended) regarding the duty to cooperate.

## Appendix 1 – Cooperative activities and outcomes

### **Strategic objective theme – Providing new homes**

Table1.1: Providing new homes

Activity	Process	Outcomes
EVIDENCE DOCUMENTS - South East London Strategic Housing Market Assessment (SHMA) (CSD2.3)	With the assistance of consultants the South East London SHMA (CSD2.3) was produced in 2009 to support local plan making across the sub-region. The boroughs involved in the project were Bexley, Bromley, Greenwich, Lewisham and Southwark.	The South East London SHMA (CSD2.3) has allowed the five councils to explore how housing markets operate across the area and assess housing need and demand on both a boroughwide and sub-regional basis, to inform the development of planning and housing strategies. The production of a sub-regional evidence base ensured that the impact of potential strategies in one borough on another borough was acknowledged and understood. This has allowed Lewisham and the other four boroughs involved to ensure housing planning policies are consistent and aligned towards the same objectives.
MEETINGS – South East London Housing Partnership	The Partnership is made up of the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark and includes the Homes and Communities Agency, and housing association partners. The Partnership meets regularly and strategic housing and planning concerns are discussed through the forum.	The basis of the forum is in sharing information and ensuring that there is a consistent approach to housing across the south east sub-region of London. Lewisham has both made presentations regarding its Local Plans (at options stage and publication) and been present for a number of reciprocal presentations from other boroughs. The evidence base document discussed above, the South East London SHMA (CSD2.3), was produced by the South East London Housing Partnership and ongoing discussions take place to ensure it is reviewed as appropriate.
MEETINGS – Lewisham Housing Association Group	This is a group that contains Lewisham Council Housing representatives as well as local housing associations who manage and operate the housing stock in Lewisham and adjacent boroughs. Regular meetings are held and when appropriate, members of the Planning Team attend to present and discuss the emerging local plans	The group uses communication and discussion of the latest ‘hot topics’ and key issues to share common approaches and promote best practice. Advice and guidance for the forum has helped to mould the finer points of the Local Plan housing policies.

### **Strategic objective theme - Growing the local economy**

Table 1.2: Growing the local economy

Activity	Process	Outcomes
EVIDENCE DOCUMENTS - Retail Capacity Study (RCS)	The RCS (CSD2.14), produced in 2009, uses a large base of information that includes existing and planned retail floorspace in both	Information regarding the retail capacity of town centres across the south east sub-region has been shared between boroughs, providing a comprehensive evidence base. This has influenced

Activity	Process	Outcomes
(CSD2.14)	Lewisham, surrounding boroughs and key town and shopping centres further afield.	the retail strategy and policies in place in the Local Plan and mitigated against the likelihood of contradictory policy between boroughs.
EVIDENCE DOCUMENTS – Employment Land Study (ELS) (CSD2.6)	The ELS (CSD2.6), produced in 2008, looks at employment land use and allocation across the borough, using sub-regional data. The ELS was agreed in discussion with the GLA and is in line with the London Plan and industrial land release benchmarks. Meetings with the GLA were held in 2008/2009 to discuss how the ELS would be translated into local policy.	Close working with the GLA has ensured a robust and regionally acceptable local employment strategy and policies were included in the Local Plan.
MEETINGS – Economic development meetings	The Planning Policy Team have worked closely with Economic Development colleagues in the Council in producing the Local Plan. The Planning Policy Team regularly meet the Economic Development Team, who then get actively involved in and engaged with many cross borough forums and projects that align practices and deliver results across the sub region and Londonwide. Examples include London Councils meetings, the South East London Chamber of Commerce meetings and individual projects regarding community development, worklessness, business advice and Crossrail.	Using shared expertise and practices, the Lewisham Economic Development Team have influenced the approach of Local Plans to encouraging economic growth in the borough. This is particularly the case with the policies for Lewisham town centre that are seeking to develop an active and vibrant economy.

### **Strategic objective theme - Environmental management**

Table 1.3: Environmental management

Activity	Process	Outcomes
EVIDENCE DOCUMENTS - River Ravensbourne Corridor Improvement Plan (RRCIP) (CSD2.12)	The RRCIP (CSD2.12) is an evidence base document supporting the Core Strategy completed in 2010. The production of the RRCIP (CSD2.12) was completed as a joint project between Lewisham Council and the Environment Agency.	<p>A close working relationship between the Planning department and the Environment Agency developed during the production of the RRCIP (CSD2.12) has been continued through the monthly surgeries detailed below and will be taken forward through the European funded boroughwide River Catchment Improvement Plan.</p> <p>The resulting improvement plan influenced directly the approach and strategy to the rivers in Lewisham and subsequent policies in the Core Strategy and the LTCLP.</p>

Activity	Process	Outcomes
MEETINGS - Monthly Environment Agency Planning Surgery	A planning officer from the Environment Agency spends one day a month working from the Lewisham Planning Office and is available for meetings and discussions with officers. This arrangement has been in place since March 2010 and is ongoing.	The monthly surgeries have provided a forum where convenient regular liaison between the two bodies has allowed the monitoring of progress of both the EA plans and the Lewisham local plan. Regular discussion allowed the subsequent quick resolution of any concerns during the plan production stage.
MEETINGS – London Environmental Co-ordinators Forum	<p>This is a quarterly meeting which enables cross borough discussion of key environmental and sustainability issues and practices.</p> <p>The meeting is attended by the Council's Sustainability Manager, with whom regular internal meetings are held with by the planning team.</p>	This communication channel has ensured that sustainability experts from all London boroughs have shared information about the environmental planning policies proposed. This has led to a consistency of approach.
EVIDENCE – Decentralised Energy Master Planning (DEMaP)	The DEMaP study undertaken by the Mayor of London provides a 'heat map' of all London boroughs, showing where decentralised energy hubs may be appropriate.	The DEMaP study results provide the basis for policy regarding decentralised energy in the Lewisham Local Plans, including the Core Strategy and the LTCLP. The regional DEMaP study made it possible to know where to pin point for further local in depth study.
MEETINGS AND EVIDENCE DOCUMENTS - South East London Boroughs' Joint Waste Apportionment Technical Paper (CSD2.20)	The South East London Boroughs' Joint Waste Apportionment Technical Paper (CSD2.20) was produced in 2010 in conjunction with the neighbouring boroughs of Bexley, Bromley, Greenwich and Southwark and supported the Core Strategy. The boroughs as a group are known as the South East London Waste Group and meet regularly to progress / monitor the waste strategy for the south east sub-region.	The document identifies the sub-regional requirements for waste management facilities and details how the London Plan waste apportionment will be met both as a sub-region and on a borough basis. This cooperative work directly influences policies in the Core Strategy and the Site Allocations Local Plans.
MEETINGS – Open space and biodiversity	<p>Lewisham planners meet regularly with colleagues regarding open space, ecology and biodiversity in respect of individual planning developments and the wider planning strategy.</p> <p>Subsequently, Lewisham ecology and parks officers attend regional and sub-regional meetings including the London Boroughs Biodiversity Forum, the South East London Green Chain Walk working party and the London Parks Benchmarking Group.</p>	A communication channel has been established between the boroughs regarding the strategy for open space and biodiversity, with a route for planners to both influence and be influenced by the group through colleagues with environmental expertise.

**Strategic objective theme - Building a sustainable community**

Table 1.4: Building a sustainable community

Activity	Process	Outcomes
<b>Physical infrastructure</b>		
<p>EVIDENCE DOCUMENTS - Infrastructure Delivery Plan (IDP) (CSD2.17)</p>	<p>The IDP (CSD2.17) was produced to support the development of the Core Strategy in 2010. The document contains a large base of information of existing, planned and required infrastructure. In the main, this data relates to the Borough of Lewisham, but it also contains shared information for the bordering boroughs of Bromley, Greenwich and Southwark regarding transport, education, health and leisure facilities. (See Appendix 2 of the IDP)</p> <p>A number of regular meetings were held with key infrastructure stakeholders including, the local Primary Care Trusts, the local education department, other Council departments and public and private bodies such as TfL to identify details of existing and required infrastructure and establish a plan to deliver them.</p>	<p>A regular meeting schedule and a good working relationship was established with key infrastructure stakeholders and this remains to this day as part of the continual monitoring process of the local plan.</p> <p>The sharing of available data with neighbouring boroughs has ensured that double counting of need and hence the over supply of services is avoided.</p> <p>Strategic policies relating to the provision of physical transport infrastructure have been influenced by the information collated in the IDP (CSD2.17).</p>
<p>MEETINGS - TfL Planning Co-ordination meeting</p>	<p>Meetings are held every two months between the Planning Policy and Development Management teams at Lewisham and the TfL Borough Planning Area Manager for South East London. These meetings have been in place since early 2010.</p>	<p>These meetings include a regular update from Lewisham policy planners on the progress of producing a local plan and the key content and decisions regarding transport systems. The meetings provide an appropriate forum to assess the impacts of the local plan upon TfL and discuss any concerns and solutions required, during the plan production stage.</p> <p>The meeting also provided a good opportunity to discuss and understand the transport elements of the emerging London Plan 2011.</p>
<p>MEETINGS – Sub regional transport meetings</p>	<p>Lewisham planners meet regularly with colleagues in the transport department regarding both individual schemes and developments and the wider strategy. The Lewisham transport planners subsequently attend The East and South East London Transport Partnership (including transport managers from the boroughs of Lewisham,</p>	<p>A communication channel is established between the boroughs regarding transport strategy, with a route for planners and the planning strategy to both influence and be influenced by the group.</p>

Activity	Process	Outcomes
	Greenwich, Bexley and the north-eastern boroughs). Additional quarterly meetings are held with the London Borough of Southwark.	
<b>Social infrastructure (including health, security, community and cultural facilities)</b>		
EVIDENCE DOCUMENTS - Infrastructure Delivery Plan (IDP) (CSD2.17)	<p>The IDP (CSD2.17) was produced to support the development of the Core Strategy in 2010. The document contains a large base of information of existing, planned and required infrastructure. In the main, this data relates to the Borough of Lewisham, but it also contains shared information for the bordering boroughs of Bromley, Greenwich and Southwark regarding transport, education, health and leisure facilities. (See Appendix 2 of the IDP)</p> <p>A number of regular meetings were held with key infrastructure stakeholders including, the local Primary Care Trusts, the local education department, other Council departments and public and private bodies such as TfL to identify details of existing and required infrastructure and establish a plan to deliver them.</p>	<p>A regular meeting schedule and a good working relationship was established with key infrastructure stakeholders and this remains to this day as part of the continual monitoring process of the local plan.</p> <p>The sharing of available data with neighbouring boroughs ensures that double counting of need and hence the over supply of services is avoided.</p>
MEETINGS – Health meetings and events	<p>Quarterly meetings are held attended by representatives of the Lewisham Planning Policy Team and the Lewisham Public Health Team.</p> <p>There have also been a number of sub-regional strategic health planning events over the past few years which have been attended by a combination of the Lewisham Council Planning Policy Team and Lewisham Public Health representatives. Meetings include, Shaping London’s public health – Partnership working in action (March 2011) and a number of events organised by the Healthy Urban Development Unit, most recently in Autumn 2011 (health and planning) and Spring 2012 (community infrastructure levy).</p>	<p>During a period of much transition for the NHS and public health provision, it has been important to retain communication channels between local health and local planning. Regular meetings are held between the two departments and sub-regionally to ensure that the emerging local plans represent the health needs of the borough.</p>
MEETINGS –	Lewisham planners meet regularly	A communication channel is established between the



Activity	Process	Outcomes
Sub-regional leisure meetings	with colleagues in the leisure department, who subsequently attend the Chief Leisure Officers meeting for the sub-region of East London and also a London-wide version.	boroughs regarding leisure strategy, with a route for planners to both influence and be influenced by the group.

### **General cooperative activities**

Table 1.5: General cooperative activities

Activity	Process	Outcomes
MEETINGS - South East London Policy Group (SELPG)	The SELPG has been meeting since 2008, most recently in August 2012, and is programmed to continue to meet quarterly on an ongoing basis through 2013. The group is at officer level involving the Planning Policy Managers or equivalent for each of the boroughs that make up the South East London sub-region, including Bexley, Bromley, Greenwich, Lewisham and Southwark.	<p>The purpose of the meetings is planning policy based and therefore particularly focused on the production of the key strategic elements of the local plan documents, the supporting evidence base and any supplementary guidance.</p> <p>Through attendance at the SELPG meetings and contribution to and comment on the draft local plan documents at each stage of the production process, neighbouring authorities have been able to influence the format and content of the Lewisham local plan and vice versa. Close consideration of the strategic sites and policies within the local plan has been essential in delivering an effective plan.</p>
MEETINGS - Association of London Borough Planning Officers	A well established London wide officer group, meeting two monthly, comprising representatives of all London boroughs as well as from the GLA, TfL, other public bodies and the former Government Office for London.	The group meets every 2 months to discuss the production of the London borough's local plans and other planning matters. While this course of meetings are not solely focused on local plans or on Lewisham specifically, they are a forum for the wider discussion of cross borough strategic issues and an opportunity to identify shared concerns and commence strategic discussions. Examples include the Londonwide Strategic Housing Land Availability Assessment and the Thames Tunnel proposals.
MEETINGS – Cross-borough	A series of meetings took place in 2010 with colleagues from the boroughs of Greenwich and Southwark to discuss development sites and issues in the Deptford / New Cross locale. These meetings included representatives from planning policy development management and transport planning. The meetings were initiated at plan preparation stage to ensure a coordinated approach between Lewisham's emerging Core Strategy, Southwark's emerging Canada Water AAP and	The Deptford / New Cross area contains large strategic sites within Lewisham (allocated in the Core Strategy), proposals for growth at Canada Water (LB Southwark) and development of large sites within Greenwich that necessitate cross-boundary discussion. The meetings influenced a common approach and consideration of potential development impacts particularly for traffic and transport issues. Meetings continue on an ad-hoc basis as and when considered appropriate for DPD preparation,

Activity	Process	Outcomes
	emerging LDF issues for Greenwich..	
COMMUNICATIONS - Consultation letters and CDs	At each formal consultation stage in the production of all local plans every statutory consultee and south east London borough has received a letter to inform them of the consultation detail and process. Since 2009, CD's containing the local plan document and all supporting documents and evidence have been included as part of the formal consultation.	<p>There have been no negative responses from any London boroughs in response to the consultations at any stage of the process of producing either the LTCLP or the SALP. The GLA had a number of minor objections to the LTCLP at the further options consultation stage. These were mostly factual amendments and were incorporated into the production of the proposed submission version. As a result, there are now no objections from the GLA and Lewisham has received confirmation of conformity with the London Plan from the Mayor of London.</p> <p>In response to the further options consultation, English Heritage and the Environment Agency objected to the approach taken in the LTCLP towards tall buildings and river enhancement respectively. Since then discussions have occurred with both parties resulting in a reassessment of the local plan approach. At the proposed submission consultation both English Heritage and the Environment Agency responded with support for the amended plan and no objections.</p> <p>Following the proposed submission consultation for the LTCLP there are five modifications recommended by the LPA to reflect changes requested by TfL, one modification for Thames Water and one for the Metropolitan Police Service.</p>
COMMUNICATIONS - Meetings, workshops, events	As part of the consultation on the LTCLP Further Options a public exhibition was held in the town centre with all stakeholders invited to attend and discuss the plans. Further a number of meetings with different groups were held and invites for further meetings extended to all statutory and non-statutory bodies.	Feedback from the public exhibition and all meetings and workshops at the LTCLP further options stage was used to influence the production of the proposed submission version. (For further detail, see LTCLP1.10 Consultation Statement).
COMMUNICATIONS - Reciprocated events	Planning policy officers from Lewisham have had a series of meetings with colleagues from neighbouring boroughs regarding their local plan documents.	In order to judge the appropriateness of the Lewisham Local Plan in relation to other local plans, it is important to understand what is included in neighbouring borough local plans. Therefore planning policy officers from Lewisham have attended a number of meetings including those relating to the Southwark and Greenwich Core Strategies and the Canada Water Area Action Plan.