

Lewisham Local Plan: Statement of Common Ground between London Borough of Lewisham and London Borough of Bexley

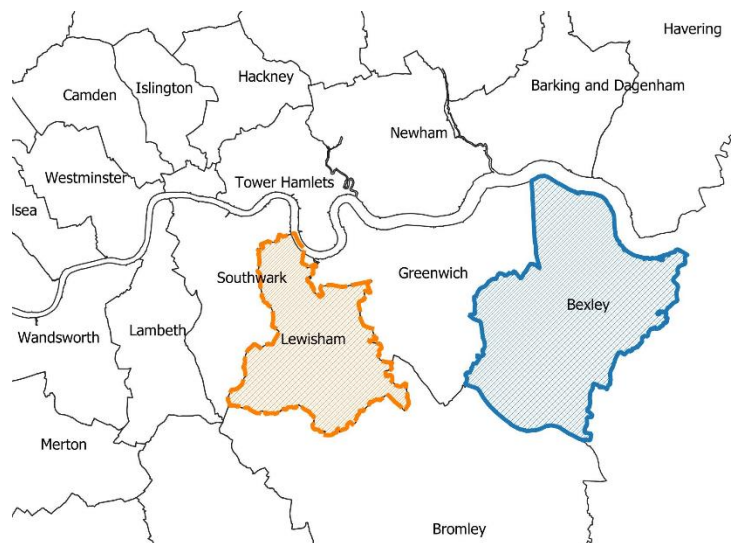
Submission Stage (Regulation 22)
October 2023

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) sets out details of the joint working and cooperation between neighbouring local planning authorities (LPAs). It demonstrates that strategic cross-boundary matters relevant to the LPAs have been considered throughout the preparation of Lewisham's Local Plan.
- 1.2. To date, Lewisham Council has consulted on:
 - the preferred options of the Local Plan through the Regulation 18 consultation during January and April 2021, and
 - the publication draft of the Local Plan through the Regulation 19 consultation during March and April 2023.
- 1.3. At each stage of the plan making process Lewisham Council has prepared a range of evidence base documents and published them on Lewisham Council's website. These have informed the policies within the new Local Plan. Lewisham Council intends to submit the new Local Plan to the Secretary of State and the Planning Inspectorate in late 2023.

2. Relevant planning authorities

- 2.1. The two relevant LPAs for the purpose of this SoCG are London Borough of Lewisham and London Borough of Bexley.
- 2.2. The two London boroughs are located within south east London (see Map) and, whilst not adjacent to one another, are considered to be neighbouring boroughs for relevant strategic cross-boundary matters.
- 2.3. Lewisham is an Inner London borough and Bexley is an Outer London borough. Both boroughs have river frontage along the Thames. London Borough of Bexley has a recently adopted Local Plan (April 2023).



3. Meeting the duty to cooperate requirement

- 3.1. Lewisham’s new Local Plan seeks to address a number of key strategic matters. For this SoCG, relevant strategic cross-boundary matters are considered in the sections below, identifying where there are specific areas of joint working or cooperation. Where the parties agree to work together, actions are detailed as records of agreement. Where relevant, this SoCG also highlights where agreement on strategic cross-boundary matters has not, as yet, been reached.
- 3.2. Within south east London, Lewisham Council holds regular planning policy officer duty to cooperate meetings with the London Boroughs of Bexley, Bromley, Southwark, and the Royal Borough of Greenwich (referred to as the South East London Duty to Cooperate Group). Lewisham Council chairs these meetings, where borough planning officers provide each other with updates on their plan making progress and discuss relevant strategic cross-boundary matters.
- 3.3. In addition to these regular meetings, both Lewisham Council and London Borough of Bexley will continue to communicate in a collaborative manner and engage with each other through 1-2-1 meetings, ALBPO meetings, informal telephone and email correspondence and statutory consultation exercises.
- 3.4. Duty to cooperate **record of agreement:**
- 3.5. Both parties will continue engaging and working collaboratively through the South East London Duty to Cooperate Group and through other methods of cooperation as set out above.

4. The London Plan

- 4.1. Many of the strategic matters and key issues to be addressed through compliance with the Duty To Cooperate are, in London, a matter for the London Plan; given that this document is the Spatial Development Strategy for Greater London and forms part of each London borough’s Development Plan. However, some strategic matters are cross-boundary and are relevant to the LPAs agreeing this SoCG.
- 4.2. The London boroughs continue to work with the Mayor of London, through the Greater London Authority (GLA) and Transport for London (TfL), on strategic plan-making and infrastructure planning matters. Council officers attend regular Association of London Borough Planning Officers (ALBPO) meetings to discuss strategic matters affecting London.
- 4.3. The London boroughs implement the policies in the London Plan through plan-making and decision taking. Some London Plan policies are of particular relevance to this SoCG, and these are summarised in the strategic cross-boundary matters below.

5. Housing supply

- 5.1 At the regional level, the London boroughs worked collaboratively with the Greater London Authority (GLA) on the preparation of the London-wide Strategic Housing Land Availability Assessment (2017) (SHLAA), key evidence underpinning London Plan housing requirements for each LPA within London. These are set out in Table 4.1 of the London Plan, and which for Lewisham and Bexley are summarised in the following table:

LPA	10-year targets for net housing completions (2019/20 -2028/29)
Lewisham	16,670
Bexley	6,850

- 5.2 The London boroughs are also currently working with the GLA to consider housing delivery on a London-wide basis as part of the next review of the London Plan, through the digital SHLAA project.
- 5.3 Lewisham Council has prepared and published a borough-wide strategic housing market assessment (SHMA) in 2019, with an update in 2022. London Borough of Bexley has prepared and published a borough-wide SHMA in November 2021 as key evidence supporting its local plan.
- 5.4 Lewisham Council has produced a housing trajectory which indicates that the new Local Plan can facilitate the delivery of sufficient additional dwellings to meet Lewisham’s London Plan housing requirement within its boundary over the whole of the plan period. Consequently, Lewisham Council has not declared an unmet housing need.
- 5.5 London Borough of Bexley has demonstrated through its local plan housing trajectory that there are a sufficient number of suitable, deliverable sites that, with an appropriate small sites windfall allowance, can provide the development capacity within the borough to meet Bexley’s London Plan housing requirement over the plan period. Consequently, London Borough of Bexley has not declared an unmet housing need.
- 5.6 Housing **record of agreement:**
- (1) Both parties will continue working towards meeting or exceeding their London Plan housing requirement within the confines of their own borough’s administrative boundary.

6. Designated industrial land

- 6.1 The London Plan states, at paragraph 6.5.3, that “innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews and Opportunity Area Planning Frameworks. This includes collaborative working with other planning authorities in the relevant property market areas.” The London Boroughs of Lewisham and Bexley both have SIL within the Thames Gateway Industrial Property Market Area. Paragraph 6.5.3 further states that “The Thames Gateway provides the greatest scope for strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates.”
- 6.2 Evidence prepared in support of the new Lewisham Local Plan demonstrates that there is a sufficient and proportionate supply of suitable land to meet the anticipated demand for strategic industrial uses during the plan period. Consequently, the Council has not declared an unmet need for strategic industrial locations.
- 6.3 London Borough of Bexley’s recently adopted Local Plan designates enough industrial land to meet its own identified growth in job sectors where location within industrial areas is considered appropriate. The industrial land strategy is set out in policies SP3 and DP7 and Figure 4 of the Local Plan.
- 6.4 Industrial land **record of agreement:**
- (2) Both parties will continue working towards meeting the requirements of Part B of London Plan Policy E5. Both LPAs acknowledge that current identified needs can be met within their own administrative boundaries.

7. Joint waste planning

- 7.1 The London Plan provides the strategic approach that will allow London to achieve net waste self-sufficiency. Policies in the London Plan require the London boroughs to demonstrate that they have made sufficient provision of land and facilities for waste management, with each borough allocated an “apportionment” of household, commercial and industrial waste to manage, which the boroughs are encouraged to collaborate by pooling their apportionment requirements. The London Waste

Planning Forum, which was created when the requirement for a regional technical advisory body (RTAB) for waste management was removed, meets quarterly to discuss strategic matters relating to waste across London and the Wider South East.

- 7.2 Within south east London and stretching into Central London, Lewisham Council works in partnership by pooling its waste apportionment requirements with other London Boroughs in the Southeast London Joint Waste Planning Group (SELJWPG). The SELJWPG is comprised of London Boroughs of Bexley, Bromley, Lewisham, and Southwark, Royal Borough of Greenwich and the City of London. SELJWPG has been formally ratified by each member borough for joint waste planning. London Borough of Bexley is the Chair of the group. The City of Westminster has requested that it be considered to be formally added to the group.
- 7.3 To demonstrate that the boroughs' pooled waste apportionment requirements set out in the London Plan 2021 can be met, the SELJWG produces the Southeast London joint waste planning technical paper. The technical paper is a living draft, which is updated whenever a member borough is preparing a local plan, and provides the evidence that the strategic requirements set out in the London Plan for London boroughs to address in their local plans has been met.
- 7.4 Waste management **record of agreement:**
- (3) Both parties will continue engaging and working collaboratively through the SELJWPG. The parties will do this by: pooling the member boroughs' London Plan waste apportionment requirements; addressing other strategic cross-boundary waste management requirements that will be included in their local plans; and, reviewing and updating the Joint Waste Planning Technical Paper.

8. Green and blue infrastructure

- 8.1 There are several matters that have potential cross boundary impacts and whilst our boroughs do are not adjacent to each other, it is important to consider the following matters in plan making and decision taking.
- 8.2 **Green infrastructure:** The London Plan seeks to enhance strategic networks such as the Green Chain Walk and supporting existing green links across the southeast London area.
- 8.3 **Water infrastructure:** The London Plan sets out in Part D of Policy SI 14 the requirements for Thames Policy Areas (TPAs), including encouragement for boroughs to plan for TPAs through joint Thames strategies.
- 8.4 Green and blue infrastructure **record of agreement:**
- (4) Both parties will work in partnership on consult with each other on proposals that could have adversely affect the London Green Chain Walk.

9. Governance agreements and signatories

- 9.1 SoCG need to be prepared and then maintained on an ongoing basis; and be made publicly available to allow transparency. This SoCG is a live document, to be reviewed and updated regularly so that it reflects the most up-to-date position in terms of joint working, especially:
- Whenever agreements on outstanding matters have been reached and where progress in addressing strategic cross boundary matters is achieved, or
 - At each subsequent key stage of the plan making process, as it progresses towards adoption.

10. Signatories

10.1 The signatories below confirm that this is an accurate record of the strategic matters requiring cooperation between the two London Boroughs. When signing this SoCG:

- The Planning Policy Manager (or equivalent) is the lead Officer responsible for managing the SoCG
- The Head/ Director of Planning (or equivalent) is responsible for signing off the SoCG

Organisation	Name	Position	Signature	Date
London Borough of Lewisham	Nick Fenwick	Director of Planning		2 November 2023
London Borough of Bexley	Seb Salom	Head of Strategic Planning		26 October 2023