

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

Submission Stage (Regulation 22)

August 2023

1 Introduction

- 1.1 This is a Statement of Common Ground (SoCG) that sets out details of the joint working and cooperation that has taken place, and the future cooperation that is required, between the two London Boroughs 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 Lewisham Council forms part of a group of five South-East London Boroughs, as identified in Map 1.
- 2.2 However, the two relevant parties for the purpose of this SoCG are London Borough of Lewisham and London Borough of Bromley.



Map 1: Map showing Lewisham and Bromley

3 The London Plan

- 3.1 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 forms the Spatial Development Strategy for Greater London but is also part of the “development plan” for London Boroughs.
- 3.2 London Boroughs continue to work with the Greater London Authority (GLA) and Transport for London (TfL) on strategic plan-making and infrastructure planning matters. Council officers attend regular ALBPO meetings to discuss strategic matters affecting London.
- 3.3 Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires London Boroughs to request conformity with the London Plan under section 24(4)(a) of the Act on the day they comply with regulation 19(a). Lewisham Council sent a request to the GLA on 1st March 2023 and are currently working with the GLA on matters of conformity.
- 3.4 London Boroughs are working to implement the policies in the London Plan. Some of the London Plan policies are of particular relevance to this SoCG, and these are summarised in the key strategic matters below.

4 Key Strategic Matters

- 4.1 Lewisham’s new Local Plan seeks to address a number of key strategic matters. Each strategic matter is considered in turn and identifies where there are specific areas of joint working or cooperation. The parties agree to work together through several actions, which are detailed as records of agreement. Where relevant, this SoCG also highlights where agreement on key strategic matters have not, as yet, been reached.
- 4.2 At the sub-regional level, Lewisham Council and Bromley Council are members of the South-East London Duty to Cooperate Group (SELDTG), alongside Southwark Council, Bexley Council, and the Royal Borough of Greenwich. Lewisham Council currently chairs the SELDTG meeting. They are held regularly (usually quarterly) to provide each other with updates on the plan making process and to discuss cross boundary matters of strategic importance.
- 4.3 In addition to the SELDTG, both parties 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.
- 4.4 **SELDTG record of agreement:**
 - A1) Both parties will continue engaging and working collaboratively through the South-East London Duty to Cooperate Group, continuing to consider strategic matters such as housing, Gypsy and Travellers, economy, design and heritage, infrastructure, and waste management.**
 - A2) Both parties will share the results of evidence base studies with each other in a timely manner and where appropriate collaborate by preparing joint studies.**

5 Housing

- 5.1 At the regional level, London Boroughs have worked collaboratively with the GLA through the London-wide Strategic Land Availability Assessment (2017) (SHLAA) and the Strategic Housing Market Assessment (2017) (SHMA). These informed each borough’s housing requirement that is set out in Table 4.1 of the London Plan, as summarised in the table below.

LPA	10-year targets for net housing completions (2019/20 -2028/29)
Lewisham	16,670
Bromley	7,740

- 5.2 London Boroughs are 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 To support the preparation of boroughs' current adopted Local Plans, Cobweb Consultants prepared a joint SHMA (2014) on behalf of the SELDTC. This assessed the housing and affordable housing needs for South-East London and demonstrated that collectively the SELDTC boroughs could meet their housing needs within their administrative boundaries. Lewisham Council has since prepared and published a Borough-wide SHMA in 2019, with an update in 2022.
- 5.4 Lewisham Council has also produced a housing trajectory which indicates that throughout its lifetime, the new Local Plan can facilitate the delivery of sufficient additional dwellings to meet its London Plan housing requirement within its boundary. Consequently, Lewisham Council has not declared an unmet housing need.
- 5.5 Lewisham Council has not been approached by Bromley Council to assist with meeting unmet housing need.
- 5.6 **Housing record of agreement:**
- B1) Both parties will continue working towards meeting their London Plan housing requirement within the confines of their own borough's administrative boundary, without requesting assistance from neighbouring authorities to accommodate unmet need.**

6 Gypsy, Travellers, and Travelling Show People

- 6.1 At the regional level, the London Plan requires that ten-year pitch targets are identified within local plans. London Boroughs are currently working with the GLA to determine the need for Gypsy and Traveller pitches on a London-wide basis.
- 6.2 To support the preparation of the new Lewisham Local Plan, a Gypsy and Traveller Accommodation Assessment was prepared and published in 2015; and updated in 2018. The study identifies a need for six pitches within the Borough of Lewisham. Pool Court had been identified as Lewisham's preferred site and has been incorporated into the new Local Plan as a site allocation. This will allow Lewisham Council to facilitate meeting local need within the Borough.
- 6.3 Lewisham Council has not been approached by Bromley Council to assist with meeting unmet Gypsy and Traveller housing need.
- 6.4 **Gypsy, Travellers and Travelling Show People record of agreement:**
- C1) Both parties will continue working towards meeting their current housing need for Gypsies and Travellers within the confines of their own borough's administrative boundary, without requesting assistance from neighbouring authorities to accommodate unmet need.**

7 Economy

- 7.1 At the regional level, the London Plan has implemented a hierarchy of designated employment sites across London (Strategic Industrial Locations and Locally Significant Industrial Sites). The London Plan seeks to protect the sites of strategic importance that contribute to London's economy by requiring local plans to define the detailed boundaries and develop local policies to protect the function of these designated employment sites.
- 7.2 The London Plan designates Opportunity Areas across London. These are locations with significant development capacity to accommodate new housing, commercial development, and infrastructure, linked to existing or potential improvements in public transport connectivity and capacity. There are two Opportunity Areas located within the borough boundary:
- New Cross/ Lewisham/ Catford is located within Lewisham and lies adjacent to the Southwark boundary,
 - Deptford Creekside/ Greenwich Riverside crosses the Borough boundary and is located within the boroughs of Lewisham and Greenwich.
- 7.3 Additionally, the Bromley Opportunity Area is located beyond Lewisham's borough boundary but within the administrative areas of this SoCG, within the borough of Bromley.

- 7.4 In order to tackle spatial concentrations of deprivation across London, the London Plan designates Strategic Areas of Regeneration whereby co-ordinated neighbourhood-based action and investment brings together regeneration, development, and transport proposals with improvements in learning skills, health, safety, access, employment, environment, and housing.
- 7.5 To support the preparation of the new Local Plan, Lewisham Council has prepared and published the Local Economic Assessment (2018) and the Lewisham Employment Land Study (2019). The latter provides details as to how the Borough's future needs for industrial floorspace will be met. It seeks to facilitate the reconfiguration of the Borough's industrial land portfolio along with the intensification and diversification of uses.
- 7.6 Lewisham Council has prepared and published a number of retail related evidence base studies including Catford Town Centre Masterplan (2020), the New Cross Area Framework and Station Opportunity Study (2019), Lewisham Retail Impact Assessment and Town Centres Trends Study (2021) and Local Centres Background Paper (2022). These have led to the new Local Plan introducing changes to the town centre network, including the consolidation of New Cross and New Cross Gate District Town Centres, the designation of several new Local Centres and the transformation of major sites within Catford Town Centre.
- 7.7 The new Local Plan highlights the potential scope for a new town centre in Bell Green and Lower Sydenham, to support a significant amount of new housing planned for the area.
- 7.8 Bromley Council has raised concerns regarding the co-location of uses on Locally Significant Industrial Sites in the Bell Green and Lower Sydenham area and the impact it could have across the borough boundary and on the wider economic sub-area, for example, negating benefits of agglomeration of industrial activities. The new Local Plan makes clear that any development proposals for co-location on LSIS must be employment-led and ensure the retention of industrial capacity. Lewisham Council will continue to liaise with Bromley Council to provide assurances about the outcomes sought on industrial land management in this area. This includes opportunities for engagement on a forthcoming masterplan for the Bell Green area.
- 7.9 **Economy record of agreement:**
- D1) Both parties will continue working positively to ensure the delivery of key policy objectives relating to employment designations and Opportunity Areas covered by this SoCG.**
- D2) Both parties will seek to ensure the overall quantum of retail being proposed across the Borough does not impact on the competitiveness of Lewisham's centres and vice versa, including through consideration of cross-borough impacts as part of the preparation of Local Plan evidence.**
- D3) Lewisham Council will plan to appropriately develop Bell Green as a new town centre as part of the proposed Opportunity Area, without detriment to surrounding boroughs.**

8 Design and Heritage

- 8.1 At the regional level, tall buildings play a role in addressing needs for housing across the region and the London Plan directs all London Boroughs to set parameters for buildings heights in their local plans. This includes local definitions of tall buildings and the identification of areas where tall buildings may be an appropriate form of development.
- 8.2 The London View Management Framework (LVMF) (2012) identifies strategic views and landmark features that make a significant contribution to the character of London. The London Plan requires that local plans reflect the LVMF and consider the identification and protection of other locally significant views.
- 8.3 To support the preparation of the new Local Plan, Lewisham Council has prepared and published the Lewisham Characterisation Study (2019), Heritage Assessment Background Paper (2022) and the Tall Buildings Study and Addendum (2021/ 2022).

8.4 Design and Heritage record of agreement:

E1) When determining planning applications, both parties will consult with each other on proposals (including those with tall buildings) that could have adverse impacts beyond the borough boundary including on:

- Strategic and local views,
- Designated and non-designated heritage assets,
- Established character of adjacent neighbourhoods.

9 Social Infrastructure

9.1 At the regional level, the London Plan seeks London Boroughs to meet the infrastructure needs of London's diverse communities, informed by a needs assessment of social infrastructure.

9.2 To support the preparation of the new Local Plan, Lewisham Council has prepared and published an Infrastructure Delivery Plan (2022). This sets out and prioritises the necessary infrastructure improvements and investment required to support the planned-for growth contained within the new Local Plan. It has been prepared in partnership with the relevant internal and external infrastructure providers, including the transport authorities (inclusive of TfL and Network Rail), health providers, the education authority, open space and green infrastructure providers, and utilities undertakers.

9.3 Lewisham Council will regularly review the Borough-wide Infrastructure Delivery Plan to ensure that infrastructure planning and delivery is supporting local needs; and that investment is directed and prioritised to the places in need. Infrastructure partners will be provided with opportunities to inform content and prioritisation.

9.4 Social Infrastructure record of agreement:

F1) Both parties will seek to deliver borough wide health, community, education, and leisure facilities to meet local needs, making the most of existing community infrastructure where possible, whilst ensuring adverse impacts on local communities beyond the Borough boundary are prevented or mitigated.

10 Green Infrastructure

10.1 At the regional level, the London Plan seeks to protect and enhance London's network of green and open spaces, including Metropolitan Open Land (MOL) and Sites of Importance for Nature Conservation (SINCs).

10.2 To support the preparation of the new Local Plan, Lewisham Council has prepared and published studies on green infrastructure, including Open Spaces Assessment (2020) and Review (2022) and Sites of Importance for Nature Conservation Report (2016).

10.3 The Open Space Assessment (2020) assessed the condition of parks and open spaces across the borough, informing the management, protection and enhancement of open spaces and ensuring that future needs for all types of open space are accounted for and met.

10.4 The Sites of Importance for Nature Conservation Report (2016) provided a robust framework for emerging biodiversity policies in the new Local Plan. A second SINC study for Hither Green and Grove Park (2023) was also prepared and published to support six Biodiversity Action Plan Priority Habitats.

10.5 The new Local Plan recognises connectivity with neighbouring boroughs and encourages walking networks by providing footways, routes and public realm that enable access through development sites and adjoining areas. It also seeks to enhance strategic networks such as the South-East London Green Chain walking route and supporting existing green links across the borough and sub-regionally.

10.6 Green Infrastructure record of agreement:

G1) When determining planning applications, both parties will consult with each other on proposals that could have adverse impacts on green infrastructure, including MOL and SINCs, beyond the Borough boundary.

G2) As part of ongoing plan-making, both parties will consider the potential to improve green grid links including cross boundary routes and green infrastructure.

11 Water Infrastructure

- 11.1 At the regional level, the London Plan recognises the strategic importance of London’s network of linked waterways, seeks to protect water infrastructure including wharves and implements a Thames Policy Area within the vicinity of the River Thames.
- 11.2 The new Local Plan promotes public realm enhancements and new pedestrian links and seeks to maximise the multifunctional social, economic, and environmental functions and benefits of the watercourses.
- 11.3 In partnership with the Environment Agency, Lewisham Council prepared and published the River Corridors Improvement Plan SPD (2015) to provide detailed planning policy guidance for all rivers that flow through the borough including the River Thames, Deptford Creek, River Ravensbourne, Pool River, River Quaggy and Kyd Brook.
- 11.4 **Water Infrastructure record of agreement:**
- H1) When determining planning applications, both parties will consult with each other on proposals that could have adverse impacts on the river network beyond the borough boundary.**

12 Transport Infrastructure

- 12.1 At the regional level, the London Plan requires all development to make the most efficient use of land, reflecting its connectivity and accessibility by existing and future transport, walking, and cycling routes.
- 12.2 To support the preparation of the new Local Plan, Lewisham Council has prepared and published a Transport Strategy and Local Implementation Plan (LIP) (2019). This covers the period from 2019 until 2041 and acts as Lewisham’s main transport strategy.
- 12.3 Lewisham Council has prepared and published an Infrastructure Delivery Plan (2022). This sets out and prioritises the necessary transport infrastructure improvements and investment required to support the planned-for growth contained within the new Local Plan. It has been prepared in partnership with the relevant internal and external infrastructure providers, including the transport authorities inclusive of TfL and Network Rail.
- 12.4 Lewisham Council has prepared and published the A21 Corridor Development Framework (2022). It assesses the development potential of the land alongside this strategic road that runs south from Lewisham town centre down to the borough boundary with Bromley, and beyond.
- 12.5 **Transport Infrastructure record of agreement:**
- I1) Both parties will seek to ensure a coordinated approach to transport movement and the public realm, including on strategic cross borough routes such as the A21 transport corridor.**
- I2) When determining planning applications, both parties will consult with each other on proposals that could have adverse impacts on transport infrastructure beyond the borough boundary.**

13 Waste Management

- 13.1 At the regional level, the London Plan provides the strategic approach that will allow London to achieve net waste self-sufficiency. It requires London Boroughs to demonstrate that they have made sufficient provision of land and facilities for waste management. Each borough is allocated an “apportionment” of household, commercial and industrial waste to manage. An All-London Boroughs Waste Planning Group meets quarterly to discuss strategic matters relating to waste across London.
- 13.2 At the sub-regional level, Lewisham Council pools and manages waste by working in partnership with other London Boroughs in the South-East London Joint Waste Planning Group (SELJWG). To demonstrate effective collaboration, the SELJWG produces the South-East London Joint Waste Technical Paper. The

report provides further details on the pooled apportionment for the boroughs of Lewisham, Southwark, Bromley, Bexley and Greenwich and strategic sites with capacity to manage this over the long-term.

- 13.3 Westminster Council has close connections with the SELJWG as much of their London Plan Waste apportionment is accommodated by Bexley Council, their residual waste is managed at SELCHP in Lewisham and their recyclables are sorted at the Integrated Waste Management Facility in Southwark. For these reasons, Westminster Council has made a commitment to seek to join a waste planning group as part of its most recent local plan examination and they have reiterated this request through their representations to Lewisham's Regulation 19 consultation. The SELJWG will consider this request in due course.
- 13.4 To support the preparation of the new Local Plan, three waste management sites have been safeguarded and are identified as being located within the Strategic Industrial Location at Surrey Canal Road.
- 13.5 **Waste Management record of agreement:**
- J1) Both parties will continue engaging and working collaboratively through the South-East London Joint Waste Planning Group, to identify and address cross-boundary strategic waste management issues and review and update the Joint Waste Technical Paper, as and when needed.**

14 Neighbourhood Planning

- 14.1 At the regional level, an All-London Boroughs Neighbourhood Planning Group provides a network for information sharing and good practice. It is normally chaired and hosted by Camden Council. Lewisham Officers regularly attend these meetings.
- 14.2 Within the administrative boundaries of this SoCG there are:
- Four designated neighbourhood areas/forums, two of which have made neighbourhood plans, within the Borough of Lewisham, and
 - No designated neighbourhood areas/forums within the Borough of Bromley.
- 14.3 The Grove Park neighbourhood area/forum in Lewisham is located close to the borough boundaries with Bromley and Greenwich. This plan is 'made' (brought into force).
- 14.4 **Neighbourhood Planning record of agreement:**
- K1) Both parties will work collaboratively on decisions relating to neighbourhood planning especially where neighbourhood areas and forums span borough boundaries.**

15 Governance agreements

- 15.1 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.

16 Signatories

- 16.1 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 of Service or 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		11/10/2023
London Borough of Bromley	Ben Johnson	Head of Planning Policy and Strategy		30/08/2023