

Lewisham Local Plan: Statement of Common Ground between London Borough of Lewisham and the Royal Borough of Greenwich

Submission Stage (Regulation 22)

October 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 the Royal Borough of Greenwich.



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 All London Borough Planning Officers (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 Greenwich Council are members of the South-East London Duty to Cooperate Group (SELDTG), alongside Bromley Council, Bexley Council and Southwark Council. 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, environment, climate change 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.**
 - A3) Both parties will consult each other on emerging policy and guidance.**

5. Housing

- 5.1. At the regional level, London Boroughs have worked collaboratively with the GLA through the London-wide Strategic Housing 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
Greenwich	28,240

- 5.2 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 To support the preparation of the new Local Plan, Cobweb Consultants prepared a joint SHMA (2014) on behalf of the South-East London Duty to Cooperate Group. This assessed the housing and affordable housing needs for South-East London and demonstrated that collectively the SELDTC 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 Greenwich Council to assist with meeting unmet housing need.
- 5.6 **Housing record of agreement:**
- B1) Both parties will continue working towards meeting or exceeding 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 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 Greenwich 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 Land 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 Greenwich Peninsula, Woolwich, Charlton Riverside, and Thamesmead and Abbey Wood Opportunity Areas are located beyond Lewisham's borough boundary but within the administrative areas of this SoCG, within the Royal Borough of Greenwich.
- 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 **Economy record of agreement:**
- D1) Both parties will continue working positively to maximise the potential for growth within the Opportunity Areas covered by this SoCG.**
- D2) Both parties will ensure the overall quantum of main town centre uses being proposed across the borough does not impact on the competitiveness of Lewisham's centres and vice versa.**

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 The new Local Plan has also been amended in response to GLA recommendations that it include further details around the protection of the Outstanding Universal Value of the Maritime Greenwich World Heritage Site.
- 8.5 Whilst being broadly supportive, Historic England's representations on the Regulation 18 consultation raised concerns about specific site allocation proposals with significant heritage interests, particularly in the Deptford Creekside area. In response to this feedback, Lewisham Council has prepared and published the Heritage Assessment Background Paper (2022).

8.6 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.

E2) Lewisham Council will ensure development in Blackheath (within Lewisham) respects the setting of the Maritime Greenwich World Heritage Site and will consult Greenwich on relevant proposals.

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 deliver borough wide health, community, education, and leisure facilities to meet local needs, making the most of existing community infrastructure where possible, whilst ensuring no additional stress is placed on local communities beyond the borough boundary.

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

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) Both parties will continue working together to improve green grid links including cross boundary walking and cycling networks.

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 To support the preparation of the new Local Plan, Lewisham Council prepared and published the Deptford Creekside Supplementary Planning Document (2012). It seeks to manage change, preserve, and enhance the area's character as defined in the Deptford Creekside Conservation Area Appraisal (2012) by promoting high quality design solutions that respond sensitively to the historic environment.

11.3 The new Local Plan promotes public realm enhancements and new pedestrian links along Deptford Creekside and seeks to maximise the multifunctional social, economic, and environmental functions and benefits of the watercourses.

11.4 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.

11.5 Lewisham Council recognises the need to ensure that the Thames Path joins up with its neighbouring boroughs and to address this the new Local Plan promotes river-front restoration and increased access and permeability through new development sites in the north of the Borough.

11.6 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, including the River Thames and Deptford Creek, beyond the borough boundary.

H2) Both parties will continue working collaboratively to implement policies in relation to the London Plan Thames Policy Area.

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 Transport Infrastructure record of agreement:

I1) 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 within the new Local Plan and are identified as being located within the Strategic Industrial Location at Surrey Canal Road.
- 13.5 **Waste Management record of agreement:**
- K1) 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, two of which have made neighbourhood plans, within the Borough of Lewisham, and
 - Three designated neighbourhood areas, none of which have made neighbourhood plans, within the Royal Borough of Greenwich.
- 14.3 The Grove Park neighbourhood area and forum in Lewisham is located close to the borough boundaries with Bromley and Greenwich. This plan is 'made' (brought into force).
- 14.4 The Lee neighbourhood area and forum spans the borough boundary between Lewisham and Greenwich borough boundaries with Bromley and Greenwich. Both Boroughs have worked collaboratively to support the Lee Neighbourhood Forum in the plan-making process and will continue to do so. This is at plan submission stage.
- 14.5 **Neighbourhood Planning record of agreement:**
- J1) Both parties will continue to work collaboratively on decisions relating to neighbourhood planning especially where neighbourhood areas and forums span borough boundaries.**

15 Governance agreements

- 15.3 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

- 16.3 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
Royal Borough of Greenwich	Victoria Geoghegan	Assistant Director Planning & Building Control		02/11/2023
London Borough of Lewisham	Nick Fenwick	London Borough of Lewisham Director of Planning		02/11/2023