

# **Lewisham Local Plan**

## **Duty to Cooperate Statement**

Report on Lewisham Council's compliance with the Duty to Cooperate on the preparation of the Local Plan – Regulation 19 stage

September 2022

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# 1. Introduction

## Purpose of this Statement

- 1.1 The Duty to Cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities in England to engage constructively, actively and on an ongoing basis with prescribed bodies on the preparation of a local plan. This is particularly to address strategic cross boundary matters.
- 1.2 This report outlines how the London Borough of Lewisham ('Lewisham Council' or 'the council') has prepared the Lewisham Local Plan: Proposed Submission document (Regulation 19) in accordance with the Duty to Cooperate. It sets out how the council has engaged with the prescribed bodies on relevant strategic and cross boundary matters, along with the actions and outcomes that have informed the preparation of the Local Plan.
- 1.3 The Duty to Cooperate Statement will be reviewed and updated as the Local Plan is progressed through the plan process. This will ensure that it reflects ongoing engagement and cooperation prior to the submission of the Local Plan to the Secretary of State, and where necessary, during the plan's examination in public. This may include coverage of new issues or agreements on strategic matters as well as further discussions with prescribed bodies.
- 1.4 The Council has also prepared separate Local Plan Consultation Statements at the Regulation 18 and 19 stages of the plan process respectively. The Consultation Statements detail how the council has undertaken public consultation during the plan-making process and how consultation responses have been used to inform the preparation of the Local Plan. The reports cross-reference this Duty to Cooperate Statement.

# 2. Local Plan review

## Background

- 2.1 Lewisham Council currently has an adopted Local Plan. It comprises the Lewisham Core Strategy (2011), Site Allocations (2013), Development Management (2014) and Lewisham Town Centre Local Plan (2014) documents. The new Local Plan involves a review and update of these plans, which will bring them together into a single document.
- 2.2 The preparation of a local plan involves several key stages. These stages are prescribed by planning legislation. This includes the undertaking of

several rounds of public consultation before a draft local plan can be submitted to the Secretary of State for an examination in public. The examination is overseen by an appointed Planning Inspector. A local plan can only be adopted and brought into force if it passes the examination. This means that the council has satisfied the legal and procedural requirements for preparing the plan (including the Duty to Cooperate) and has also met the ‘tests of soundness’ set out in the National Planning Policy Framework.

**Table 2.1 Key stages in the plan-making process**

<b>Key stage</b>	<b>What is involved?</b>
Regulation 18	Preparation of the local plan including public consultation on the scope of the local plan and the policy proposals
Regulation 19	Publication of the local plan and public consultation on the ‘proposed submission document’
Regulation 22-25	Submission of the local plan and other information to the Secretary of State and Examination in Public
Regulation 26	Adoption of the local plan

### **Early-stage consultation and engagement**

2.3 The council has undertaken numerous formal public consultation and informal engagement exercises during the plan-making process. These have informed the Local Plan: Proposed Submission Document (Regulation 19). In summary, the exercises include:

- **Regulation 18 consultation on the Main Issues (October to November 2015)** – The initial consultation on the scope of the new Local Plan, the Sustainability Appraisal Scoping Report and an Infrastructure Delivery Plan – Framework Document.
- **Regulation 18 consultations on the Gypsy and Travellers Site Local Plan (2016 to 2018)** – Three early stage consultations on a single-issue Local Plan dealing with gypsy and traveller accommodation. This has now been absorbed in the new Local Plan.
- **Engagement on the draft Infrastructure Delivery Plan and other evidence base documents (throughout the Regulation 18 stage)** –

Public consultation and engagement on studies used to inform the preparation Local Plan, including area frameworks and masterplans.

- **Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches document (January to April 2021)** – consultation on the scope and contents of the ‘draft Local Plan’ (including proposed changes to the adopted Policies Map) and supporting documents, including the Interim Integrated Impact Assessment, Habitats Regulations Assessment and draft Infrastructure Delivery Plan.

- 2.4 The council has engaged proactively and constructively with the prescribed Duty to Cooperate bodies and other stakeholders throughout the plan-making process. It has actively sought to secure the necessary cooperation on strategic and cross boundary matters to ensure the Local Plan is effective and deliverable. The council has gone well beyond formal statutory consultation on the Local Plan. It has held ongoing stakeholder meetings, participated in working groups, carried out public consultation and engagement on the preparation of evidence base documents, and worked with statutory consultees on early stage review and input into draft Local Plan policies.
- 2.5 Additional information on the Duty to Cooperate is set out in this report. The Lewisham Local Plan: Regulation 18 Consultation Statement (September 2022) should also be referred for further information on formal public consultation and stakeholder engagement undertaken during the preparation of the Local Plan.

### **3. Legislative and policy context**

#### **Localism Act 2011**

- 3.1 The Localism Act 2011 introduced the Duty to Cooperate by way of amendments to Section 33A of the Planning and Compulsory Purchase Act 2004. This requires that local authorities must cooperate with prescribed bodies to maximise the effectiveness of local plans. They must engage constructively, actively and on an ongoing basis on strategic matters.
- 3.2 For the purposes of the Duty to Cooperate, a strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.

## **Town and Country Planning (Local Planning) (England) Regulations**

- 3.3 The preparation of local plans is governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Regulations set out a list of prescribed bodies that the Duty to Co-operate applies to. Specifically, these are:
- Environment Agency
  - Historic England
  - Natural England
  - Mayor of London (Greater London Authority)
  - Civil Aviation Authority
  - Homes and Communities Agency (now Homes England and Regulator of Social Housing)
  - Each Primary Care Trust established under the National Health Service Act 2006 (Integrated Health Board, which have in Lewisham replaced the Clinical Commissioning Group)
  - National Health Service Commissioning Board
  - Office of Rail Regulation (now Office of Rail and Road)
  - Each integrated transport authority (Transport for London)
  - Each highway authority
  - Marine Management Organisation
  - Each local enterprise partnership

## **National Planning Policy Framework and Planning Practice Guidance**

- 3.4 The National Planning Policy Framework (NPPF) (2021) sets out the Government's planning policies for England and how they should be applied. The NPPF includes policies on plan-making including the Duty to Cooperate. It is accompanied by the National Planning Practice Guidance (NPPG) which provides further information to support the implementation of the national policies.
- 3.5 NPPF paragraphs 24–27 emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 3.6 NPPF paragraph 27 provides that statements of common ground should be prepared and maintained in order to support the plan-making and examination process. These can help to document the cross-boundary matters being addressed by the plan and assist progress in cooperating to address these.

## **4. Demonstrating compliance with the Duty to Cooperate**

- 4.1 This section sets out how details of how the council has fulfilled the Duty to Cooperate up to the current stage of the plan process. It provides an overview of the council's relationships with the prescribed Duty to Cooperate bodies.

### **Relationship with the London Plan**

- 4.2 The Local Plan must be in general conformity with the London Plan, which is produced by the Mayor of London. The London Plan is the spatial development strategy for Greater London and helps to ensure a coordinated approach to planning across all boroughs. The new London Plan was published and came into force 2<sup>nd</sup> March 2021.
- 4.3 Many of the strategic matters to be addressed through the Duty to Cooperate are, in London, a matter for the London Plan or are otherwise addressed through its preparation. This includes the overall amount of housing, provision for employment land and other commercial areas such as town centres, green infrastructure (including open space). It also provides the framework for the delivery of strategic infrastructure (including transport, social infrastructure, waste management, utilities and waterways), whilst recognising further details may be required in boroughs' local plans.
- 4.4 The NPPG addresses the unique circumstances of combined authority areas such as London. It provides that London boroughs must cooperate with each other and other local authority areas outside of London, along with prescribed consultation bodies. The NPPG makes clear that the degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy.<sup>1</sup>
- 4.5 The council has taken a proportionate approach with relevant bodies on identifying and addressing strategic matters through the Duty to Cooperate, focussing on areas where the Local Plan will have significant influence in giving effect to the London Plan.

### ***Cooperation with the Mayor of London and the Greater London Authority group***

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<sup>1</sup> NPPG Paragraph: 033 Reference ID: 61-033-20190315 Revision date: 15 03 2019

4.6 Lewisham council works closely and in partnership with the Mayor of London and the Greater London Authority (GLA) group, which includes Transport for London (TfL). Partnership working is progressed across the council's corporate service areas, including strategic planning and transport.

4.7 The council has liaised regularly with the GLA group throughout preparation of the Local Plan. In addition to statutory public consultations (Regulation 18 stage) the council has engaged with the GLA group in a variety of ways, including: early stage review and officer-level feedback on the draft Local Plan; joint commissioning and work on Local Plan evidence base documents; and feasibility studies on transport infrastructure projects. A short summary of some of the key engagement activities is set out below.

- London Strategic Housing Land Availability Assessment (SHLAA) 2017 - The council worked with the GLA on the preparation of the London SHLAA 2017. This is a key evidence base document informing the London Plan (2021) including the borough-level housing targets. As part of this, the council participated in an extensive site screening and assessment exercise.
- Population projections – The council has liaised with GLA officers on the preparation of bespoke borough population projections, which are used to inform the preparation of the Local Plan and supporting evidence base documents, including the Infrastructure Delivery Plan. The data builds on the London-wide population projections to ensure consistency of approach on strategic planning matters.
- Bakerloo Line Extension – The London Plan identifies the Bakerloo line extension as a strategic infrastructure project. The Local Plan sets out a framework to secure its future delivery. The council has worked closely with the GLA and TfL (along with Network Rail and Southwark Council) to develop the business case for the BLE Phase 1 (serving Old Kent Road, New Cross and Lewisham) and to explore the feasibility of delivering required infrastructure.
- Lewisham Station Interchange – The Mayor of London's Transport Strategy (March 2018) which underpins the London Plan identifies Lewisham station as one of four Strategic Interchanges for the capital. This Local Plan and supporting documents such as the Infrastructure Delivery Plan sets out a framework to secure significant improvements for the station and deliver on this aspiration. The Council is continuing to work in partnership with the GLA, TfL and Network Rail on feasibility studies for the station.
- South Circular (A205) realignment – The regeneration of Catford is a key priority in the Local Plan and will deliver significant levels of housing and additional public benefits. Key to this is the realignment of the South Circular. The Council has worked with the GLA and TfL through the



development of the Catford Town Centre Framework and continues to work in Partnership on the design options for the highway.

- New Cross Area Framework and Station Opportunity Study – This is a key evidence base document informing the Local Plan. It was jointly commissioned by the council, the GLA and TfL. The document sets out a framework for managing growth and regeneration in the New Cross Area supported by new and improved transport infrastructure, particularly the Bakerloo line extension.

- 4.8 The local enterprise partnership for London and Lewisham is the **London Economic Action Partnership (LEAP)**. The council is a member of LEAP through which the Mayor of London and Transport for London engage with London boroughs, business stakeholders to identify strategic issues and plan for economic development in London.

### **Relationship with other bodies**

#### ***Cooperation with neighbouring local authorities***

- 4.9 Lewisham is a member of London Councils, a non-partisan organisation that works on behalf London's 32 borough councils and the City of London Corporation. London Councils acts as a focal point for representing borough interests, informed by the political and professional networks that it runs with the Government, the London Mayor, the wider GLA and London's public service. With respect to planning, London Councils facilitates the **Association of London Borough Planning Officers (ALBPO)**. Lewisham council planning officers regularly attend meetings of the ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group where cross-boundary strategic matters are discussed.
- 4.10 An all London boroughs **Neighbourhood Planning Group** has recently been established. This functions similarly to the ALBPO group and provides a network for information sharing and good practice. It is normally chaired and hosted by Camden council. Lewisham council planning officers regularly attend meetings. Lewisham made a presentation to the group in November 2021 on neighbourhood planning matters in the borough.
- 4.11 At the sub-regional level, Lewisham is a member of the **Southeast London Planning Authorities Group (SELPG)**. The group is comprised of London Boroughs of Lewisham, Bromley, Lewisham, Bexley and Southwark and Royal Borough of Greenwich. The SELPG meets regularly and Lewisham currently chairs the meetings. Duty to Cooperate matters are a standing item on the agendas.
- 4.12 The council is also part of the **Old Kent Road, New Cross and South Bermondsey Growth Partnership**, which consists of Lewisham and Southwark councils, the GLA and TfL. The partnership is focussed on

strategic planning matters for the London Plan Opportunity Areas of Lewisham/Catford/New Cross and Old Kent Road. The partnership helps to ensure coordination and leadership on cross-agency working, planning policy and project delivery. One of the key focus areas is the Bakerloo line extension, which is a significant cross-boundary transport project.

- 4.13 Lewisham is a member of the **Southeast London Joint Waste Planning Group (SELJWPG)**. The SELJWPG was ratified in July 2007 and comprises of London boroughs of Lewisham, Bromley, Bexley and Southwark, Royal Borough of Greenwich and the City of London Corporation. All members are local planning authorities and unitary waste authorities. The group is formed of planning policy and waste planning officers from each of the constituent boroughs.
- 4.14 The SELJWPG works collaboratively to address Duty to Cooperate matters, including the London Plan requirements for waste management. Specifically, the boroughs pool their waste apportionment requirements at a sub-regional level. To support the Local Plan process the SELJWPG prepares a planning technical paper. This is a living document that is subject to periodic review and updating, and used as technical evidence to support the submission and examination of Local Plans. The approach taken has been supported by Planning Inspectors for those local plans already adopted. The group remains committed to joint working and meet as needed to produce each iteration of the technical paper.
- 4.15 Lewisham also participates in the **London Waste Planning Forum (LWPF)**. The LWPF is a forum for local authorities and organisations focussed on planning for waste in London. For the local authorities, this is waste planning under their statutory responsibilities as planning authorities. This is distinct from their separate responsibilities for household waste collection and disposal. Waste planning authorities in London and across the wider Southeast, the Environment Agency, and GLA, London Waste and Recycling Board, London Councils and other London organisations dealing with waste are members. The Forum provides a framework to support and coordinate waste planning in London. The Forum enables authorities to engage and cooperate on strategic waste matters that cross administrative boundaries. The LWPF makes collective responses to policy documents and the members of the Forum agree a consistent approach to waste planning, including the definition of strategic levels of waste movements for statements of common ground.

### ***Cooperation with health and social care bodies***

- 4.16 The council works closely and in partnership with the **NHS Lewisham Integrated Care Board (ICB)**, formerly the Clinical Commissioning Group (CCG), and the **London Healthy Urban Development Unit (HUDU)** across its corporate service areas, including the planning service. Under the Health and Social Care Act 2012, Health and Wellbeing Boards were set up to improve integration between practitioners in local health care, social care, public health and related public services. Further details on strategic matters

for health and social care addressed through the Duty to Cooperate are set out in Section 5.

## 5. Cooperation on strategic matters

- 5.1 This section of the Duty to Cooperate Statement sets out details of the key strategic matters and issues that have been discussed with prescribed bodies and other stakeholders during the preparation of the Local Plan. The section is organised by main policy topic area. Whilst it covers engagement from the start of the plan process, the section focusses on the progression of the Local Plan from the Regulation 18: Main Issues and Preferred Approaches document to the Regulation 19: Proposed Submission document.
- 5.2 **Appendix 1** includes additional details of the council's consultation and engagement with prescribed Duty to Cooperate and other bodies, and should be referred for further information.

### Housing

Key Duty to Cooperate bodies
<p><b>Prescribed</b></p> <ul style="list-style-type: none"> <li>• Greater London Authority</li> <li>• Homes England and Regulator of Social Housing</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Neighbouring London borough Councils</li> <li>• Dartford Borough Council</li> <li>• Sevenoaks District Council</li> <li>• Network Rail</li> </ul>
Areas for cooperation
<ul style="list-style-type: none"> <li>a) Housing need and land availability</li> <li>b) Gypsy and traveller accommodation</li> </ul>

#### a) Housing need and land availability

##### ***Background***

- 5.3 Lewisham is part of the wider London housing market area, which has complex sub markets. The London Plan sets out borough-level housing targets and overall approaches to meeting London's housing needs. Boroughs are directed to set out in their Local Plans how and where new housing should be delivered along with details around mix and tenure.
- 5.4 The London Strategic Housing Land Availability Assessment (SHLAA) 2017 informed the housing targets set out in the London Plan (2021). The study

drew on four sources of capacity: planning approvals; site allocations; potential sites identified through the call for sites, GLA group studies and borough intelligence and; small sites based on annual trends. Lewisham council worked with the GLA on the preparation of the SHLAA, as set out in Section 4 of this report.

- 5.5 The London Plan is also informed by the London Strategic Housing Market Assessment (SHMA) 2017, which provides an assessment of different types of housing need within the region. Lewisham council has prepared additional SHMA studies, in 2019 and 2022 respectively, which provide a more focussed analysis of local area needs. The studies include a calculation of a 'Local Housing Need' figure based on the methodology set out in national planning policy and guidance. The LHN figure is significantly higher than the London Plan housing target for Lewisham.
- 5.6 The Regulation 18 draft Local Plan included both the London Plan housing target and the LHN figure. As the London Plan was still in the examination process and there was uncertainty as to its outcomes, the council considered it appropriate to include the LHN figure in the draft plan.

#### ***Key discussion points and outcomes***

- 5.7 As Lewisham's LHN figure was significantly higher than the London Plan housing target, officers were uncertain as to whether the full extent of the LHN could be met within the borough. Duty to Cooperate discussions with adjoining and neighbouring local authorities (including outside of London) therefore focussed on whether these authority areas were able to accommodate Lewisham's potential unmet housing need. Through meetings and formal representations to the Regulation 18 draft Local Plan, it was established that other authorities were not in a position to accommodate Lewisham's unmet needs. The GLA also objected to the inclusion of the LHN figure in the plan and recommended that the London Plan target be used.
- 5.8 Since the Regulation 18 consultation on the draft Local Plan, the London Plan (2021) has been published and come into force. This provides certainty that the London Plan sets the strategic housing requirement for Lewisham, which the Local Plan must address. Accordingly, references to the LHN figure have been removed from the Regulation 19 plan. The Local Plan has also been amended to reflect that there is a sufficient supply of land available within Lewisham to meet the borough's London Plan housing target in full.
- 5.9 Bromley council has raised concerns about the draft Local Plan proposals for older persons' accommodation. It considers that certain restrictions on this type of use that might lead to an overconcentration and/or displacement of specialist accommodation elsewhere. The Regulation 19 Local Plan has been amended in response, with greater flexibility provided to enable this type of provision to come forward in Lewisham.

- 5.10 Otherwise, the draft Local Plan proposals on housing need are broadly supported by the neighbouring authorities and the GLA, including the approaches on genuinely affordable housing.

### ***Next steps***

- 5.11 The council will continue to monitor housing delivery in the borough and to keep Duty to Cooperate bodies informed with regards to Lewisham's ability to meet the London Plan housing target.

### **b) Gypsy and traveller accommodation**

#### ***Background***

- 5.12 The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life of while respecting the interests of the settled community. The London Plan (2021) requires the Local Plan to include a 10-year pitch target for permanent gypsy and traveller pitches, based on a needs assessment.
- 5.13 To inform the preparation of the Local Plan the council commissioned a Gypsy and Traveller Accommodation Assessment in 2015, which was amended in 2016. The study identifies a need for 6 pitches within the borough. The draft study was subject to consultation with key stakeholders including neighbouring local authorities.

#### ***Key discussion points and outcomes***

- 5.14 The council has liaised with the GLA and neighbouring local authorities to update these bodies on its approach to addressing needs for gypsy and traveller accommodation. This includes changes to the Local Development Scheme which provides that the council will cease production of the single-issue Gypsy and Traveller Site Local Plan, as this will be subsumed into the Local Plan review.
- 5.15 GLA representations on the Regulation 18 draft Local Plan noted that the plan did not include a 10-year pitch target, as required by the London Plan. The GLA also acknowledged that the Local Plan includes a site allocation policy to address the identified need for 6 pitches, but recommended that the policy be amended to address site specific issues around flood risk management and biodiversity. The Regulation 19 Local Plan has been amended to include a 10-year pitch target, informed by the council's up-to-date evidence, along with revisions to the development guidelines for the site allocation.
- 5.16 The council has also been liaising with Network Rail to ensure the deliverability of residential development at the site. Discussions have focussed on matters of land ownership and arrangements to ensure the

continued safe operation of railway infrastructure (for example, to prevent trespassing).

- 5.17 No cross-boundary issues have been raised by neighbouring authorities with regards to pitch provision or unauthorised encampments. Other London boroughs have broadly welcomed Lewisham’s approach to meet its identified needs within the borough.

### ***Next steps***

- 5.18 The council will continue to keep neighbouring boroughs informed with regards to Lewisham’s ability to meet the identified need for gypsy and traveller pitches.
- 5.19 The Council will work with the GLA on the preparation of the London-wide Gypsy and Traveller Needs Assessment.

### **Economy**

<b>Key Duty to Cooperate bodies</b>
<b>Prescribed</b> <ul style="list-style-type: none"><li>• Greater London Authority</li><li>• Local Enterprise Partnership</li></ul>
<b>Other</b> <ul style="list-style-type: none"><li>• Neighbouring London borough Councils</li></ul>
<b>Areas for cooperation</b>
a) Industrial land management b) Town centre network

### ***Background***

- 5.20 The NPPF and London Plan require local plans to set a clear vision and strategy to support economic development and growth. This includes parameters for the use of industrial land to meet local needs and generate inward investment. Lewisham plays an integral role in the London economy as well as in the wider southeast of England.
- 5.21 Lewisham has an established employment land hierarchy with land that is safeguarded for commercial and industrial uses. It comprises London Plan designated Strategic Industrial Locations (SILs) along with different types of locally designated sites, including Locally Significant Industrial Sites (LSIS), Mixed-use Employment Locations (MEL).
- 5.22 The Regulation 18 draft Local Plan sets out the strategic approach to industrial land management in Lewisham. It provides details as to how the Borough’s future needs for industrial capacity and space will be met. Informed by the Lewisham Employment Land Study, the Local Plan seeks to facilitate

the reconfiguration of the Borough's industrial land portfolio along with the intensification and diversification of uses within it.

### ***Key discussion points and outcomes***

#### **a) Industrial land management**

- 5.23 The Regulation 18 draft Local Plan sets out approaches for industrial land management. This includes proposals for the consolidation and co-location of industrial and other uses at the Strategic Industrial Land at Surrey Canal Road. Whilst the approach is supported in principle by the London Plan the GLA has raised concerns about the proposals, both through informal officer discussions and formal representations. In particular, the GLA has sought further clarity about how co-location will be facilitated through the plan-led process, including the need for substitute SIL land to be secured within the Borough.
- 5.24 The council has cooperated with Southwark on strategic industrial land management matters around Surrey Canal Road, Old Kent Road and the wider Bermondsey area. The councils jointly prepared the New Bermondsey Dive-Under Study. This is an evidence base document concerning a site ('Bermondsey Dive-Under') which was formerly required for railway operations on a temporary basis. The study provides a site masterplan which demonstrates that industrial uses can feasibly be delivered here.
- 5.25 The Regulation 19 Local Plan has been revised in response to feedback from the GLA. It makes clear that the Dive-Under will be re-designated as SIL (forming part of a reconfigured Surrey Canal Road SIL) and allocated for industrial uses. The site will provide the necessary substitute SIL land required to enable the consolidation (co-location) of selected sites at Surrey Canal Road.
- 5.26 Lewisham has also worked closely with Southwark on the Bakerloo line extension, including the BLE Economic Assessment study which explores the economic benefits of this transport infrastructure.
- 5.27 The London Borough of Bromley raised concerns with proposals for the co-location of uses on Locally Significant Industrial Sites in the Bell Green and Lower Sydenham area, near the respective borough boundaries. The concerns relate to the impact that co-location could have on the wider economic sub-area, for example, negating benefits of agglomeration of industrial activities. The Local Plan makes clear that any development proposals for co-location on LSIS must be employment-led and ensure there is no net loss of industrial capacity. Lewisham will continue to liaise with Bromley 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.
- 5.28 The Regulation 18 draft Local Plan seeks a carefully managed approach to storage and warehousing uses, recognising that Borough's principal needs for

employment floorspace are for light industrial and office uses. The GLA has raised concerns about policy restrictions on storage and warehousing. In particular, the GLA feel these could adversely impact on London's Central Activities Zone, for example, in terms of provision of last-mile delivery and other logistics functions. In response to GLA feedback the Regulation 19 Local Plan has been amended to recognise Lewisham's role in supporting the CAZ, and to provide greater support for storage and warehousing uses on Strategic Industrial Land and more flexibility elsewhere.

### ***Next steps***

- 5.29 The council will continue to liaise with relevant Duty to Cooperate bodies on industrial land management, including where necessary relevant area based masterplans and major planning applications.

### **b) Town centre network**

#### ***Background***

- 5.30 Both the NPPF and the London Plan make clear the need for local plans to establish a hierarchy and network of town centres, as well to set out approaches to secure their long term vitality and viability. The London Plan classifies Metropolitan, Major and District town centres. Local Centres are designated by the Local Plan.
- 5.31 Lewisham's town centre network and hierarchy were reviewed as part of the preparation of the new Local Plan. The Regulation 18 draft Local Plan proposed changes to the network, including the consolidation of New Cross and New Cross Gate District Centres and the designation of several new Local Centres. In addition, it also flagged to potential scope for a new town centre in Bell Green and Lower Sydenham to support the significant amount of new housing planned in the local area.

#### ***Key discussion points and outcomes***

- 5.32 The Regulation 18 draft Local Plan seeks to facilitate the transition of Lewisham Major Centre to a Metropolitan Centre. The GLA acknowledges that whilst the current London Plan identifies the potential scope for Lewisham to be designated a Metropolitan Centre, its future status will be considered in a review of the London Plan.
- 5.33 The London Borough of Bromley has raised concerns about the potential new town centre in Bell Green and Lower Sydenham. In particular, there are concerns about the impact on the viability of centres in Bromley especially Bromley Major Centre. Through Duty to Cooperate discussions, Lewisham officers provided assurances that a Retail Impact Assessment would be undertaken to inform the appropriate scope of a centre. The Lewisham Retail Impact Assessment and Town Centre Trends Report was subsequently prepared, and it recommended that a Local Centre was the appropriate scale for a new town centre, so that there would be no adverse impact on other



centres. This recommendation has been taken forward in the Regulation 19 Local Plan.

- 5.34 The Royal Borough of Greenwich has sought assurances about development in Lee Green District Centre, and the need for this to be carefully managed. The Lee Green town centre and edge-of-centre area extends into both of the respective Boroughs. Lewisham has worked with Greenwich to ensure a coordinated approach to development and managed change in the area, including through joint working in carrying out statutory duties to support a cross-borough Neighbourhood Plan for this area. The Regulation 19 Local Plan has also been amended in response to feedback, for example, with updates to development and design guidelines on site allocations.
- 5.35 Additional formal representations from the GLA on the Regulation 18 draft Local Plan focused on the place qualities of town centres in supporting Good Growth. The GLA stressed that the Local Plan needs to focus not only on quantitative aspects (i.e. in terms of meeting identified needs for town centre floorspace) but also the qualitative aspects of centres, such as the mix of land uses and public realm. These areas are broadly covered in Part 3 of the Local Plan.

### ***Next steps***

- 5.36 The council will continue to liaise with relevant Duty to Cooperate bodies on town centre management, including where necessary relevant area based masterplans and major planning applications.

### **Design and character**

<b>Key Duty to Cooperate bodies</b>
<b>Prescribed</b> <ul style="list-style-type: none"><li>• Greater London Authority</li><li>• Historic England</li><li>• Civil Aviation Authority</li></ul>
<b>Other</b> <ul style="list-style-type: none"><li>• Neighbouring London borough Councils</li></ul>
<b>Areas for cooperation</b>
a) Historic environment b) Tall buildings and view management

### **a) Historic environment**

#### ***Background***

- 5.37 The NPPF provides that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment. The London Plan also recognises the importance of the historic environment, and directs that local plans take a character-led approach to managing growth and development.

- 5.38 The Regulation 18 draft Local Plan recognises and seeks to build on the distinctive character and identity of Lewisham's neighbourhoods and communities, including their historic character. The plan is informed by the Lewisham Characterisation Study, Conservation Area Appraisals and other evidence base documents. The draft Local Plan acknowledges the challenge of preserving and enhancing local character in the context of managing growth and meeting needs, such as for new housing.

### ***Key discussion points and outcomes***

- 5.39 During the plan-making process the council has maintained dialogue with the GLA and Greater London Archaeological Advisory Service (GLAAS), the latter of which is part of Historic England's London and Southeast Regional Office. Officers from the GLA and GLAAS have provided comments on draft Local Plan proposals both informally between officers and through formal representations.
- 5.40 Through discussions with GLASS, Lewisham officers have been able to confirm the programme for the review of Archaeological Priority Areas in the Borough and ensure the Local Plan policies on archaeology respond to this. The Local Plan has also been amended in response to GLA recommendations that the Local Plan include further details around the protection of the Outstanding Universal Value of the Maritime Greenwich World Heritage Site.
- 5.41 Historic England representations to the Regulation 18 draft Local Plan were broadly supportive of the character-led approach to managing growth as well as the policies dealing with the historic environment. However there were concerns raised on specific site allocation proposals with significant heritage interests, particularly in the Deptford Creekside area. In response to this feedback, Lewisham's conservation officers have prepared a new technical paper assessing sites using Historic England standing guidance. This paper, which will be published as part of the Examination Library, has informed updates to the development parameters for selected sites that are reflected in the Regulation 19 Local Plan.

### ***Next steps***

- 5.42 The council will publish a Heritage Assessment technical paper on selected site allocation policies.
- 5.43 The council will continue to liaise with GLA and GLAAS on matters concerning the historic environment, including programming and completion of the review of Archaeological Priority Areas.

### **b) Tall buildings and view management**

## ***Background***

- 5.44 The London Plan makes clear that tall buildings will play a role in addressing needs for housing and other land uses across the region. It directs all London boroughs to set parameters for buildings heights in their local plans. This includes the setting of local definitions of tall buildings and the identification of areas where tall buildings may be an appropriate form of development.
- 5.45 The London Plan establishes the London View Management Framework (LVMF). It identifies strategic views and landmark features that make a significant contribution to the character of London. Borough local plans are required to reflect the LVMF and consider the identification and protection of other locally significant views.
- 5.46 The Regulation 18 draft Local Plan includes policies dealing with building heights and view management. These were informed primarily by the Lewisham Characterisation Study and Tall Buildings Study.

## ***Key discussion points and outcomes***

- 5.47 The Regulation 18 draft Local Plan was largely prepared whilst the London Plan was undergoing preparation and examination. The examination resulted in significant changes to the London Plan tall buildings policies. These changes could not be fully reflected in the draft Local Plan owing to programming.
- 5.48 GLA representations on the Regulation 18 draft Local Plan included a number of comments on the building heights policy. The GLA advised that the policy should be amended to align with the revised threshold heights for tall buildings established by the London Plan. The GLA also raised concerns about the approach to identification of locations suitable for tall buildings. It was suggested that the 'sliding scale' approach proposed in the Local Plan would result in confusion over areas where tall buildings may be appropriate, and that a more prescriptive approach should be applied.
- 5.49 Representations were received from other prescribed bodies. Historic England emphasised that the draft Local Plan building heights policy should make stronger references to the consideration of impacts of tall buildings on historic environment. Some adjoining London boroughs also raised concerns with the potential impact of tall buildings in Lewisham on character and views in their respective areas. For example, Tower Hamlets also encouraged that the Local Plan consider impact on character and views from across the River Thames.
- 5.50 Following the Regulation 18 consultation the council held several officer-level meetings with the GLA, including specific meetings on building heights. These discussions were used to set the scope of an additional evidence base study on tall buildings. Furthermore, officers liaised with the GLA to receive informal feedback on draft revisions to the Local Plan building heights policy.

- 5.51 Following the Regulation 18 consultation, the council prepared a Tall Buildings Study Addendum. The study was prepared in response to feedback received from the prescribed Duty to Cooperate bodies and the wider public. The study was published for consultation during spring 2022. Prescribed bodies were invited to comment on the draft findings. The final study was used to inform the Regulation 19 Local Plan, which includes further details around threshold heights for tall buildings and suitability locations.
- 5.52 It is noted that the London Plan includes a policy on aviation. The Council has sought to engage with the Civil Aviation Authority (CAA) to discuss the Local Plan proposals, including building heights where the body may have an interest. However at this time the CAA has not responded to the Council's requests for a Duty to Cooperate meeting.

***Next steps***

- 5.53 The council will continue to liaise with relevant Duty to Cooperate bodies on tall buildings and view management, including where necessary relevant area based masterplans and major planning applications.

**Natural environment**

<b>Key Duty to Cooperate bodies</b>
<p><b>Prescribed</b></p> <ul style="list-style-type: none"> <li>• Greater London Authority</li> <li>• Natural England</li> <li>• Environment Agency</li> <li>• Marine Management Organisation</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Neighbouring London borough Councils</li> <li>• Port of London Authority</li> <li>• Greenspace Information for Greater London (GiGL)</li> <li>• Lewisham Biodiversity Partnership</li> <li>• London Wildlife Trust</li> </ul>
<b>Areas for cooperation</b>
<ul style="list-style-type: none"> <li>a) Green infrastructure</li> <li>b) Water management</li> </ul>

**a) Green infrastructure**

***Background***

- 5.54 The NPPF and the London Plan set the strategic framework for conserving and enhancing the natural environment. They provide a direction for local plans to identify natural assets and provide further details on how these will be planned for and managed in an integrated way. The London Plan recognises

the cross boundary nature of the network of green infrastructure and its linkages across the region through the All London Green Grid (ALGG). The GLA group takes a leadership role in working with stakeholders to support the delivery of the ALGG. This includes London boroughs and other bodies such as Forestry Commission, Natural England, and environmental organisations such as Trees for Cities, London Wildlife Trust and Thames21.

- 5.55 To support the preparation of the Local Plan the council has completed a number of studies on green infrastructure, including assessments of open spaces and sites of importance for nature conservation. These studies have been used to inform proposals for revised land-use designations and development management policies in the plan.

### ***Key discussion points and outcomes***

- 5.56 One of the key points of interest from the public, particularly local community groups, during the preparation of the Local Plan concerns the designation of open spaces and nature conservation sites. The council has undertaken a number of assessments to inform the review of and updates to these designations, both prior to and following the Regulation 18 consultation on the draft Local Plan. To ensure robustness on this work, the council has engaged with Greenspace Information for Greater London (GiGL) and the London Wildlife Trust, stakeholders whose remit covers the wider London region. The council has also consulted the Lewisham Biodiversity Partnership during the plan process.
- 5.57 The council has consulted and engaged with Natural England and Environment Agency from the early stages of the Local Plan including on the Integrated Impact Assessment, which incorporates Strategic Environmental Assessment / Sustainability Appraisal. Representations from the Environment Agency on the Regulation 18 draft Local Plan provided that the plan could be strengthened by aligning more closely with the Environment Act 2021 and its provisions on Biodiversity Net Gain and Local Nature Recovery Networks. The Regulation 19 Local Plan has been amended to address this. Otherwise, Environment Agency feedback has largely focussed on water management issues, which are discussed in further detail in subsection (b) below.
- 5.58 The Natural England response to the Regulation 18 consultation on the draft Local Plan set out that the plan did not pose any likely risk or opportunity to the organisation's statutory function and it therefore did not wish to comment further.

### ***Next steps***

- 5.59 The council will consult with prescribed bodies and other statutory consultees during the next stages of the plan process.
- 5.60 The council will continue to work with the Greater London Authority group, Lewisham Biodiversity Partnership and other stakeholders to support the delivery and management of the ALGG.

## **b) Water management**

### ***Background***

- 5.61 The NPPF sets out the framework to ensure that flood risk management is appropriately addressed through the plan-making and development management process. The London Plan acknowledges the multi-functional benefits of waterways and directs boroughs to plan positively for them through local plans.
- 5.62 The water environment is a defining feature of Lewisham. The Borough fronts onto the River Thames and the river poses a potential risk of flooding, although the adjacent land area benefits from the River Thames Tidal Defences. Lewisham also falls within most of the catchment of the River Ravensbourne and its tributaries, including the Quaggy, the Pool and Kyd Brook, which outfalls into the River Thames at Deptford Creek. The Honor Oak Stream (Chudleigh Ditch), another tributary of the Ravensbourne, also passes through the Borough. Elsewhere there are local areas that are at potential risk from other sources of flooding including through surface water run-off, ground water flooding, surcharge from the sewer network and the blockage of culverts and gullies.

### ***Key discussion points and outcomes***

- 5.63 The council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) to inform the Local Plan, including the spatial strategy and corresponding site allocation policies. A large number of sites that are available for redevelopment fall within Flood Risk Zones. The council has also completed a Strategic Flood Risk Assessment (SFRA) and carried out Flood Risk Sequential and Exception tests, in line with national planning policy and guidance. The council has engaged with Environment Agency and other bodies, including Thames Water Utilities Limited, on the preparation of SFRA with officers of these bodies sitting on the project Steering Group. The council has also previously worked with these bodies on the preparation of its River Corridors Improvement SPD.
- 5.64 The council has made a number of amendments to the Regulation 18 draft Local Plan in response to formal representations made by the statutory consultees. This includes updates to the strategic approaches to managing waterways and flood risk as well as site specific development requirements and guidelines where there are localised flood risk issues, including river based, surface water or sewage flooding.
- 5.65 The council has also amended the Local Plan in response to Duty to Cooperate and stakeholder meetings held with the Marine Management Organisation and Port of London Authority. The changes help to ensure stronger alignment with the key plans and strategies of the respective organisations, and also provide that the updated Ministerial Safeguarding Direction for wharves is appropriately reflected in the plan.

### **Next steps**

- 5.66 The council will continue to liaise with relevant Duty to Cooperate bodies on water and flood risk management, including where necessary relevant area based masterplans and major planning applications.
- 5.67 The council will liaise with Environment Agency on the Sequential and Exception Tests. Environment Agency has confirmed that it will provide support as a critical friend on this evidence, but at this time feedback has not yet been received.

## **Community (social) Infrastructure**

### **Health and social care**

<b>Key Duty to Cooperate bodies</b>
<b>Prescribed</b> <ul style="list-style-type: none"><li>• Greater London Authority</li><li>• NHS and Lewisham Clinical Commissioning Group</li></ul>
<b>Other</b> <ul style="list-style-type: none"><li>• Neighbouring London borough Councils</li></ul>
<b>Areas for cooperation</b>
a) Health infrastructure planning

#### **a) Health infrastructure planning**

### **Background**

- 5.68 The London Plan directs boroughs to work with Clinical Commissioning Groups (CCGs) and other health organisations to identify and plan for health care needs and facilities in their area. The London Plan refers to four broad types of health infrastructure: primary care, community healthcare, acute provision, and specialist provision.
- 5.69 Health and care services in the Borough are provided through a network of local GP practices, Lewisham & Greenwich NHS Trust (LGT) (acute and community services from health centres), South London & Maudsley NHS Foundation Trust (mental health services). Specialist hospital services are provided through Guy's & St Thomas' NHS Foundation Trust and King's College NHS Foundation Trust.
- 5.70 As set out in Section 4 of this report, the council works in partnership with health care bodies across its corporate service areas, including with the London Healthy Urban Development Unit (HUDU) and Lewisham Integrated Care Board (ICB), formerly the Lewisham CCG. To inform the preparation of the Local Plan, the council has maintained regular liaison with these bodies, particularly on updating the Infrastructure Delivery Plan. This has helped to ensure that work on the estates strategy for primary and community

healthcare facilities are reflected in the IDP, with further site specific provisions included in the Local Plan.

***Key discussion points and outcomes***

- 5.71 The health care bodies have sought clarification around the projected levels of growth in Lewisham and the spatial distribution of this throughout the Borough. This information is vital to informing the NHS estate management strategy and service improvement strategies. The council has engaged proactively with the Lewisham ICB and London HUDU to provide the latest position on population growth and the emerging spatial strategy, both prior to and following the Regulation 18 consultation on the draft Local Plan. Feedback from the bodies has been used to inform the IDP.
- 5.72 The NHS representations on the Regulation 18 draft Local Plan were broadly supportive of the plan's renewed emphasis on health and well-being. The need for Health Impact Assessments (HIA) to inform the development management process was flagged. The Regulation 19 Local Plan has been amended to include a new requirement on HIAs for certain types of development. A further request was made for the HUDU Planning Obligations Model to be used as a basis for negotiating planning contributions. This will be addressed in a future update to the council's Planning Obligations guidance.
- 5.73 NHS Property Services made Call for Sites submissions through the early stages of the plan-making process. Several of these sites have been included in the Local Plan. These will provide for the appropriate re-provision and improvement of health care facilities in new mixed-use schemes, linked to the NHS estate strategy. An additional site was submitted during the Call for Sites as part of the Regulation 18 consultation on the draft Local Plan. The council has decided not to take forward any of the site submissions received at that stage. However, there will still be an opportunity for new and improved health care facilities to come forward through the development management process.

***Next steps***

- 5.74 The council will continue to liaise with the relevant Duty to Cooperate bodies on population and household growth within the borough, and to collaborate on the periodic review and updates of the IDP.
- 5.75 The council will continue to liaise with relevant Duty to Cooperate bodies on planning applications, including those involving the public sector estate, as well as future updates to guidance documents, such as the Planning Obligations SPD.



## Education Infrastructure

<b>Key Duty to Cooperate bodies</b>
<b>Prescribed</b> <ul style="list-style-type: none"><li>• Greater London Authority</li></ul>
<b>Other</b> <ul style="list-style-type: none"><li>• Neighbouring London borough Councils</li></ul>
<b>Areas for cooperation</b>
a) Education infrastructure planning

### ***Background***

- 5.76 Local authorities in England have a statutory duty to provide sufficient school places for pupils of statutory school age within their local authority area. The London Plan directs boroughs to identify and address local needs and any shortages in supply both locally and sub-regionally, and to identify sites for future provision, particularly in areas with significant planned growth.

### ***Key discussion points and outcomes***

- 5.77 The council has prepared an Infrastructure Delivery Plan (IDP) which includes consideration of needs within the borough for childcare and education facilities. The IDP draws on the latest available information on demand for childcare and school place including future forecasting, along with the council's school place planning strategy. Forecasting is informed by Greater London Authority population projections. The IDP broadly shows that the future demands can be met within the borough, whilst recognising some infrastructure requirements will be needed to support this need for different types of provision.
- 5.78 Lewisham like other London boroughs is working to address the requirements of children and young people under 25 years old with special education needs and disabilities (SEND). Demand for specialist school places in the borough is expected to increase over the short to medium term, which may lead to a need for placements outside the borough if no additional capacity is provided. Requirements for this type of provision are often complex owing to the need for provision to be catered to the specific needs of children and young people.
- 5.79 At Duty to Cooperate meetings officers have acknowledged the complexities of school place planning in London. This is both in terms of modelling for future demand and also recognising that children and young people in Lewisham attend schools in other neighbouring boroughs and vice versa.

### ***Next steps***

- 5.80 The council will continue to monitor school place provision in the borough and share outcomes of its childcare and school place planning research and strategies with neighbouring London borough councils.

- 5.81 The council will continue to liaise with the Greater London Authority to inform the forecasting of demand for school places, including the use of GLA population projections where appropriate.

### Sports and recreation

Key Duty to Cooperate bodies
<p><b>Prescribed</b></p> <ul style="list-style-type: none"> <li>• Greater London Authority</li> <li>• Natural England</li> <li>• NHS and Lewisham Clinical Commissioning Group</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Sport England</li> </ul>
Areas for cooperation
<p>a) Sport and recreation infrastructure planning</p>

#### a) Sports and recreation infrastructure planning

##### ***Background***

- 5.82 Sport and recreation facilities are important components of social or community infrastructure. Both the NPPF and the London Plan set requirements for local authorities to assess needs for sports and recreation facilities and plan positively to meet this need.
- 5.83 In 2019, the Council prepared a Playing Pitch Strategy which included an up to date assessment of supply and demand for playing pitches across the borough. The Strategy was prepared through engagement with Sport England. Building on this evidence base, the Council is now preparing a Physical Activity and Healthy Lifestyles Strategy, which will seek to provide a comprehensive strategy for the future management of sports and recreation facilities in Lewisham.
- 5.84 The Lewisham Open Spaces Assessment (2019) undertook an audit of formal play provision in the Borough by looking at the various types of existing provision suited to different age groups. The study concluded that whilst there is satisfactory provision across the Borough there are deficiencies present in some areas, most notably to the south-east of Catford.

##### ***Key discussion points and outcomes***

- 5.85 Sport England submitted representations to Regulation 18 consultation on the draft Local Plan. The representations included objections to policy proposals concerning development affecting existing sports and recreation facilities, which Sport England considered to be contrary to the London Plan. There were particular concerns around the potential loss of facilities and related social infrastructure.

- 5.86 A Duty to Cooperate meeting was held subsequent to the Regulation 18 consultation. The meeting provided an opportunity for Sport England to discuss their concerns in greater detail and for officers to consider how these could be addressed. In response, a new standalone policy on sport was drafted. This was circulated to Sport England for review, who were broadly supportive of the revised policy approaches. The Regulation 19 Local Plan has been amended taking into account this ongoing feedback from Sport England.
- 5.87 Whilst Sport England were engaged in the preparation of the Playing Pitch Strategy, it has noted that a Stage 3 meeting on the Strategy is outstanding. The meeting is important to ensure the Strategy is sufficiently up-to-date.

**Next steps**

- 5.88 The Council will continue to engage with Sport England on its key plans and strategies, as appropriate, including the Local Plan.
- 5.89 The Council will organise and facilitate a Stage 3 meeting on the Playing Pitch Strategy, including Sport England and other relevant stakeholders.

**Transport and movement**

<b>Key Duty to Cooperate bodies</b>
<p><b>Prescribed</b></p> <ul style="list-style-type: none"> <li>• Greater London Authority / Transport for London</li> <li>• National Highways</li> <li>• Office of Rail and Road</li> <li>• Marine Management Organisation</li> <li>• Civil Aviation Authority</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Network Rail</li> <li>• Port of London Authority</li> </ul>
<b>Areas for cooperation</b>
<p>a) Strategic transport network</p>

**a) Strategic transport network**

**Background**

- 5.90 The London Plan sets out the strategic framework for the provision of transport infrastructure necessary to support London’s growth in a sustainable way. In general, it advocates for rebalancing the transport system towards walking, cycling and public transport. This will require sustained investment in public realm together with new and improved public transport services to ensure that alternatives to the car are accessible, affordable and appealing. The London Plan is supported by the London Mayor’s Transport Strategy.

- 5.91 Despite Lewisham's inner-London location not all of its areas are well-connected or benefit from good access to public transport. The northern and central neighbourhoods are generally better connected to the rest of London with access to the Overground, Docklands Light Rail (DLR) and mainline trains. Public transport access is comparatively poorer in parts of Deptford and neighbourhoods in the south east. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. There is no direct access to the Underground in Lewisham. There are opportunities to make better use of Lewisham's waterway network for transport and the borough includes a safeguarded wharf.
- 5.92 The London Plan commits to the delivery of the Bakerloo line extension, which will take it along Old Kent Road to New Cross Gate and beyond. This presents a significant opportunity to both enable and support growth in the borough. The London Plan also identifies Lewisham station as a key strategic interchange in London and a focus for future improvements.

***Key discussion points and outcomes***

- 5.93 The council has worked closely with the Mayor of London and Greater London Authority group, including Transport for London, throughout the early stages of the Local Plan preparation, as set out in Section 4 of this Duty to Cooperate Statement. This has helped to ensure agreement on the key strategic objectives and priorities for transport planning in Lewisham. Furthermore, separate from the plan process, the council has continued to work collaboratively with the GLA group to deliver new and improved transport infrastructure throughout the borough, including through the Council's Local Implementation Plan (LIP), which helps give effect to the London Mayor's Transport Strategy.
- 5.94 The council has also worked closely with London Borough of Southwark together with the GLA group on planning for the Bakerloo line extension, as the BLE Phase 1 will cover both boroughs. This includes early stage feasibility studies, work to support the business case for the BLE (for example, the BLE Economic Assessment report) and supporting public consultation on BLE proposals, both from TfL and the borough's respective Local Plans and other key strategies.
- 5.95 Representations submitted by the GLA on Regulation 18 draft Local Plan broadly reflected support for the plan proposals. In terms of the strategic approach to integrating land-use and transport, the GLA suggested that the plan should be amended to provide more clarity on the Bakerloo line extension, particularly in relation to the spatial strategy. Amendments have therefore been to the Regulation 19 Local Plan to reflect that whilst the plan is not contingent on the BLE, it provides sufficient flexibility to respond to its phased delivery. The plan also continues to promote and enable the delivery of the BLE. It has been revised with clearer policies around measures to safeguard land and sites required necessary for the BLE.

- 5.96 Whilst the GLA provided support for the ‘restraint’ based approach to parking provision proposed in the draft Local Plan, it was considered that the parking policies required strengthening to ensure conformity with the London Plan. The Regulation 19 Local Plan has therefore been amended to fully align with the London Plan parking standards. This will help to support strategic objectives for ‘modal shift’ and provide for more consistency in parking provision across London.
- 5.97 Following the Regulation 18 consultation on the draft Local Plan, Lewisham council officers held meetings stakeholders for the waterway network, including the Marine Management Organisation and Port of London Authority. Following discussions with these bodies, the Local Plan has been amended to better reflect the key plans and strategies for the wider Thames estuary and additional policy requirements and support for water-based transport.

***Next steps***

- 5.98 The Council will continue to engage with relevant Duty to Cooperate bodies on strategic transport planning and delivery of transport infrastructure. This includes joint working with the Mayor of London and Transport for London on the delivery of transport projects in line with the Local Plan and Lewisham’s Local Implementation Plan.

**Waste management**

<b>Key Duty to Cooperate bodies</b>
<p><b>Prescribed</b></p> <ul style="list-style-type: none"> <li>• Greater London Authority</li> <li>• Environment Agency</li> <li>• Neighbouring and other London borough Councils</li> </ul>
<b>Areas for cooperation</b>
a) Waste management

**a) Waste management**

***Background***

- 5.99 The London Plan provides the strategic approach for London to achieve net waste self-sufficiency. It requires boroughs to demonstrate that they have made sufficient provision of land and facilities for waste management. Each borough is allocated an “apportionment” of waste, which represents the quantities of household, commercial and industrial waste they must manage.
- 5.100 The Council has and will continue with the approach to pool and manage the waste apportionment within its sub-region, working in partnership with other local authorities in the South East London Joint Waste Planning Group (SELJWG). Further details on the group are set out in Section 3 above.
- 5.101 In order to demonstrate effective collaboration, the SELJWG produces the South East London Joint Waste Technical Paper. The report provides further

details on the pooled apportionment and strategic sites with capacity to manage this over the long-term. There are 3 waste management sites safeguarded in the LB Lewisham Local Plan, which are located within the Strategic Industrial Location at Surrey Canal Road.

### ***Key discussion points and outcomes***

5.102 The GLA and Environment Agency representations on the Regulation 18 draft Local Plan acknowledged the approach to waste management and the safeguarding of selected sites within Lewisham. They also signposted that there are additional sites with EA permits for waste management in Lewisham which should be recognised and safeguarded in the plan, in accordance with the London Plan. In response to this feedback the Regulation 19 Local Plan has been amended in line with the recommended changes.

### ***Next steps***

5.103 The Joint Waste Technical Paper will be updated, where necessary, to support the Lewisham Local Plan examination. It will also be subject to periodic review and updating over the plan period.

5.104 The Council will continue to jointly work with South East London Joint Waste Planning Group (SELJWG) and London Waste Group to identify and address cross-boundary strategic waste management issues.

5.105 The Council will continue to engage with other local planning authorities within and waste planning authorities, both within and outside London, to inform the preparation of waste strategies and planning policy documents where appropriate.

## **6. Statements of Common Ground**

6.1 Alongside the Duty to Cooperate, the NPPF includes stipulations around the preparation of Statements of Common Ground to support the plan-making process. These statements are a written record of the progress made by strategic plan making authorities on strategic cross-boundary issues as they prepare local plans. They document where effective cooperation is taking place as plans are drawn up and taken through the statutory process to adoption.

6.2 As a result of the ongoing Duty to Cooperate meetings and correspondence detailed in the previous sections and in accordance with paragraph 27 of the NPPF, the Council anticipates producing Statements of Common Ground with selected bodies. Draft Statements of Common Ground have been prepared for discussion with relevant prescribed bodies.

- 6.3 Where Statements of Common Ground are considered finalised and agreed they will be made publicly available as part of the council's Local Plan examination library.

## **7. Next steps**

- 7.1 This Duty to Cooperate Statement has set out how the council has maintained ongoing engagement with prescribed Duty to Cooperate and other bodies during the preparation of Lewisham Local Plan, up to the production of the Regulation 19 Local Plan: Proposed Submission document.
- 7.2 The Duty to Cooperate Statement may be subject to review and updating as the Local Plan is progressed through the next stages of the plan process, in order that it reflects any additional consultation and engagement on key strategic planning matters informing the Local Plan.
- 7.3 Statements of Common Ground will be prepared with prescribed bodies and other stakeholders, where considered necessary by the council, to support the examination of the Local Plan.

## Appendix 1: Consultation and engagement with Duty to Cooperate bodies

Body (DtC group in brackets if relevant)	DtC type	Regulation 18 correspondence sent (Y/N)	Regulation 18 response received (Y/N)	Follow up actions carried out	Specific DTC meeting held for Regulation 18 to 19 policy development
Environment Agency	Prescribed body	Y	Y	17/11/2021 08/03/2021 15/01/2021	Follow up consultation regarding Infrastructure Delivery Plan. No meeting held
Historic England	Prescribed body	Y	Y	11/04/2021 15/01/2021	Follow up consultation regarding Historic Assets. No meeting held
Natural England	Prescribed body	Y	Y	02/12/2021 08/03/2021 15/01/2021	Follow up consultation on Local Plan and any possible strategic concerns. No meeting due to staff resourcing at NE.
Mayor of London / Greater London Authority (GLA)	Prescribed body	Y	Y	11/04/2021 15/01/2021	5 meetings held with GLA between 15/02/2021 – 08/06/2022  15/02/2021 – Progress Catch up 04/03/2021 – Progress meet up 13/09/2022 – Industrial strategy 30/03/2022 – Tall Buildings 08/06/2022 – Tall Buildings
Civil Aviation Authority	Prescribed body	Y	N	14/01/2022 28/10/2021 08/03/2021 15/01/2021	No response to meeting request
Homes England	Prescribed body	Y	N	28/10/2021 08/03/2021 15/01/2021	No response to meeting request



Regulator of Social Housing	Prescribed body	Y	N	28/10/2021 15/01/2021 08/03/2021	No response to meeting request
Lewisham Clinical Commissioning Group	Prescribed body	Y	Y	28/10/2021 08/03/2021 15/01/2021	No response to meeting request
Office of Rail Regulation	Prescribed body	Y	N	28/10/2021 08/03/2021 15/01/2021	No response to meeting request
Transport for London (TfL)	Prescribed body	Y	Y	08/03/2021 15/01/2021	Members of Strategic Planning team have met with TfL stakeholders every 4-6 weeks to discuss Local Plan, South Circular re-alignment, BLE, Lewisham interchange, Bus Garages/Stands etc
Highways England(National Highways)	Prescribed body	Y	N	<b>04/02/2022</b> 17/11/2021 28/10/2021 08/03/2021 15/01/2021	<b>04/02/2022</b>
Marine Management Organisation	Prescribed body	Y	N	<b>13/01/2022</b> 17/11/2021 28/10/2021 08/03/2021	<b>13/01/2022</b>
Local Enterprise Partnership for London	Other prescribed body	Y	N	17/11/2021 28/10/2021 08/03/2021 15/01/2021	No response to meeting request
Port of London Authority	Others	Y	Y	<b>16/12/2021</b> 28/10/2021 15/01/2021	<b>16/12/2021</b>
Sport England	Other	Y	Y	<b>21/12/2021</b> 15/01/2021 09/10/2015	<b>21/12/2021</b>
Dartford Borough Council	Other	Y	N	<b>16/03/2021</b> 10/03/2021 15/01/2021	<b>16/03/2021</b>
Sevenoaks District Council	Other	Y	N	10/03/2021 15/01/2021	No response to meeting request

Tandridge District Council	Other	Y	N	10/03/2021	No response to meeting request
South East London Duty to Cooperate Policy Group	neighbouring planning authority	Y	Y	<b>20/10/2021</b>	<b>20/10/2021</b>
Southwark Council	neighbouring planning authority	Y	Y	<b>17/03/2021</b> 15/01/2021	<b>17/03/2021</b>
Greenwich Council	neighbouring planning authority	Y	Y	25/02/2021 15/01/2021	No meeting held due to resource/staffing issues at Greenwich
Bromley Council	neighbouring planning authority	Y	Y	<b>17/03/2021</b> 25/02/2021 15/01/2021	<b>17/03/2021</b>
Tower Hamlets Council	neighbouring planning authority	Y	N	28/10/2021 08/03/2021 15/01/2021	No response to meeting request
Bexley Council	neighbouring planning authority	Y	N	<b>17/03/2021</b> 28/10/2021 25/02/2021 15/01/2021	<b>17/03/2021</b>
Croydon Council	neighbouring planning authority	Y	N	15/01/2021	No response to meeting request
Lambeth Council	neighbouring planning authority	Y	N	15/01/2021	No response to meeting request
Lewisham Biodiversity Partnership	Other	Y	Y	<b>09/05/2022</b> 15/01/2021	<b>09/05/2022</b>
National Grid	Other	Y	Y	<b>28/03/2022</b> 15/01/2021	<b>28/03/2022</b>