

Lewisham Local Plan IIA: Note on reasonable alternatives

Introduction

AECOM is leading on the Integrated Impact Assessment (IIA) process that is being undertaken alongside preparation of the Lewisham Local Plan. A key stage in the IIA process involved publication of the formally required IIA Report alongside the Proposed Submission Lewisham Local Plan under Regulation 19 of the Local Planning Regulations in 2022. The aim of the IIA Report, in accordance with regulatory requirements, was essentially to present an assessment of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”. Also, it is important to note that an Interim IIA Report was published alongside the Draft Lewisham Local Plan under Regulation 18 in 2020, which also presented the information required of the IIA Report.¹

Similar information was presented on reasonable alternatives (RAs) in both the Interim IIA Report (2020) and the IIA Report (2022). In particular, the RAs presented, appraised and consulting upon (‘explored’) in 2023 were identical to those from 2020. However:

- The “outline reasons” for selecting the RAs” (Sections 4 and 5) was fully updated in 2022. To be clear, it was not predetermined that the alternatives would be identical, but this was where the evidence led us.
- The appraisal of the RAs (Section 6) was fully updated in 2022.
- The response of the plan-makers to the appraisal / reasons for supporting the preferred option in light of the appraisal of reasonable alternatives (Section 7) was fully updated in 2022.

Having made these introductory points, the discussion below is structured as follows:

- Defining reasonable alternatives
- Appraising reasonable alternatives
- Selecting the preferred option

Defining reasonable alternatives

Section 4 begins by considering what issues / aspects of the plan should be a focus of work to explore RAs, with the conclusion being that the focus should be on exploring alternative key diagrams (‘growth scenarios’) with a supplementary focus on select thematic policy areas.

Section 5 then goes on to focus on a process to define RA growth scenarios, with the supplementary information on thematic policy alternatives presented in an appendix. Specifically, in 2022 Appendix IV of the Interim IIA Report explored ten sets of thematic policy alternatives, whilst in 2023 Appendix IV explored three sets of RAs.²

Focusing on Section 5 in detail, in both reports (2020 and 2022) it is structured as follows:

- Section 5.1 – introduces a process to define RA growth scenarios
- Section 5.2 – explores strategic factors relating to growth quantum, broad distribution and growth typologies.
- Section 5.3 – introduces work undertaken to explore site options and options for specific sites.
- Section 5.4 – draws upon the preceding two sections to explore options/scenarios for the borough’s sub-areas.
- Section 5.5 – combines the sub-area scenarios to form borough-wide RA growth scenarios.

There is also another key factor to note, which is uncertainty regarding the Bakerloo Line Extension (BLE). The BLE has transformational implications for growth options / scenarios, hence uncertainty was a major complicating factor as part of the process of defining growth scenarios (indeed unprecedented in AECOM’s experience).

¹ Also, an IIA ‘Note’ was submitted to the examination in 2024, exploring options for boosting supply.

² The reasons for this tighter focus was explained in full. In short, for a number of thematic policy issues whilst in 2022 the view was that there were RAs by 2023 the view was that there were not. This decision was taken on the basis of an understanding that “reasonableness” is defined in the context of the plan objectives and on the basis of a reasonable expectation that the appraisal will serve to meaningfully differentiate between the alternatives in terms of ‘significant effects’.

In light of the BLE uncertainty, in both 2022 and 2023 the conclusion reached was that there are three sets of RAs:

- Under a 'no BLE' scenario there are two RA growth scenarios.
- Under a 'BLE phase 1' scenario there are two RA growth scenarios.
- Under a 'BLE phases 1 and 2' scenario there are two RA growth scenarios.

These three sets of growth scenarios (two scenario in each instance) were then appraised alongside one another (i.e. simply as six growth scenarios with a view to effective reporting (brevity etc).

Appraising reasonable alternatives

The appraisal table from the IIA Report (2022) is presented below.

It clearly serves to highlight that there is a case to be made for Scenario 6. However, whilst Scenario 6 performs best in terms of the greatest number of sustainability topics, and is also predicted the most significant effects, it is also shown to perform relatively poorly under three topic headings (Biodiversity, Climate change adaptation, Historic env) and the plan-maker (LBC) might choose to give particular weight to one or more of these three topics in the planning balance, i.e. when deciding which of the scenarios best represents sustainable development on balance. It is important to be clear that the appraisal is undertaken without any assumptions made regarding the degree of importance / weight assigned to each of the topics, nor would it be fair or appropriate to assume that all have equal weight in decision-making.

Table A: Summary of the growth scenarios appraisal (2022)

BLE scenario		No BLE		BLE Phase 1		BLE Phase 2	
Locations for 'above baseline' densities		Scenario 1: -	Scenario 2: Catford	Scenario 3: N' Cross Lewisham	Scenario 4: N' Cross Lewisham Catford	Scenario 5: N' Cross Lewisham A21 Catford LSBG	Scenario 6: N' Cross Lewisham A21 Catford LSBG+
Topic							
Air quality and other pollution		3	4	3	4	2	1★
Biodiversity and green infrastructure		1★	3	2	4	5	6
Climate change adaptation		1★	2	3	4	5	6
Climate change mitigation		5	4	4	3	2	1★
Communities	Accessibility	3	3	3	3	2	1★
	Housing	5	4	4	3	2	★
	Other issues	=	=	=	=	=	=
Economy		5	4	4	3	2	1★
Historic env, heritage, character and culture		1★	3	2	4	5	6
Land and natural resources		=	=	=	=	=	=
Transport		3	4	3	4	2	1★

Selecting the preferred option

It is not within the gift of LBC to decide on the BLE hence the starting point is naturally to plan for a no BLE scenario. Under this scenario, the decision taken was to support growth scenario 1 and reject growth scenario 2. The reasons given in Section 7 of the SA Report were brief, and with hindsight might have been elaborated upon (without wishing to simply repeat the AECOM analysis in Section 6), but from the summary appraisal matrix it is apparent that this decision was justifiable. Also, in practice matters in respect of supporting higher growth in Catford have moved on, such that it is not less clear that this is a genuine option.

However, the Council also wishes to ensure flexibility to respond to any decision made regarding the BLE, and this fed into the statement in Section 7. Whilst the statement doesn't spell out which is preferable out of growth scenario 3 versus 4 and growth scenario 5 versus 6, it does clearly set out support for growth scenario 6.

To conclude, whilst with hindsight Section 7 would have been lengthier so as to set out a more systematic response to the appraisal, essentially setting out a preferred growth scenario under all three of the BLE scenarios, this was a challenging and even unprecedented situation, with the plan seeking to straddle two or even three horses.