

# **Lewisham Local Plan: Statement of Common Ground between London Borough of Lewisham and Transport for London (TfL)**

**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 Lewisham Council and TfL throughout the preparation of Lewisham's Local Plan.
- 1.2. To date, Lewisham Council (the 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 the Council has prepared a range of evidence base documents and published them on its website. These have informed the policies within the new Local Plan. The Council intends to submit the new Local Plan to the Secretary of State and the Planning Inspectorate in late 2023.
- 1.4. Council and TfL officers have had ongoing dialogue on planning issues. These discussions have informed development of adopted plans and other related documents. Officers have an ongoing and close relationship and regularly discuss strategic matters affecting Lewisham and the wider Greater London area.
- 1.5. TfL has offered broad support for the new Local Plan through their representations made at Regulation 19 stage. The Council welcomes the recognition that the positive engagement undertaken with TfL during the previous Regulation 18 stage has informed the latest draft of the new Local Plan. Nevertheless, the Council also acknowledges that there may be further components of the new Local Plan that may benefit from modifications. The Council considers that these can be considered through the examination, as necessary.

## **2. Relevant Bodies and Strategic Geography**

### **London Borough of Lewisham**

- 2.1. Sitting in south-east London, Lewisham is an inner London Borough bordered by Boroughs of Bromley, Greenwich, and Southwark.

- 2.2. Despite Lewisham's inner-London location not all its neighbourhoods are well connected or benefit from good access to public transport. The northern, western, and central neighbourhoods are generally better connected to the rest of London with access to the London Overground, Docklands Light Rail (DLR) and mainline rail services. In contrast, some of the neighbourhoods in the southern part of the Borough would benefit from improvements to public transport networks and services and new and improved links to existing provision. It is also noted that currently some neighbourhoods within Deptford, specifically around Convoys Wharf, are also deficient in public transport provision, albeit this is being partially addressed through s106 obligations associated with the planning permission for the Convoys Wharf and other developments in Deptford. These deficiencies in access to public transport have contributed to a relatively high proportion of daily trips being made by car and motorcycle, with consequential impacts on air quality, congestion, and journey times.
- 2.3. There is currently no direct access to the London Underground in the Borough of Lewisham.
- 2.4. There are opportunities to make better use of Lewisham's waterway network for transport. The new Local Plan safeguards the wharf at the Convoys Wharf site for possible river-based passenger transport.



**Transport for London**

- 2.5. TfL is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy and transport policies in the London Plan.
- 2.6. TfL has responsibility for London's network of main roads as part of the Transport for London Road Network (TLRN), the traffic signal SCOOT system, the London Underground, London Overground, Docklands Light Railway, London Trams, the Cable Car, and the Elizabeth line. It does not control National Rail services in London. However, it is responsible for planning and funding London's bus services and infrastructure, the licensing of taxis and private hire, planning and operation of docked cycle hire, Legible London signs, tunnels, Woolwich ferry and the management of eight piers along the River Thames.

### **3. Key Strategic Matters**

- 3.1. Lewisham's new Local Plan seeks to address several key strategic matters. The SoCG considers each transport strategic matter 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 yet been reached.
- 3.2. Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires London Boroughs to request general conformity with the London Plan under section 24(4)(a) of the Act on the day they comply with regulation 19(a). The Council sent a request to the Greater London Authority (the GLA) on 1st March 2023 and are currently working to reach agreement on specific matters of general conformity.
- 3.3. All of the London boroughs work in partnership with TfL and the GLA on strategic plan-making and infrastructure planning matters. Council officers attend regular ALBPO meetings to discuss strategic matters affecting London.

#### **The London Plan**

- 3.4. 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. This is because the London Plan provides the Spatial Development Strategy for Greater London and is also part of the "development plan" for each of the London boroughs.
- 3.5. The London Plan sets out the strategic framework for the provision of transport infrastructure and services 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 and reducing car use through car parking restraint in new developments and policy support for active and sustainable travel. This will require sustained investment in active travel and the public realm together with new and improved public transport services and infrastructure to ensure that alternatives to the car are accessible, affordable, and appealing.

#### **Mayor's Transport Strategy and the Healthy Streets Approach**

- 3.6. The London Plan functions in parallel with the London Mayor's Transport Strategy and London boroughs are required to work with TfL to support their implementation. Local plan policies and site allocations should be developed in general conformity with the London Plan policies and the objectives set out in the Mayor's Transport Strategy.
- 3.7. Additionally, plan-making should consider and support the Healthy Streets Approach (reducing car dependency and increasing active, efficient, and sustainable travel), Vision Zero (the elimination of all deaths and serious injuries on London's transport system) and the Mayor's targets for mode share with the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car.

#### **Opportunity Areas**

- 3.8. 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 Opportunity Area is located entirely within the Borough but adjoins neighbouring Southwark,
  - Deptford Creekside/Greenwich Riverside Opportunity Area extends across the Borough boundary and is part located within both Lewisham and Greenwich.
- 3.9. There are a further seven Opportunity Areas located beyond the Borough boundary. These are considered significant for Lewisham in the South East London context. The Opportunity Areas are:
- Old Kent Road Opportunity Area, which is located within the Borough of Southwark but borders Lewisham,
  - Bromley Opportunity Area, which is located within the Borough of Bromley,
  - Greenwich Peninsula Opportunity Area, Woolwich Opportunity Area, Charlton Riverside Opportunity Area, and part of Thamesmead and Abbey Wood Opportunity Areas, which are located within the Royal Borough of Greenwich's boundary,
  - Part of Thamesmead and Abbey Wood Opportunity Area and Bexley Riverside Opportunity Area, which are located within Bexley's Borough boundary.

## 4. Transport and connectivity

- 4.1. The Council has worked closely with the Mayor of London, the GLA and TfL throughout the early stages of the Local Plan preparation. This has helped to ensure agreement on the key strategic objectives and priorities for transport planning in Lewisham.
- 4.2. The Council has worked with the GLA and TfL to deliver new and improved transport infrastructure throughout the Borough, including through the Council's Local Implementation Plan (LIP), which supports the London Mayor's Transport Strategy.
- 4.3. The Council maintains an Infrastructure Delivery Plan (the most recent published in 2022) which 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.
- 4.4. TfL broadly supports the transport policies within the new Local Plan as outlined within the representations made by TfL at regulation 18 and 19 stages. The Council acknowledges TfL's recommendations for modifications which will be considered prior to submission. The Council has provided an initial response to TfL's regulation 19 representation which outlines potential modifications to address outstanding points of difference and will be included as part of the examination submission.

### **Bakerloo Line Extension**

- 4.5. The London Plan commits to the delivery of the Bakerloo Line Extension, which will extend it from Elephant & Castle, along Old Kent Road, through New Cross Gate and on to Lewisham in Phase 1. 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.
- 4.6. Phase 1 of the Bakerloo Line Extension will provide improvements to the rail infrastructure and services within Lewisham and Southwark. The two Councils have worked together closely with

the GLA and TfL to plan the route. This includes early-stage feasibility studies and supporting the proposed scheme business case. The two Councils have also contributed towards the preparation and publication of the Bakerloo Line Extension Economic Assessment Report (2020) and provided support to several public consultations. There is formal safeguarding in place for the extension, including in the borough for planned stations at New Cross Gate and Lewisham and the running tunnels.

- 4.7. Following the local plan public consultation at Regulation 18, the Council determined to amend the submission draft of the new Local Plan in response to TfL's specific comments on the Bakerloo Line Extension. These changes address the possibility of the Bakerloo Line Extension being delayed and not implemented during the new plan period. The text clearly sets out that delay (beyond the plan period) is not a "preferred" outcome but has been considered as a potential scenario to illustrate the numerous benefits of delivering the Bakerloo Line Extension on time.
- 4.8. As part of the Regulation 19 consultation on the draft local plan, TfL requested several additional modifications to Policy TR1 Sustainable transport and TR2 Bakerloo line extension which would clarify the policy and ensure consistency with the safeguarding directions and the present status of the project. Modifications were also requested to other policies and site allocations where they relate to the Bakerloo line extension.

#### **South Circular (A205 realignment)**

- 4.9. TfL and the Council have been working together to support an ambition to transform Catford Town Centre. The ambition is to improve transport in the area, create a much improved consolidated and people focused public realm at the heart of the revitalised town centre and ensure Catford is an enjoyable place for people to live, work and visit. In particular, to help people to make more journeys on foot, by bike and by public transport.
- 4.10. The proposal is to improve the South Circular Road (A205) which is a part of the Transport for London Road Network (TLRN) by realigning it to the south of Laurence House. This will improve pedestrian accessibility, contribute towards the regeneration of Catford and will deliver additional public realm benefits. 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 realignment of the highway.

#### **A21 Development Corridor**

- 4.11. The Council has prepared and published the A21 Corridor Development Framework (2022), which provides guidance to potential developers and decision-takers. It assesses the development potential of the land alongside this strategic road that runs south from Lewisham town centre down to the Borough boundary with Bromley, and beyond.
- 4.12. The Council consulted TfL during the preparation of the Development Framework and worked collaboratively to identify their existing and potential infrastructure projects along the A21.

#### **Parking**

- 4.13. TfL are broadly supportive of the parking policies in the new Local Plan. However, they have identified several areas where the wording could be strengthened to ensure that the approach to car-free development is a positive one and consistent with the London Plan and to clarify the term 'car-lite' alongside measures to increase use of active and sustainable modes of transport in the Borough. The Council welcome TfL's support and is committed to encouraging car free development and promoting active and sustainable travel infrastructure and services in the

Borough. The Council will continue to work with TfL in relation to on- and off-street parking provision and management, with the objective of encouraging the shift towards increased use of active and sustainable transport and reduced car use in line with Mayoral targets.

#### 4.14. Transport and connectivity record of agreement:

- **Both parties remain committed to working constructively with transport infrastructure and service delivery partners to secure the necessary investment and improvements required to support planned-for growth within the Borough of Lewisham.**
- **Both parties will continue working positively and in cooperation with the GLA to support the business case and secure the delivery of the Bakerloo Line Extension to Lewisham (Phase 1) and, subject to further work and public consultation, eventually to Hayes (Phase 2).**
- **Both parties agree that applicants with proposals in the vicinity of the proposed Bakerloo line extension will be expected to engage with TfL through pre-application discussions to ensure there are no impacts that may preclude, prejudice or delay the delivery of the scheme.**
- **In line with statutory requirements the Council will consult TfL on any planning applications that are within the Bakerloo line extension Safeguarded Corridor in line with the Safeguarding Directions as issued by the Secretary of State for Transport.**
- **Both parties agree that the Council will consult with TfL as a statutory or as relevant other consultee on planning applications which may impact on the transport infrastructure or services to ensure there are no adverse impacts on the public transport network, TLRN, SRN or strategic walking and cycle provision.**
- **Both parties will work collaboratively to minimise harmful impacts that result from the construction of the Bakerloo Line Extension and other transport improvements.**
- **Both parties will work together to optimise development potential, whilst ensuring a coordinated approach to transport movement and the public realm, along the A21 transport corridor.**
- **The Council agrees to consider modifications to the plan in response to TfL's recommendations, which may be necessary to provide further clarity to the intended application of Policy TR4 (Parking) to be in general conformity with the London Plan.**
- **Both parties will continue to work collaboratively in delivering the South Circular realignment.**
- **Both parties will continue working together to improve walking and cycling provision, including along the River Thames and Deptford Creekside.**

## 5. Economy

- 5.1. At the regional level, the London Plan has introduced a hierarchy of designated employment sites across London (Strategic Industrial Land and Locally Significant Industrial Sites). The London Plan seeks to protect 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.

- 5.2. 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.
- 5.3. The Council is also a member 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 helps to ensure coordination and leadership on cross-agency working, planning policy and project delivery across a shared geographic area. One of the partnership's key focus areas is the delivery of the Bakerloo Line Extension, which is a significant cross-boundary transport project.
- 5.4. The Council has also worked closely with Southwark Council on the Bakerloo Line Extension. An example of being the shared input on the Bakerloo Line Extension Economic Assessment Study (2020) which explores the economic benefits of this transport infrastructure.
- 5.5. The Council has cooperated with TfL, GLA and Southwark Council on strategic industrial land management matters around Surrey Canal Road, Old Kent Road, and the wider Bermondsey area. The Councils jointly prepared and published the New Bermondsey Dive-Under Study (2019). There has also been collaborative working towards delivery of the London Overground new and improved stations at Surrey Canal and Surrey Quays as well as improvements to infrastructure to enable train frequencies to increase from 16 to 20 trains per hour.
- 5.6. The Council has prepared and published several retail related evidence base studies including the 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 informed the preparation of the new Local Plan. This includes the introduction of 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 Catford Town Centre.
- 5.7. The new Local Plan highlights the potential scope for a new town centre in Bell Green and Lower Sydenham. This could support the significant growth planned for the area. Subject to any future decision on the Bakerloo line extension beyond Lewisham to Hayes and Beckenham Junction, TfL would support a new town centre in this location in principle, as set out in their response to the Regulation 19 consultation. However, TfL would welcome a modification to the site allocation to include specific wording around a stabling and maintenance facility so as to not preclude a future phase of the Bakerloo line extension serving this area.
- 5.8. The New Cross Area Framework and Station Opportunity Study 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.
- 5.9. **Economy record of agreement:**
  - **Both parties will continue working positively to maximise the potential for growth within the Borough's Opportunity Areas.**
  - **Both parties will continue working with the GLA and Southwark Council to implement transformative growth in the Old Kent Road, New Cross, Lewisham and Catford areas, arising from the New Cross Area Framework, the Catford Town Centre Masterplan, and the delivery of the Bakerloo Line Extension.**

- **Both parties will consider adapting transport provision by securing developer funding where necessary, to cater for the intensification of sites at and around Surrey Canal Road Strategic Industrial Location (SIL), and across the Borough boundary at Old Kent Road.**
- **Both parties will continue working with the GLA to implement transformative growth in the Bell Green and Lower Sydenham area, however this should not prejudice the delivery or operation of a future Bakerloo Line Extension to Hayes and Beckenham Junction and the necessary supporting infrastructure.**

## 6. Governance Agreements

6.1. SoCGs 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.

6.2. The new Lewisham Local Plan submission version was subject to public consultation. The purpose of the consultation under Regulation 19 is to identify potential matters of legal compliance and possible issues of soundness. As a key infrastructure partner, TfL provided responses to the consultation process. The Council has considered the comments and whether modifications to the new Local Plan are necessary in order to meet legal compliance and address issues of soundness. The Council will maintain a dialogue with TfL through submission and into the examination process. The dialogue will focus upon the identifying and agreeing the changes and additions that they believe are essential to ensure that the new Local Plan is confirmed sound and in general conformity with the London Plan.



6.3. The Council has provided an initial response to TfL's regulation 19 representation which outlines potential modifications to address outstanding points of difference and will be included as part of the examination submission. The Council agrees to propose any agreed changes to the Inspector as modifications. The Council is agreeable to considering modifications even if they are unnecessary for confirming soundness. Should it be necessary, the Council and TfL will complete a further supplementary SoCG for submission in advance of the examination hearing sessions.

## 7. Signatories

7.1. The signatories below confirm that this is an accurate record of the strategic matters requiring cooperation between the London Borough of Lewisham and TfL. When signing this SoCG:

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



<b>Organisation Name and Position</b>	<b>Signature</b>	<b>Date</b>
London Borough of Lewisham Nick Fenwick Director of Planning		02/11/2023
TfL Spatial Planning Josephine Vos London Plan and Planning Obligations Manager		12/10/2023