

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

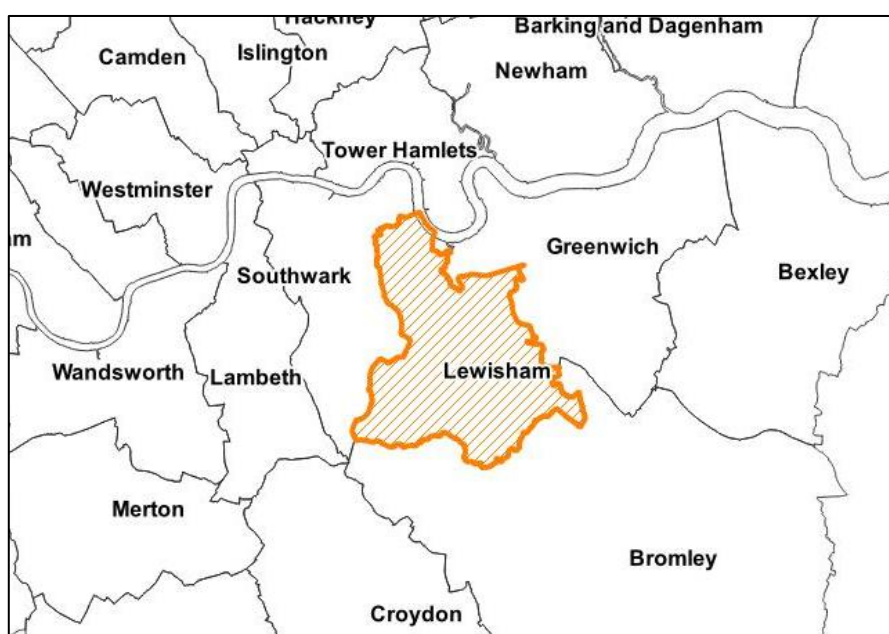
Submission Stage (Regulation 22)

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 the Thames Water throughout the preparation of the Borough's new Local Plan.
- 1.2. To date, Lewisham Council has consulted on:
 - the preferred options of the Local Plan through the Regulation 18 consultation during January and April 2021, and
 - the publication draft of the Local Plan through the Regulation 19 consultation during March and April 2023.
- 1.3. At each stage of the plan making process Lewisham Council has prepared a range of evidence base documents and published them on Lewisham Council's website. These have informed the policies within the new Local Plan. Lewisham Council intends to submit the new Local Plan to the Secretary of State and the Planning Inspectorate in late 2023.

2. Relevant Bodies and Strategic Geography



- 2.1. The two relevant parties for the purpose of this SoCG are Lewisham Council and Thames Water.
- 2.2. Lewisham Council and Thames Water are experienced in partnership working to manage water waste water infrastructure.

Lewisham

- 2.3. Located in South-East London, Lewisham is an inner London Borough. It is bordered by Boroughs of Bromley, Greenwich and Southwark and the River Thames.
- 2.4. Securing a framework to manage the impacts of climate change is a key objective of plan-making. Within this context, the Borough's neighbourhoods and communities must be made more resilient to the possibility of increased water shortages, heat and flood risk.

Thames Water

- 2.5. Thames Water is a water services company responsible for water supply and waste water treatment in Lewisham and the majority of Greater London and the Thames Valley . Thames Water are also helping to deliver the Thames Tideway Tunnel project which will be a new fifteen-mile-long 'super sewer' running under the River Thames.

3. Key Strategic Matters

- 3.1. Lewisham's new Local Plan seeks to address several key strategic matters. Each strategic matter is considered in turn and identifies where there are specific areas of joint working or cooperation. Lewisham Council and the Thames Water (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. Both parties will continue to communicate in a collaborative manner and engage with each other through 1-2-1 meetings, informal telephone and email correspondence and statutory consultation exercises.
- 3.3. Thames Water's representations on the Regulation 19 consultation broadly support the new Local Plan but also make several suggestions to amend the Local Plan. The main points, and the Council's response to them are set out below.
- 3.4. **Record of Agreement:**

A1) Both parties will continue to work together positively to deliver the water supply and waste water infrastructure required for sustainable growth and environmental protection in Lewisham.

4. Water Infrastructure

- 4.1. The water environment is a defining feature of Lewisham. The Borough fronts onto the River Thames, which 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.

- 4.2. The NPPF sets out the framework to ensure that flood risk management is appropriately addressed through the plan-making and development management process.
- 4.3. The Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) to inform the preparation of the new Local Plan, including the spatial strategy and corresponding site allocation policies. It is acknowledged that several 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.
- 4.4. The Council has engaged with Thames Water, Environment Agency, and other bodies, 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.
- 4.5. At the regional level, the London Plan acknowledges the multi-functional benefits of waterways and directs boroughs to plan positively for them through local plans. It also recognises the strategic importance of London's network of linked waterways, seeks to protect water infrastructure including wharves and implements a Thames Policy Area within the vicinity of the River Thames.
- 4.6. To support the preparation of the new Local Plan, Lewisham Council prepared and published the Deptford Creekside Supplementary Planning Document (2012). It seeks to manage change, preserve, and enhance the area's character as defined in the Deptford Creekside Conservation Area Appraisal (2012) by promoting high quality design solutions that respond sensitively to the historic environment.
- 4.7. The new Local Plan promotes public realm enhancements and new pedestrian links along Deptford Creekside and seeks to maximise the multifunctional social, economic, and environmental functions and benefits of the watercourses.
- 4.8. Lewisham Council worked in partnership with the Environment Agency, to prepare and publish the River Corridors Improvement Plan SPD (2015). This provides detailed planning policy guidance for all rivers that flow through the Borough including the River Thames, Deptford Creek, River Ravensbourne, Pool River, River Quaggy and Kyd Brook.
- 4.9. Lewisham Council recognises the need to ensure that the Thames Path joins up with its neighbouring Boroughs and to address this the new Local Plan promotes river-front restoration and increased access and permeability through new development sites in the north of the Borough.

Regulation 18 consultation:

- 4.10. Thames Water positively engaged in the previous Regulation 18 consultation stage, submitting representations relating to the spatial strategy, planning policies, site allocations and designated sites.
- 4.11. In response the Council made several amendments to the new Local Plan. These changes included amendments across the entirety of the new Local Plan to ensure that it refers to Drainage and Wastewater Management Plans; and clarification that connections to trunk sewers should be avoided. The Council noted the comments made by Thames Water in relation to the Earl Pumping Station and clarified that the new Local Plan does not preclude its redevelopment as part of the wider Mixed-use Employment Land designation. The Council noted the references to the Thames Tideway Tunnel and clarified that the new Local Plan includes a policy on wastewater and water supply which supports its delivery. The new Local Plan was also amended to refer the infrastructure projects and clarify that development proposals must ensure no adverse impact on their operation. The Council considers that the consequential amendments made to Regulation

19 version of the new Local Plan were informed by these representations and that Thames Water's concerns have been fully addressed.

- 4.12. The Council noted Thames Water's comments made in respect of flood risk and sustainable drainage. In response, it was noted that the new Local Plan refers to all sources of flooding, and the supporting text specifically refers to sewer flooding. Nevertheless, the Council committed to make further amendments to the new Plan, comprised of additional policy supporting text relating to water drainage, as suggested by Thames Water. The Council sought to respond to Thames Water's comments on proposals involving basement developments and the associated potential risk of sewage flooding. This comprised an amendment to the new Local Plan basement development policy to include additional criteria to secure the installation of a suitable positively pumped device, as suggested by Thames Water. The Council also responded positively to Thames Water's comments relating to water management. In this respect the new Local Plan was amended to include a new standalone policy on water supply and wastewater, to clarify the requirements around this type of infrastructure. Furthermore, the Council considered Thames Water's comments water efficiency and climate change. It was highlighted that the new Local Plan has been amended to refer London Plan standards, which take forward the suggested standards, and allows for the use of planning conditions to secure effective delivery.
- 4.13. As part of their response to the Regulation 18 consultation Thames Water also provided a comprehensive set of comments on the proposed site allocations and other potential development sites, which of were not carried over into the subsequent version of the new Local Plan. Nevertheless, the Council took note and sought to amend the content of the site allocations and planning policies to take full account of Thames Waters representations.

Regulation 19 Consultation:

- 4.14. Thames Water's representations to the Regulation 19 consultation iteratively followed their earlier comments. Their latest representations are broadly supportive of the water infrastructure and management policies in the new Local Plan. However, they have proposed several suggestions to amend the Local Plan, which build upon matters raised during the previous consultation.
- 4.15. The Council notes and welcomes the statement that Thames Water wish to co-operate and maintain a good working relationship with local planning authorities – providing necessary support for the provision of water supply and sewerage/wastewater treatment infrastructure
- 4.16. Thames Water support Local Plan Policy SD8 Sustainable Drainage – subject to further additions to the supporting text. In response, the Council acknowledges that securing appropriate sustainable drainage provision forms a key component towards managing the impact of future growth across the Borough. The Council remains committed to facilitating the necessary partnership relationships that must exist between development industry and infrastructure delivery partners, and the planning authority. To that end, the Council will make amendments to the plan in accordance with the suggested amendment to the new Local Plan Policy SD 08 Sustainable Drainage through the modifications process.
- 4.17. Thames Water support Local Plan Policy SD10 Water Supply and wastewater policies – subject to further additions to the supporting text. The Council notes the comments made in relation to the possible impact of growth on water and wastewater demand across the Borough. Within this context, the comments made in relation to water efficiency are recognised. In conclusion the Council will make an amendment to the wording of the supporting text set out under Paragraph 11.68.
- 4.18. Thames Water have made further detailed comments in relation to the following site allocations:
- **LCA SA 02 Lewisham Shopping Centre**

- LCA SA 03 Land at Engate Street
- LCA SA 05 Land at Conington Road and Lewisham Road (Tesco)
- LCA SA 06 Thurston Road Bus Station
- LCA SA 07 Lewisham Retail Park Loampit Vale
- LCA SA 08 100-114 Loampit Vale
- LCA SA 10 House on the Hill at Slaithwaite Road
- LCA SA 12 Ladywell Play Tower
- LCA SA 14 Driving Test Centre, Nightingale Grove
- LCA SA 15 Land at Nightingale Grove and Maythorne Cottages
- LCA SA 16 Land at Rushey Green and Bradgate Road (Aldi)
- LCA SA 17 Catford Shopping Centre and Milford Towers
- LCA SA 18 Catford Island
- LCA SA 19 Laurence House and Civic Centre
- LCA SA 21 Wickes and Halfords, Catford Road
- LCA SA 22 Ravensbourne Retail Park

4.19. Thames Water's comments do not openly object to these site allocations but seek to ensure that the developers who will be responsible for the delivery of these sites work in positive partnership with them to secure the necessary connectivity to their water infrastructure networks. These comments develop those expressed during the previous Regulation 18 consultation. The Council considers that this matter has been addressed through changes introduced at the Regulation 19 stage. Consequently, the Council is not proposing any further modifications in relation to most of the sites. However, the Council acknowledges that Policies LCA SA 01 and LCA SA 09 will benefit from some relatively minor changes that will ensure meaningful engagement between developers and Thames Water.

4.20. **Water Infrastructure record of agreement:**

- C1) The Council will liaise with Thames Water on the Sequential and Exception Tests and other evidence base documents, as and when they need reviewing.**
- C2) The Council will continue to work with its key stakeholders, including Thames Water and other water companies, on its Infrastructure Delivery Plan.**
- C3) Both parties will share evidence related to water infrastructure, as and when new data arises.**
- C4) Both parties will continue working collaboratively to improve water and waste water infrastructure across the borough and implement policies in relation to the London Plan Thames Policy Area.**



5. Governance agreements

- 5.1. SoCG need to be prepared and then maintained on an ongoing basis; and be made publicly available to allow transparency. This SoCG is a live document, to be reviewed and updated regularly so that it reflects the most up-to-date position in terms of joint working, especially:
- Whenever agreements on outstanding matters have been reached and where progress in addressing strategic cross boundary matters is achieved, or
 - At each subsequent key stage of the plan making process, as it progresses towards adoption.

6. Signatories

6.1. The signatories below confirm that this is an accurate record of the strategic matters requiring cooperation between the two parties. 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.

Organisation	Name	Position	Signature	Date
London Borough of Lewisham	Nick Fenwick	Director of Planning		02/11/2023
Thames Water	David Wilson	Property Town Planner		02/11/2023