



# AGENDA

## MAYOR AND CABINET

**Date: WEDNESDAY, 15 NOVEMBER 2017 at 4.30 pm**

**Committee Room 4  
Civic Suite  
Lewisham Town Hall  
London SE6 4RU**

**Enquiries to: Kevin Flaherty 0208 3149327  
Telephone: 0208 314 9327 (direct line)  
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### MEMBERS

Sir Steve Bullock	Mayor	L
Councillor Alan Smith	Deputy Mayor - Growth & Regeneration	L
Councillor Chris Best	Health, Well-Being & Older People	L
Councillor Kevin Bonavia	Resources	L
Councillor Janet Daby	Community Safety	L
Councillor Joe Dromey	Policy and Performance	L
Councillor Damien Egan	Housing	L
Councillor Paul Maslin	Children & Young People	L
Councillor Joan Millbank	Third Sector and Community	L
Councillor Rachel Onikosi	Public Realm	L

**Members are summoned to attend this meeting**

**Barry Quirk  
Chief Executive  
Lewisham Town Hall  
Catford  
London SE6 4RU  
Date: Thursday, 09 November 2017**



INVESTOR IN PEOPLE

The public are welcome to attend our committee meetings, however occasionally committees may have to consider some business in private. Copies of reports can be made available in additional formats on request.

## ORDER OF BUSINESS – PART 1 AGENDA

Item No		Page No.s
1.	Declaration of Interests	1 - 4
2.	Minutes	5 - 9
3.	Matters Raised by Scrutiny and other Constitutional Bodies	10 - 58
4.	Outstanding Scrutiny Matters	59 - 60
5.	New Homes Programme Update	61 - 78
6.	Low Cost Energy	79 - 94
7.	Gypsy and Traveller Local Plan Update	95 - 299
8.	Update on Fire Safety	300 - 320
9.	Fire safety response to SDSC	321 - 331
10.	Consultation on changes to the subsidy on cooked meals	332 - 357
11.	Response to SSSC Review of Demographic Change	358 - 363
12.	Lewisham Poverty Commission	364 - 414



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- tell the clerk to the meeting before the meeting starts;
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- ensure that you never leave your recording equipment unattended in the meeting room.

If recording causes a disturbance or undermines the proper conduct of the meeting, then the Chair of the meeting may decide to stop the recording. In such circumstances, the decision of the Chair shall be final.

MAYOR & CABINET		
<b>Report Title</b>	Declarations of Interests	
<b>Key Decision</b>	No	Item No. 1
<b>Ward</b>	n/a	
<b>Contributors</b>	Chief Executive	
<b>Class</b>	Part 1	Date: November 15 2017

## Declaration of interests

Members are asked to declare any personal interest they have in any item on the agenda.

### 1 Personal interests

There are three types of personal interest referred to in the Council's Member Code of Conduct :-

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests

### 2 Disclosable pecuniary interests are defined by regulation as:-

- (a) Employment, trade, profession or vocation of a relevant person\* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person\* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.

- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person\* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:-
  - (a) that body to the member’s knowledge has a place of business or land in the borough; and
  - (b) either
    - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
    - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person\* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

\*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

### **(3) Other registerable interests**

The Lewisham Member Code of Conduct requires members also to register the following interests:-

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes , or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25

### **(4) Non registerable interests**

Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members’ Interests (for example a matter concerning the closure of a school at which a Member’s child attends).

## **(5) Declaration and Impact of interest on members' participation**

- (a) Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take no part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- (b) Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph (c) below applies.
- (c) Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- (d) If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- (e) Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

## **(6) Sensitive information**

There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

## **(7) Exempt categories**

There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-

- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
- (b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor;
- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception)



# Agenda Item 2

MAYOR AND CABINET		
<b>Report Title</b>	Minutes	
<b>Key Decision</b>		Item No.2
<b>Ward</b>		
<b>Contributors</b>	Chief Executive	
<b>Class</b>	Part 1	Date: November 15 2017

## Recommendation

It is recommended that the minutes of that part of the meeting of the Mayor and Cabinet which were open to the press and public, held on October 25 2017 (copy attached) be confirmed and signed as a correct record.

# MINUTES OF THE MAYOR AND CABINET

Wednesday, 25 October 2017 at 6.00 pm

PRESENT: Councillors Alan Smith, Chris Best, Kevin Bonavia, Joe Dromey, Damien Egan, Joan Millbank and Rachel Onikosi.

ALSO PRESENT: Councillor Maja Hilton and Councillor John Muldoon.

Apologies for absence were received from Sir Steve Bullock and Councillor Janet Daby.

## 70. Declaration of Interests

Councillors Joe Dromey and Joan Millbank both declared personal interests in Item 10 as Lewisham Homes leaseholders.

## 71. Minutes

RESOLVED that the minutes of the meeting held on October 4 2017 be confirmed and signed as a correct record.

## 72. Matters Raised by Scrutiny and other Constitutional Bodies

None were raised.

## 73. Outstanding Scrutiny Matters

The Deputy Mayor observed there had been no slippage since the last report.

RESOLVED that the report be noted.

## 74. Business Rates Revaluation Support

The Head of Law advised the Cabinet that the legal implications and equality provisions were the same as shown in the Public Space Protection Order item and other reports appearing on the agenda.

Officers stated there were currently unable to confirm if the administrative grant attached to the scheme would be enough to cover costs. Officers were able to confirm the provisions relating to betting shops were not open to challenge, as this was a Lewisham Council scheme.

Having considered an officer report and a presentation by the Cabinet Member for Resources, Councillor Kevin Bonavia, the Cabinet, for the reasons set out in the report:

RESOLVED that:

(1) the Business Rates Revaluation Support Scheme (Revaluation Support) be approved in accordance with the Council's powers under section 47 of the Local Government Finance Act 1988;

(2) the scheme be agreed for this financial year only, i.e. from 1 April 2017 to 31 March 2018 and a further report be presented to the Mayor and Cabinet in 2018 detailing the proposed schemes for 2018/19, 2019/20 and 2020/21 once the actual scheme take up and cost is known for 2017/18;

(3) the 2 schemes announced in the March 2017 budget (Support for Pubs and Supporting Small Businesses) be approved pursuant to the Council's powers under section 47 of the Local Government Finance Act 1988; and

(4) the s151 Finance Officer be authorised to implement the three schemes detailed so that the agreed discretionary discounts for business rates can be awarded in compliance with the scheme criteria.

#### **75. No 7 and 8 Gasholders Bell Green**

The Head of Planning reported a late representation had been received from the landowner's agent raising various concerns about the scheme and the potential effect on a pending planning application. In response she advised the Cabinet that a local listing would be a consideration to be taken into account when determining any application but that it did not preclude development or ensure that the gasholders could not be removed.

Annabelle McLaren of the Sydenham Society addressed the Cabinet and said a petition to save the gasholders had attracted 650 signatures. She outlined the historical and architectural significance of the gasholders and urged that they be listed. She was supported by Councillor Chris Best who believed the gasholders to be an important part of the area's social and cultural heritage. Councillor Best acknowledged that local listing would not prevent other opportunities to uplift the locality.

In reply to the debate the Deputy Mayor stated that while the proposals had the backing of the Cabinet, his personal background as an engineer led him to conclude the steps to list a no longer fit for purpose piece of equipment was unnecessary, especially as a similar structure had already been listed on the Old Kent Road.

Having considered an officer report and presentations from the Sydenham Society and by the Deputy Mayor, Councillor Alan Smith, the Cabinet, for the reasons set out in the report:

RESOLVED that the addition of No.7 & 8 Bell Green gasholders to the Local List be approved.

#### **76. Public Space Protection Order**

This item was withdrawn from the agenda without being considered.

#### **77. London Business Rates Pilot**

The Executive Director for Resources and Regeneration confirmed this was intended to be a pilot proposal and could not go ahead until every London borough had agreed to take part.

Having considered an officer report and a presentation by the Cabinet Member for Resources, Councillor Kevin Bonavia, the Cabinet, for the reasons set out in the report:

RESOLVED that the Council be recommended to support the proposal to create a London Business Rates pool based on the principles set out in the London Councils proposals, with a preference for Option D, as set out within paragraph 6.7 (i.e. greater weighting to “needs” and “population” (each 30%) with equal remaining weightings of 20% for “incentives” and “investment” pots, subject to clarification on the details still outstanding, in particular:

- that any London pool will be protected by a no detriment guarantee;
- on the detail of how the 100% devolved business rates plans from government will operate and the timing for their introduction;
- of the impact of the fair funding review and arrangements for conversion from pilots to permanent arrangements (including when and how revaluations will be conducted); and
- that there is unanimous agreement from all London Boroughs on how the pool will operate at set up and enable individual authorities to leave if they wish to.

#### **78. Management Report August 2017**

Having considered an officer report and a presentation by the Cabinet Member for Policy and Performance, Councillor Joe Dromey, the Cabinet:

RESOLVED that the report be noted.

#### **79. Lewisham Homes Business and Delivery Plan 2017-20**

In praising the overall performance of Lewisham Homes, Councillor Millbank also highlighted a couple of concerns raised by her constituents and was assured by a representative of Lewisham Homes that these would be investigated subsequent to the meeting.

Having considered an officer report and a presentation by the Cabinet Member for Housing, Councillor Damien Egan, the Cabinet, for the reasons set out in the report:

RESOLVED that:

- (1) the performance of Lewisham Homes against its targets be noted; and
- (2) the Business and Delivery Plan for 2017-20 be approved.

#### **80. Comments of the Public Accounts Select Committee on adult social care**

Having considered an officer report, and a presentation by the Chair of the

Public Accounts Select Committee, Councillor Maja Hilton, the Cabinet:

RESOLVED that the views of the Select Committee as set out be received and the Executive Director for Community Services be asked to provide a response for Mayoral consideration.

**81. Comments of the Public Accounts Select Committee on communications**

Having considered an officer report, and a presentation by the Chair of the Public Accounts Select Committee, Councillor Maja Hilton, the Cabinet:

RESOLVED that the views of the Select Committee as set out be received and the Executive Director for Resources and Regeneration be asked to provide a response for Mayoral consideration.

**82. Comments of the Public Accounts Select Committee on income generation**

Having considered an officer report, and a presentation by the Chair of the Public Accounts Select Committee, Councillor Maja Hilton, the Cabinet:

RESOLVED that the views of the Select Committee as set out be received and the Executive Director for Resources and Regeneration be asked to provide a response for Mayoral consideration.

The meeting closed at 6.56pm

# Agenda Item 3

MAYOR AND CABINET		
<b>Report Title</b>	Report Back On Matters Raised By The Overview And Scrutiny Business Panel or other Constitutional bodies	
<b>Key Decision</b>	No	Item No.
<b>Ward</b>		
<b>Contributors</b>	Head of Business & Committee	
<b>Class</b>	Open	Date: November 22 2017

## Purpose of Report

To report back on any matters raised by the Overview and Scrutiny Business Panel following their consideration of the decisions made by the Mayor on October 25 2017 or on other matters raised by Select Committees or other Constitutional bodies.

<b>MAYOR AND CABINET</b>			
<b>Report title</b>	Comments of the Overview and Scrutiny Committee on Post Offices		
<b>Contributors</b>	Overview and Scrutiny Committee	<b>Item No.</b>	3
<b>Class</b>	Part 1	<b>Date</b>	15 November 2017

## **1. Summary**

- 1.1 This report informs Mayor and Cabinet of the comments and views of the Overview and Scrutiny Committee, arising from discussions held on Post Offices at its meeting on 31 October 2017.

## **2. Recommendation**

- 2.1 Mayor and Cabinet is recommended to note the views of the Overview and Scrutiny Committee as set out in section three of this referral and receive the Cass Business School report setting out the case for a national Post Bank (attached at Appendix A).

## **3. Overview and Scrutiny Committee views**

- 3.3 At the Committee's meeting on 31 October 2017, local Councillors heard from a representative of the Communication Workers' Union in addition to the Council's Head of Public Services about the potential impact of the proposed closures of the New Cross and Sydenham Crown Post offices. Members noted that non-Crown Post Offices, operating under franchise arrangements, are unable to offer the full range of post office services and that this would have a negative impact on consumers and the local economy.
- 3.4 The Committee also considered the Cass Business School report setting out the case for a national Post Bank (Appendix A). The Committee is of the view that the establishment of a Post Bank would enable the Post Office to be sustainable in the long term, by diversifying its portfolio of activities and increasing revenues. A state-owned Post Bank would also provide better access to finance for Small and Medium Enterprises, improved financial inclusion, a rebalancing of the UK economy away from London and other major urban centres and align the Post Office with the successful strategy of other postal operators around the world.

## **4. Financial Implications**

- 4.1 There are no financial implications arising out of this report per se.

## **5. Legal Implications**

- 5.1 The Constitution provides for Select Committees to make recommendations to the Executive or appropriate committee and/or Council arising from the outcome of the scrutiny process.

## **6. Further Implications**

- 6.1 At this stage there are no specific environmental, equalities or crime and disorder implications to consider.

### **Background papers**

[Post Office Update](#) – report to the Overview and Scrutiny Committee, 31.10.17

If you have any queries on this report, please contact Charlotte Dale, Overview and Scrutiny Manager (02083148286)





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**CASS**

**BUSINESS SCHOOL**  
CITY, UNIVERSITY OF LONDON

— EST 1894 —

## **Making the Case for a Post Bank**

Report Prepared for the Communications Workers Union

September 2017

**Barbara Casu Lukac**

**Angela Gallo**

**Francesc Rodriguez-Tous**

Centre for Banking Research

Cass Business School

City, University of London

## **CONTENTS**

<b>Executive Summary</b>	<b>Page 4</b>
<b>Introduction</b>	<b>Page 7</b>
<b>PART I. Current situation of the Post Office</b>	<b>Page 9</b>
1. Current performance of the Post Office Ltd	
2. The Partnership with the Bank of Ireland UK	
<b>PART II. The new UK competitive landscape: challenger banks and bank branch closures</b>	<b>Page 20</b>
<b>PART III. A Post Bank model for UK</b>	<b>Page 26</b>
i. A separate subsidiary entity for financial services	
ii. Raising equity capital and the ownership structure	
iii. Size and portfolio composition	
iv. Market analysis	
v. Capitalising on existing strengths	
<b>Final Remarks</b>	<b>Page 46</b>
<b>Biographies</b>	<b>Page 47</b>
<b>Contact details</b>	<b>Page 48</b>

## **EXECUTIVE SUMMARY**

This report sets out the case for a Post Bank in the UK.

The establishment of a Post Bank provides a solution which would enable the Post Office to ensure its long-term sustainability, by diversifying its portfolio of activities and increasing revenues. In addition, a state-owned Post Bank would also enable other important economic and social goals:

- better access to finance for Small and Medium Enterprises (SMEs)
- improved financial inclusion
- a rebalancing of the UK economy away from London and other major urban centres

The establishment of a Post Bank would also align the Post Office with the successful strategy of other postal operators around the world.

Post Office banking services are currently provided by the Bank of Ireland UK (Plc).

### **Background**

Since 2010, the economic and financial landscape in the UK has changed substantially. Our analysis suggests that the Post Office's current partnership with the Bank of Ireland has not delivered the expected and potential results. The revenues the partnership has brought in for the Post Office remain significantly lower than post banks around the world and it has not delivered a full range of banking products for the Post Office's customers.

During a period where many new challenger banks have obtained a banking licence and some, such as Metro Bank, have managed to grow significantly, the Bank of Ireland has decreased its investments in the UK. The Irish lender was severely weakened by the financial crisis and needed state bailouts. To approve state aid, the European Commission imposed conditions which forced the Bank of Ireland to sell non-core activities, including its business banking and corporate banking activities in Great Britain, resulting in a significant gap in the partnership's provision of financial services which includes no business banking services. Another significant weakness is the failure to roll out current accounts on a national basis.

A proposal for the creation of a Post Bank was put forward in 2009 and rejected by the government in 2010, which concluded that the Post Office should continue to build on its existing relationship with the Bank of Ireland (UK) Plc. The arguments behind this rejection were:

1. It would be costly
2. It would require a new set of skills
3. It would introduce increased risk in the Post Office's balance sheet
4. It would be difficult to gain market share in a very competitive market.

Our proposal for a Post Bank addresses each of these concerns.

## Recommendations

**Our recommendation is that the partnership with the Bank of Ireland should be ended,** for two key reasons:

1. Due to the persistent negative legacy from the financial crisis and further current challenges, the Bank of Ireland is unlikely to invest substantially in the partnership in the near future.
2. In more general terms, a partnership model with a large private bank for the provision of postal financial services leaves the Post Office's ambitions for growth dependent on the fortunes of the partner.

**We advise that the Post Office acquires the Bank of Ireland UK portfolio** (or part thereof), thereby retaining all the customers that have acquired products and services white-labelled via Post Office Money. This strategy would alleviate previous concerns that it would be difficult to gain market share in a very competitive market. This would also allow the Post Office to capitalise on existing skills and expertise.

**We recommend that the Post Bank be set up as a subsidiary,** with a separate management team. This would facilitate the newly established entity application for a banking licence to the Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA). It would also help ease the government concern that a Post Bank would introduce risk to the Post Office's balance sheet, as the new entity would be endowed with its own capital.

We estimate that the initial equity should be in the region of £2 billion. This amount of equity would be sufficient, for example, to allow the Post Bank to acquire the Bank of Ireland UK portfolio. While we discuss different alternatives to raise this initial capital, the amount equates to the investment the government has put into the Post Office in the past seven years. We estimate that the profits the Post Bank would generate would eliminate the need for an ongoing annual subsidy for the Post Office and put it on a sustainable footing for the future. Furthermore, the current macroeconomic conditions are ideal to raise the initial capital, due to the low interest rates environment.

### **Opportunities: building on existing strengths**

**A Post Bank is an opportunity to build on the Post Office's significant existing strengths.**

The report identifies market opportunities for a Post Bank, particularly in SME lending. Several policy institutions in the UK have expressed concerns about a lack of competition in this market segment, which results in restricted access to finance for small and medium size firms.

This sector is characterised by barriers to entry such as a need for an extensive branch network and the offering of a broad range of financial products. Notably, while these represent barriers for traditional credit institutions, and even more so for newcomers, they would not be barriers for a Post Bank, as it could leverage on its large branch network very efficiently and on the current offer of a broad range of financial products through its partnerships and joint ventures.

Additionally, the Post Bank could join forces with those challenger banks that specialise in SME lending, in order to take full advantage of this opportunity, acquire new technology and make sure that lending and related risks are managed prudently and in a sustainable way. **We**

**posit that there is room for a Post Bank as a new player aiming to gain market share in this sector—thus benefiting the whole economy.**

In this strategy, the Post Bank will also capitalise on other existing strengths of the Post Office which include the **very positive public perception of the Post Office brand** compared to financial institutions. A strong brand and a solid reputation are key factors for a successful new player in any financial system, but these usually take years to build – the Post Office already has this significant advantage.

Finally, the capillary structure of the Post Office branch network puts the new Post Bank in a strong position to support financial inclusion by addressing the large pockets of people and small firms which are currently unbanked or face the consequences of the branch closure programmes operated by banks.

## Introduction

This report sets out the case for a Post Bank in the UK. We will argue that a Post Bank is a viable business opportunity that will enable the government to achieve several objectives.

Firstly, it will contribute to the revenues of the Post Office, thereby ensuring its long-term sustainability and ending its reliance on government subsidies. Secondly, a Post Bank will also increase competition in the banking sector and offer a wider choice to consumers and a much-needed alternative source of funding to small businesses, thus contributing to the country's economic growth. Building upon the strong Post Office brand, a unique, capillary branch network, and free from the legacy of the financial crisis that still affects traditional banks, a Post Bank can be a modern, sophisticated and innovative player offering a range of banking services at a large scale.

The idea of a Post Bank is neither new nor exclusive to the UK. Declining revenues from postal services and mail business are a common experience for Post Offices around the world and the need to diversify revenue has become a necessity for them in most countries. A Post Bank is an established and successful player with a long history of collecting deposits and offering postal savings services to the public in many countries. They are often set up following major restructuring of the traditional Postal Service.

In Germany, the independent Deutsche Postbank was established in 1990, following the split of the Deutsche Bundespost into the three companies: Post, Telekom, and Postbank. Japan Post Bank (Yū-cho) was established in 2006, again following a restructuring of the sector. Along similar lines, the establishment of the BancoPosta in Italy in 1999 was part of the restructuring of Poste Italiane. Several examples from other countries show that a Post Bank can be a sophisticated, innovative and profitable player in the financial services industry, capitalising on core strengths (such as brand and branch network) and contributing to economic growth while delivering returns to shareholders.

The idea of a British Post Bank is also not new: In 2009, the Post Bank Coalition—a group comprised of the Federation of Small Businesses, Countryside Alliance, the New Economics Foundation, Unite, CWU and others—presented a case for a Post Bank in the UK. The group campaigned for a state-owned bank to be established in the Post Office. However, they were unsuccessful. In 2010, the Department of Business Innovation & Skills (BIS) recognised that a Post Bank was, in principle, a good idea, but they raised the following concerns:

1. Capitalising a new bank would be time consuming and expensive
2. It would require the development of a new set of skills
3. It would create a much more volatile and risky balance sheet
4. It would necessitate building a significant market share very quickly in a competitive market.

BIS (2010)<sup>1</sup> concluded that:

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<sup>1</sup> <https://www.gov.uk/government/publications/securing-the-post-office-network-in-the-digital-age>.

*“Post Office Ltd should build on its relationship with the Bank of Ireland. The Bank of Ireland is committed to making a success of its tie-up with the Post Office and has major plans to expand in Britain.”*

As we set out below, this expansion has not happened. Furthermore, since then, market circumstances have changed significantly, and have resulted in a more favourable environment for the establishment of a Post Bank. In this report, we will argue that the establishment of a Post Bank is not only a viable business opportunity, but also a means by which to increase competition in parts of the banking sector that have high barriers to entry. We will point out and discuss the reasons why the partnership with the Bank of Ireland is not delivering the expected and potential results and we will propose and evaluate alternative strategies. In doing so, we will provide counter-arguments to the concerns raised above.

To present the case for the establishment of a Post Bank, **Part I** of this report evaluates the current performance of Post Office Ltd and of **Post Office Money** (the financial services brand operated by Post Office Ltd). **Part II** discusses the relevant changes in the financial services sector since the previous Post Bank proposal. The objective is to emphasise that most of the assumptions, which led to the government decision to prioritise the partnership model with the Bank of Ireland are no longer relevant. **Part III** of this report will provide a detailed proposal for the establishment of a profitable Post Bank, by highlighting market opportunities and more importantly, by emphasising how the Post Office can leverage its current strengths.

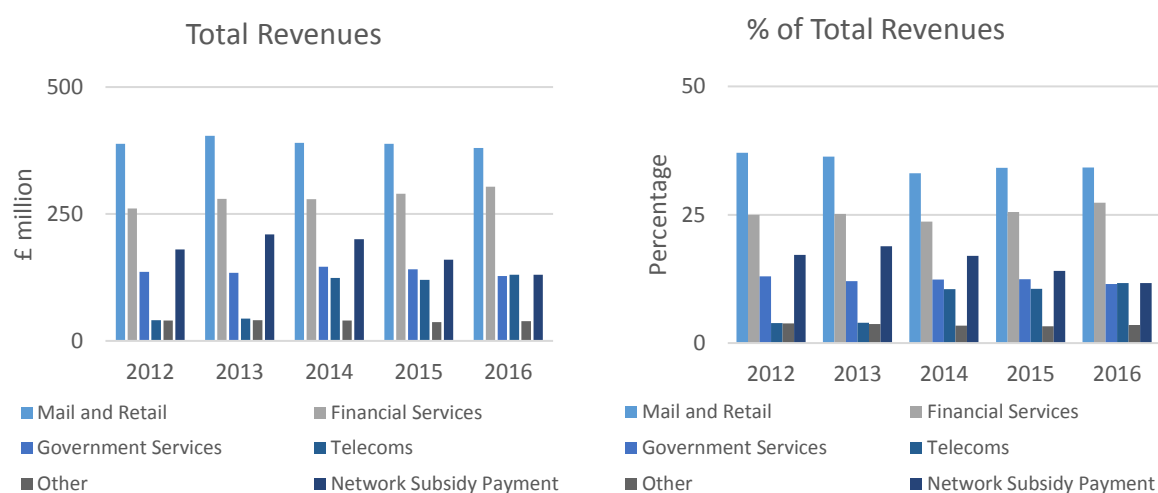


## Part I. Current situation of the Post Office

### 1. Current performance of Post Office Ltd

The current performance of the Post Office Ltd highlights the need for revenue diversification. In 2016, the Post Office revenues decreased by £43 million (-3.6%) to £1,136 million (Figure 1). This includes the decrease of £40 million in the Network Subsidy Payment from the government, which is expected to continue decreasing in the following years. Moreover, the operating loss in 2016 was £24 million, despite a series of cost-saving measures implemented since 2012, when the operating loss was £119 million.

**Figure 1. Post Office Revenues from Financial Services**



Source: *Post Office Ltd Annual Reports, various years.*

One part of the business where revenues increased is across Financial Services, in aggregate, operated via Post Office Money. This trend is in line with income diversification generated by Postal Operators (or Posts) around the world, as financial services revenues are increasingly used to diversify the sources of income and offset the decline in the traditional postal business. In industrialised countries, revenue from financial services (as share of total revenues) has increased from 10.8% in 2005 to 16.6% in 2015 (Box 1).

#### **BOX 1: Current Trends in Postal Financial Services around the world**

Despite their key role in a country's economy, postal operators around the world are currently facing financial difficulties. The main reasons why several postal operators have been operating at a loss—or have seen their profits decline dramatically—include **the strong decline in traditional mail revenues** (for both domestic and international services), which has not been fully compensated by the increase in parcel revenues. Another reason is that **the postal sector has been liberalised in many countries**, and hence those postal services that used to have a monopoly position now face domestic and international competition.

**With increased competition and declining revenues, diversification into other services has become a necessity for the viability of Post Offices in many countries.**

These trends have led Post Offices to diversify their business into financial services to generate profits or at least to compensate losses from traditional business. Across industrialised countries, the share of income from postal financial services increased from

10.8% in 2005 to 16.6% in 2015. This share of income is even higher for European countries, reaching 22.8% in 2015.

#### INDUSTRIALISED COUNTRIES

- Share of income from postal financial services in 2005: 10.8%
- Share of income from postal financial services in 2015: 16.6%

#### EUROPE

- Share of income from postal financial services in 2005: 19.2%
- Share of income from postal financial services in 2015: 22.8%

#### ITALY

In 2015, **Poste Italiane** operating profit was €880m, of which:

- Operating loss of €568m in the core postal business
- Operating profit of €930m in the financial services unit
- Operating profit of €487m in the insurance unit

#### NEW ZEALAND

In 2015, **New Zealand Post Office** operating profit was NZD143mn – of which:

- Operating loss of NZD3m for mail and logistics services
- Operating profits of NZD132m from financial services

#### SWITZERLAND

**PostFinance** represents 56% of the Group's operating profits

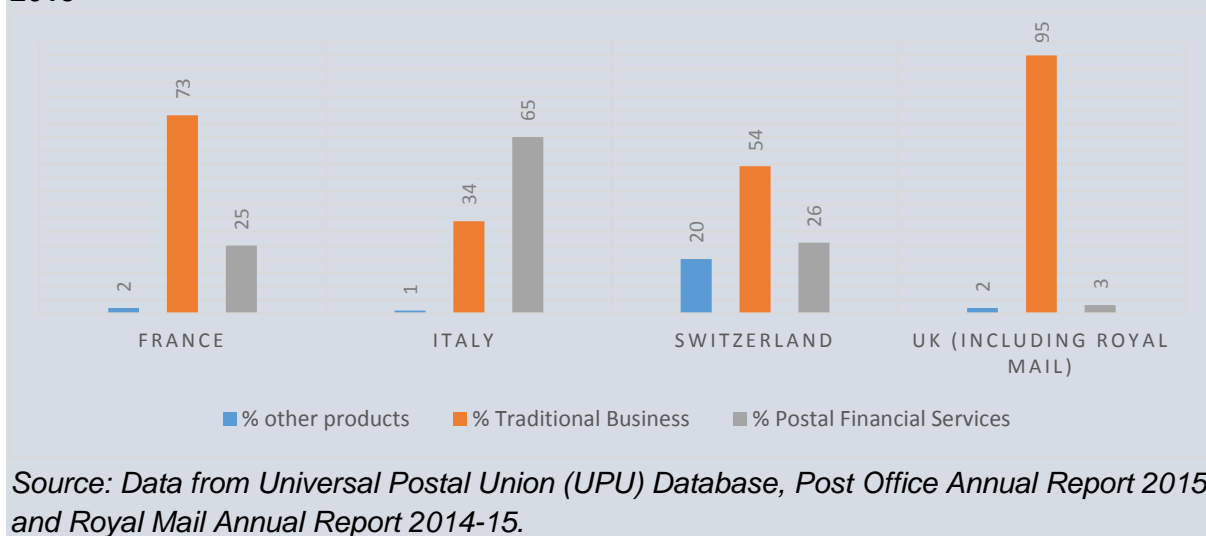
#### FRANCE

**La Banque Postale** represents about 25% of Poste Group's overall operating profit, roughly the same the parcels business.

Figure 1.1 presents a comparison in terms of income composition for France, Italy and Switzerland, where the national Post has expanded strongly in the financial services provisions via the establishment of a Post Bank. UK data are sourced from the Post Office and Royal Mail annual reports; this allows us to compare the financial revenues with the revenues from the whole postal business as it is the case for the other countries.

**Adding the 2015 revenues for Royal Mail UKPIL — Royal Mail's core UK business (£7,757m) — to the Post Office revenues would see the percentage of income from postal services in the UK to account for just above 3%.**

**Figure 1.1. Percentage of income from postal financial services (selected countries) in 2015**



Source: Data from Universal Postal Union (UPU) Database, Post Office Annual Report 2015, and Royal Mail Annual Report 2014-15.

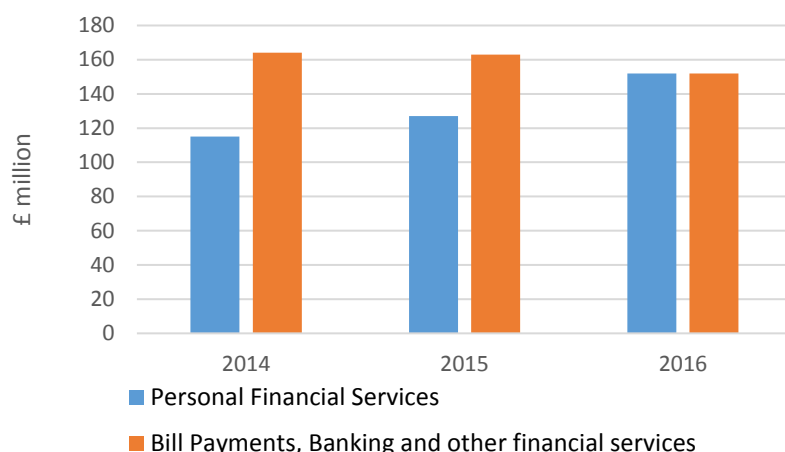
**Post Office Money** is a financial services brand operated by Post Office Ltd, which provides credit cards, insurance products, mortgages and personal loans to customers in the United Kingdom through **Post Office** branches, the internet and telephone.

For the Post Office Ltd, Financial Services revenues are allocated between *Personal Financial Services* and *Traditional Financial Services* products:

1. *Personal Financial Services* include savings commissions (ISAs and online savings), insurance and new mortgage products.
2. *Traditional Financial Services* include bill payment services, business banking services and Postal Orders.

Revenues from *Personal Financial Services* have increased recently, driven by a strong growth in savings commissions (particularly ISAs and online savings), insurance and new mortgage products. However, revenues from *Traditional Financial Services* products have declined. Much of this decline is commonly attributed to the increased use of online banking services and decrease in bill payment services and Postal Order. However, it is also driven by the fact that business-banking services are no longer offered by the Bank of Ireland UK (the current partner of the Post Office for the provision of banking services). In fact, taking into account the lack of revenues from business banking, traditional financial services have remained remarkably profitable.

**Figure 2. Post Office Revenues from Financial Services**



Source: Post Office Ltd Annual Reports, various years

**Table 1** shows the Post Office's current business model for the provision of financial services, under the umbrella of Post Office Money, for each of the three types of financial services offered: i) banking services; ii) insurance services; iii) currency services.

- i) For the provision of banking services, the Post Office launched a joint venture with the Bank of Ireland (Midasgrange Ltd) in 2004. In 2012, the Bank of Ireland bought out the Post Office's share of this joint venture for £3m and moved to a contractual relationship between the two organisations that runs until 2023. Under the new agreement, which is referred to as an *exclusive partnership*, the Bank of Ireland is responsible for product development and delivery while the Post Office has the primary responsibility for product sales and marketing and ensuring all customer interactions meet the Post Office's brand values. In addition, the Post Office also offers a Post Office card account, designed especially for receiving pensions, benefits and tax credit and aimed at people without a bank account. The Post Office card account is offered by J.P. Morgan Europe Ltd.
- ii) In the insurance business, the Post Office has recently completed its first acquisition, buying the joint insurance business from the Bank of Ireland (UK) plc and incorporating it into its subsidiary Post Office Management Services Limited, which operates the business alongside its existing travel insurance activities. From the date of acquisition (September 2015) the insurance business has contributed £15m of financial services revenue and £6m of profit before tax.
- iii) For currency services, the Post Office has a joint venture with the Bank of Ireland, called First Rate Exchange Services Holdings Limited, whose principal activity is the supply of foreign exchange in the UK. The Post Office owns 50% of First Rate Exchange Services Holdings Limited, which generated £35m in dividends in 2015-2016.

For banking services, the reliance on the partnership with the Bank of Ireland is very strong (it is the only partner for almost all banking services), whereas for other financial services Post Office Money acts as a platform for different providers. In the provision of insurance services, the Post Office both offers own products (travel insurance) and sells policies of specialist

providers. Overall, the profits from the foreign currency Joint Venture increased significantly in absolute terms since 2012, but decreased by £1m in 2015/16.

**Table 1. Post Office Money – the current business model**

Banking services	Provider	Insurance services	Provider	Currency services	Provider
Current Accounts	Bank of Ireland	Travel Insurance	Post Office Limited and Post Office Management Services Limited (bought out Bank of Ireland in 2015)	Travel Money	First rate Exchange Services Ltd (Post Office and Bank of Ireland joint venture 50-50)
Credit cards Personal Loans	Bank of Ireland	Home Insurance Motor Insurance	BISL Limited Devitt Insurance Services Limited		
Mortgages Money ISAs	Bank of Ireland One Family	Life Insurance Business Insurance	Royal London Arthur J. Gallagher Insurance Brokers Limited		
Savings	Bank of Ireland	Pet Insurance	Pinnacle Insurance Plc		
Post Office Card Account	J.P. Morgan Europe Ltd.				

In general terms, Post Office Money’s business model follows the *Partnership Model (BM3 – Partnership with a financial services provider)*; see Box 2 for a description of business models. This model has both advantages and disadvantages, as shown in Table 2. One of the main drawbacks of the partnership model in terms of revenue generation is the strong dependence on the partner’s willingness or ability to expand the business. This dependence is even more critical when the partner is a traditional bank facing financial distress, following the legacy of the financial crisis, as is the case with the Post Office’s partnership with the Bank of Ireland. Instead, a Post Bank (*BM4* and *BM5*) has no such dependence.

**Table 2. Partnership model: Advantages and disadvantages**

Advantages	Disadvantages
Easier implementation in terms of changes to the organisation	Products offered may not come with the Post's brand. No say on the quality of products and on the sales strategy.
No significant initial investment required	Limited revenue if only certain functions are performed.
Possibility of partnership with multiple providers	Reliance on the partner for the provision of services (i.e. if the partner is a bank, exposure to the banking industry) and reputational risks.
Easier in terms of regulatory burden	Possible coordination issues with the partner(s)
Lower exposure to financial risks	Limited impact on financial inclusion
Brand capitalisation	Limited training/learning process for staff who fail to acquire the necessary skills

**BOX 2: Different arrangements for the provision of financial services**

By choosing the types of postal financial services to offer and the business strategies to adopt, Postal operators define their business model. These models are constantly evolving because of economic and political changes, making it difficult to identify winning models and strategies. In general terms, Post Offices have adopted one or a combination of five business models (BMs) described below, presented in order of increasing commitment and potential impact on revenues and financial inclusion.

**Figure 4: Business models for Post operators offering Postal Financial Services.**



Source: Authors' elaboration based on Universal Postal Union (UPU), 2016.

**BM 0: Real estate provider (no provision of financial services)**

Under this strategic model, the Post Office enters into an arrangement with an external financial services provider whereby the partner uses the space rented in a postal branch to install an office or a window, and provides its own services with its own staff. In this case, the Post Office plays no role in the provision of the services.

**BM 1: Cash merchant**

The Post Office acts as a cash-in/cash-out agent for one or various partners (Money Transfer Operators (MTO); Mobile Money Operators (MMO); government entities; utility companies; financial institutions, etc.). The services facilitated by the Post Office are transactional financial services, such as remittances, bill payments, mobile payments, account withdrawals/deposits. This is the easiest model to deploy for Post Offices that are starting to offer financial services as it does not require much know-how and is relatively inexpensive to organise.

**BM 2: Proprietary domestic and cross-border payments**

The Post Office operates its own domestic payments and international remittance services (for the latter, also in partnership with other Post Offices).

**BM 3: Partnership with a financial services provider**

The Post Office partners with a financial services provider, such as a bank, an insurance company, an MTO (Money Transfer Operator), or a microfinance institution (MFI) to offer the financial services of that partner. The main difference from the previous model is that the Post Office is not merely providing cash-in/cash-out services, but is much more involved in the provision of the services. Products can be developed jointly with the partner and adapted to the postal clientele. In many of such partnerships, the postal brand is used to sell financial products. In the BM 3 model, the Post Office is involved fully in all front-office aspects and postal staff has an important role to play in promoting financial services.

**BM 4: Postal savings bank**

Under this model, the Post Office offers its own insurance and/or account-based services (savings or current accounts), under a regulatory framework that is specific to the Post. This is the traditional postal savings model. Usually in BM 4, the Post is not allowed to offer lending services or any other sophisticated financial products, which is often one of the main reasons why Post Offices are willing to transition to BM 5.

**BM 5: Fully-fledged postal bank**

Under this model, the Post Office offers its own insurance and/or account-based services as well as loans, but under the supervision of the central bank or financial services regulatory authority. In some cases, postal banks still have some limitations either on the type of product they can offer (not all types of loans for example) or the clientele they can target. The products have the postal brand and are defined in accordance with the role of the Post Office.

**Key Points**

- *The Post Office is currently suffering from weak financial performance, and lacks a clear plan to ensure its long-term sustainability.*
- *Revenues from financial services via Post Office Money are increasing but still limited, both in terms of the range of products generating revenues and in terms of plans to grow the banking business.*
- *The revenues currently generated via Post Office Money are substantially below those achieved by Posts offering financial services via a Post Bank in other countries.*

## 2. The Partnership with the Bank of Ireland UK

As mentioned above, the provision of banking services of the Post Office relies almost entirely on the partnership with the Bank of Ireland (UK) plc, which is a separately incorporated subsidiary of Bank of Ireland Group, employing 505 staff (full-time equivalent) in the UK at the end of 2016. The partnership was first established in 2003 as a joint venture and in 2007 it was renewed to 2020. In 2012, the Bank of Ireland bought out the Post Office's share of the joint venture and moved to a contractual relationship, defined as an *exclusive partnership*, which runs until 2023. The Bank of Ireland (UK) plc has no branches and relies on Post Office branches to distribute financial products and raise deposits. Table 3 outlines the bank's recent history. The Bank of Ireland was severely affected by the financial crisis and needed two state bailouts. The European Commission (EC) approved two restructuring plans in 2010 and 2011, which entailed deleveraging and selling non-core activities, including the exit from its business banking and corporate banking activities in Great Britain.

**Table 3. Key events for the Bank of Ireland (BOI) after the financial crisis**

<b>2009</b>	<b>The Irish government provides €3.5bn for recapitalisation of the BOI and other state aid assistance.</b>
<b>2010</b>	Bank of Ireland UK plc is incorporated and established as a separate legal entity. The partnership with the Post Office (created in 2003) in terms of a <b>Joint Venture is extended to 2020.</b> A first restructuring plan was approved by the European Commission (EC), on 15 July 2010. The plan anticipates that the BOI will pay a considerable proportion of its own restructuring costs, to limit competitive distortions deriving from state aid. The BOI is forced to reduce its presence in certain market segments through the transfer or winding down of assets and through divestitures. <b>The plan requests that the BOI significantly reduces its presence in the UK corporate lending market.</b>
<b>2011</b>	The EC confirms the second restructuring plan for the BOI in December 2011. The plan is meant to restore the bank's viability by exiting risky portfolios and by implementing more prudent risk management practices. The BOI will have to substantially deleverage its balance sheet to reduce its dependency on wholesale funding, and will need to refocus its business model on balanced-risk lending in Ireland and the United Kingdom. The plan also ensures a fair burden sharing of past losses and that the bank and its capital providers contribute significantly to the financing of the restructuring costs by selling several businesses and portfolios.
<b>2012</b>	The BOI records a loss of €1.8bn (£1.6bn) for 2012. The value of customer deposits rises from €16bn to €19bn during the year, exceeding expectations. <b>The BOI buys out the Post Office from their 50% share in the joint venture (Midasgrange Ltd). The new partnership agreement is extended to 2023.</b>
<b>2013</b>	The EC authorises changes to BOI's second restructuring plan, approved in December 2011. The BOI is no longer required to divest New Ireland Assurance Company (NIAC), but <b>confirms the exit from the Great Britain Business Banking and Great Britain Corporate Banking businesses.</b> Additionally, the Irish authorities commit to ensure that the BOI will extend limitations on the distribution of



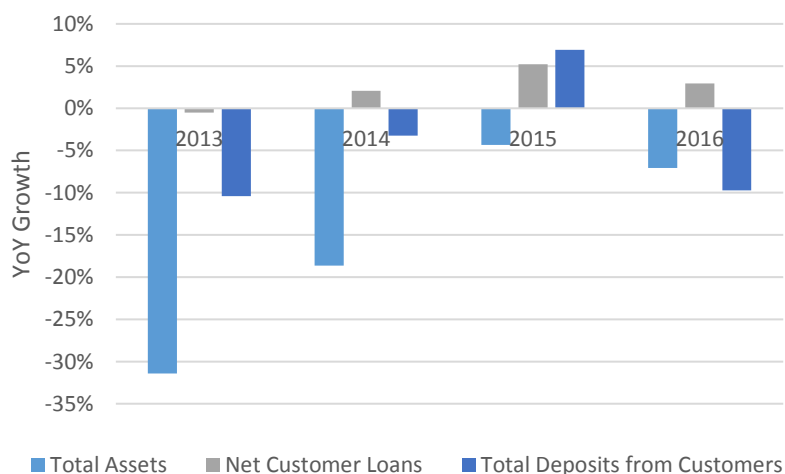
	dividends beyond December 2015 or until it has reimbursed the Irish State for the preference shares.
<b>2014</b>	Regulation of the bank transferred to the European Central Bank (ECB).
<b>2015</b>	The Bank of Ireland sells the joint insurance business to the Post Office Ltd, which incorporates it into its subsidiary Post Office Management Services Limited.
<b>2017</b>	The Group intends to implement a corporate reorganisation, which would result in the Bank of Ireland Group plc (BOIG plc) being introduced as the listed holding company of the Group. The reorganisation will be implemented by a scheme of arrangement under the Companies Act 2014 (the "Scheme"). The corporate reorganisation was required by the EU's Single Resolution Board and the Bank of England to provide a framework for the bail-in of bondholders in the event of another financial crisis.

Source: EU Commission, Bank of Ireland and Post Office press release.

After several years of severe losses following the financial crisis, the Irish lender returned to profitability in 2014. Despite posting a pre-tax profit of about €1bn in 2016, the overall performance of the Bank of Ireland is still uncertain as the latest profit figure is 16% lower than in 2015.

Since its establishment, the overall performance of the UK subsidiary of the Bank of Ireland has been similarly lacklustre, as illustrated in Figure 3, with a noticeable decrease in 2016 in terms of total assets and total deposits from customers.

**Figure 3: Bank of Ireland expansion into the UK banking system**



Source: Data from Bank of Ireland (UK) annual reports.

Commenting upon the performance of the Bank of Ireland UK, analysts suggest that the lender still faces several challenges, both legacy issues and several new ones.<sup>2</sup> Among the new potential threats to the Bank of Ireland's operations are the risks deriving from currency fluctuations following the Brexit referendum, the potential litigation costs and reputational

<sup>2</sup> The legacy problems derive mainly from the Irish bank financial operations and do not relate to the UK portfolio.

losses related to the tracker mortgage review case and the need for restructuring its IT system.<sup>3</sup> We review these challenges below.

**Brexit.** Currency fluctuations strongly impacted the 2016 results. The Bank of Ireland has a substantial exposure to the UK market, the highest among Irish institutions. Due to the weakness of the pound, **profits in its UK retail business declined by 24 per cent to £106m** for the parent bank. The Bank of Ireland UK has 3 million UK customers, which is more than the adult population of Ireland. But the bank is a small player in a highly competitive market and therefore Brexit poses unique challenges for the Irish lender. With increasing risks and decreasing revenues from the UK market, the viability of the partnership with the Post Office is at risk.

**Reputation.** In terms of reputational risk, the Bank of Ireland is facing a review over potential mis-selling of a tracker mortgage. Against potential litigation costs, the bank has already set aside €25m. A large fine could also call into question the viability of the partnership with the Post Office.

**Rising modernisation costs.** For Bank of Ireland to remain competitive in the future, a major modernisation of its technology and infrastructure is overdue, thus raising IT costs substantially. The bank has earmarked capital expense of €225m annually over the next four years for this purpose. This represent a major investment for the lender, which will result in an increase in an already higher than average cost-to-income ratio.

#### Key Points:

- *The partnership with the Bank of Ireland has not delivered the expected and potential results.*
  - *Since the renewal of the partnership in 2010, the Irish partner had no plans for further expansion in the UK market.*
  - *In 2012, it exited from the Great Britain Business Banking and Great Britain Corporate Banking businesses.*
- *Because of the persistent negative legacy from the financial crisis, the partner is not expected to deliver significant growth in the near future.*
- *A partnership model with a large private bank for the provision of postal financial services leaves the Post Office's ambitions for growth dependent on the fortunes and willingness of the partner.*

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<sup>3</sup><https://www.irishtimes.com/business/financial-services/bank-of-ireland-s-results-something-of-a-curate-s-egg-1.2987751>

## **PART II. The new UK competitive landscape**

One of the reasons for the rejection of the proposal for a Post Bank in 2010 was the consideration that it would be difficult for it to become profitable in a highly competitive sector such as the banking sector. This statement was in line with the political view at that time: the UK public authorities opted for consolidation in the banking sector in the immediate aftermath of the financial crisis. Accordingly, in 2010 the UK banking sector was deemed as highly competitive. Nevertheless, this view has changed radically since then: the authorities have repeatedly expressed concerns about the lack of competition in the banking sector in more recent years.

In 2010, the Office of Fair Trading (OFT) published a report focused on competition in retail banking.<sup>4</sup> They concluded that “*new entrants face significant challenges in attracting personal and SME customers through a combination of low levels of switching, high levels of brand loyalty and consumers' preference for providers with a branch network.*”

In 2011, the Independent Commission on Banking presented its final report<sup>5</sup> and highlighted that: “*There are long-standing competition issues in UK retail banking. On the supply side, core markets are concentrated—the largest four banks account for 77% of personal current accounts and 85% of SME current accounts. On the demand side, competition between banks on current accounts is muted by difficulties of switching between providers and by lack of transparency about banking services on offer.*”

Partly as a response to these concerns, during the creation of the new institutional banking regulatory landscape, both the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) were given explicit objectives to promote competition. In particular, it is one of the three FCA objectives to promote effective competition, and a secondary objective for the PRA to act in a way that facilitates effective competition.

As part of this push towards increasing competition in the banking sector, the Financial Services Authority first, and the Bank of England later, simplified the process for obtaining a banking license. Additionally, to facilitate the process the New Bank Start-up Unit was set up at the Bank of England.

Based on these considerations, this section reviews the key changes that have impacted the UK financial sector in recent years, to foster an understanding of the industry a newly formed Post Bank would be operating in. Our analysis highlights the challenges as well as the opportunities in a fast-changing sector.

### ***Market competition***

The UK banking market is dominated by the presence of five large banking groups: Lloyds, HSBC, RBS, Barclays and Santander UK. Together, these large banking groups control over 50% of the mortgage market, 77% of the personal current account market and 85% of small business banking. These banks operate throughout the UK and provide the full range of retail banking services. In addition, there are a number of smaller banks and over 40 building societies. The largest six banks and building societies (the five above plus Nationwide) now

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<sup>4</sup> [http://webarchive.nationalarchives.gov.uk/20140402142426/http://www.offt.gov.uk/shared\\_offt/personal-current-accounts/oft1282](http://webarchive.nationalarchives.gov.uk/20140402142426/http://www.offt.gov.uk/shared_offt/personal-current-accounts/oft1282).

<sup>5</sup> <http://webarchive.nationalarchives.gov.uk/20131003105424/https://hmt-sanctions.s3.amazonaws.com/ICB%20final%20report/ICB%2520Final%2520Report%5B1%5D.pdf>

account for 80% of the outstanding household and corporate lending, up from 65% at the start of 2008.<sup>6</sup> Other providers also offer elements of retail banking services such as credit unions, alternative finance providers (for example, crowd-funding and peer-to-peer lending), as well as new payment providers offering digital wallets and other services (for example PayPal, Amazon, Google and Apple).

As mentioned before, there have been numerous investigations into the competitive nature of UK banking, most recently highlighted by the findings of the Competition and Markets Authority report on retail banking.<sup>7</sup> This highlights the authorities' desire to increase competition in the system, especially in the light of the high degree of market concentration<sup>8</sup> in certain sectors of the banking business—personal and SME areas. Concentration levels have increased since the financial crisis following Santander's acquisitions of Bradford & Bingley and Alliance & Leicester building societies and Lloyds Banking Group's acquisition of HBOS. Despite the divestment of TSB and the entry of challenger banks, the large banks have lost only 5% of their market share since 2005, thereby justifying the renewed focus on increasing competition.

### *i) Challenger banks*

Partly because of the authorities' efforts highlighted above, we have seen new entrants to the banking sector in recent years: in 2010 Metro Bank was the first new high-street bank to obtain a full banking licence in over a century (see Box 3 for a brief overview of Metro Bank) and since then several new banks have been authorised by regulators. The changes in the regulatory requirements and authorisation process, designed to reduce entry barriers in the sector and increase competition, have contributed to this new trend.

These new entrants are referred to as challenger banks because they compete in a market dominated by long-established operators. Technological and regulatory change have enabled the emergence of these new competitors. They have some advantages compared to traditional players: their size enables them to be nimbler, easier to manage and they are not hampered by old technology. Moreover, they have no legacy from the financial crisis. While many of these entities are unlikely to survive as stand-alone companies, triggering a likely wave of M&As with more established players—although not necessarily from the financial sector—will enable them to increase their competitive and disruptive potential.

#### **Box 3. Case Study: Metro Bank**

When it launched in 2010, Metro Bank was the UK's first new high-street bank in over 100 years. It offers a range of retail banking services to personal and business customers (including SMEs) in and around London. Its aims are to differentiate itself from other banks. Metro's strategy is based on building a strong and recognisable brand and offering a good customer experience, with a customer-focused culture borrowed from retailer-type operations. It is also defined a **branch-based challenger**, as it focuses on an innovative use of "stores" to attract customers. Today, Metro Bank has about 41 stores (opened in the last six years),

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<sup>6</sup> <http://www.bis.org/review/r140515b.htm>.

<sup>7</sup> Competition and Markets Authority. 2016. Retail banking market investigation. <https://assets.publishing.service.gov.uk/media/57ac9667e5274a0f6c00007a/retail-banking-market-investigation-full-final-report.pdf>.

<sup>8</sup> See Haldane, A. 2011. Control rights (and wrongs). <http://www.bankofengland.co.uk/archive/Documents/historicpubs/speeches/2011/speech525.pdf>.

with a further 59 expected by 2020. This strategy also differentiates Metro Bank for traditional banks, which are cutting costs precisely via branch closures.

### **The Set-up of a Challenger Bank**

2009 - Banking Authorisation process begins.

2010 - £75m of private capital raised (February).

2010 - Banking license granted (March).

2010 - Launch; first branch opened (July).

### **Financial Highlights**

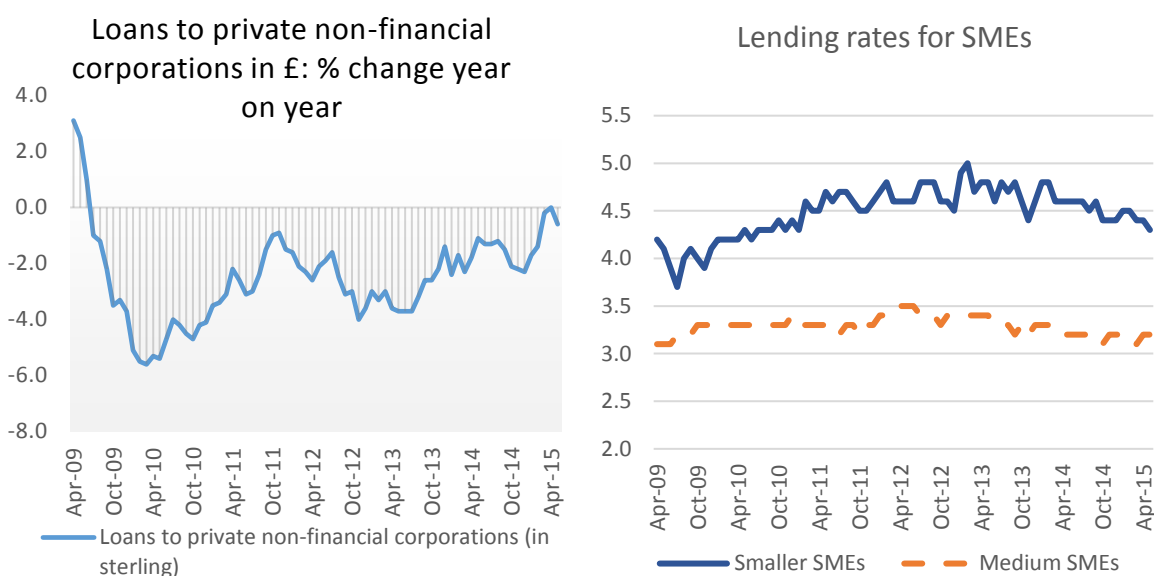
Six years later, Metro Bank is a fast-growing player in the UK retail service market. The results for 2016 confirm this trend:

- Asset growth up 64% year-on-year to £10,057m
- Revenue up 62% year-on-year to £195m
- Strong Common Equity Tier 1 capital ratio at 18.1%
- Record 260,000 increase in customer accounts to a total of 915,000

### ***ii) SME Lending***

Despite its paramount importance for the recovery of the economy, one type of business has found it difficult to recover: **Business and SME lending**. Business lending was severely affected by the crisis and decreased steadily between 2008 and 2015. As it can be seen in Figure 4, the annual growth rate of the outstanding lending to non-financial corporations in the UK remained negative until 2015. SME lending became expensive (especially for smaller SMEs) and mostly unresponsive to the unconventional monetary interventions during the post-crisis period.

**Figure 4. Business lending since the crisis**



Source: Bank of England – Credit Conditions Survey 2015Q2

A recent report by the Competition and Markets Authority and the Financial Conduct Authority<sup>9</sup> found that the provision of business current accounts (BCAs) and business loans is highly concentrated among the four top banks: they make up for 85% of BCAs and 90% of all business loans. These levels of concentration imply a Herfindahl-Hirschman Index (HHI) score of slightly below 2,500, the level that the U.S Department of Justice considers to be “highly concentrated”.<sup>10</sup> This feature has barely changed since 1999.

These two facts—**business lending has been decreasing for several years after the crisis, and it remains highly concentrated**—remain true even though there has been a significant political appetite to increase both SME lending and banking competition. An example is the Funding for Lending Scheme (FLS), an initiative launched in July 2012 by the Bank of England and HMT.<sup>11</sup> The policy provides cheaper funding for banks and building societies that invest in the real economy. It was further amended to incentivise lending to SMEs. The policy has provided more than £60bn funding.<sup>12</sup>

At the same time, more and more challenger banks have taken an interest in this type of lending; for instance, Virgin Money and TSB. However, they face the costs related to the high entry barrier—the need for a physical presence to encourage and support SMEs via branches. We will expand the discussion on this issue in Part III of this report.

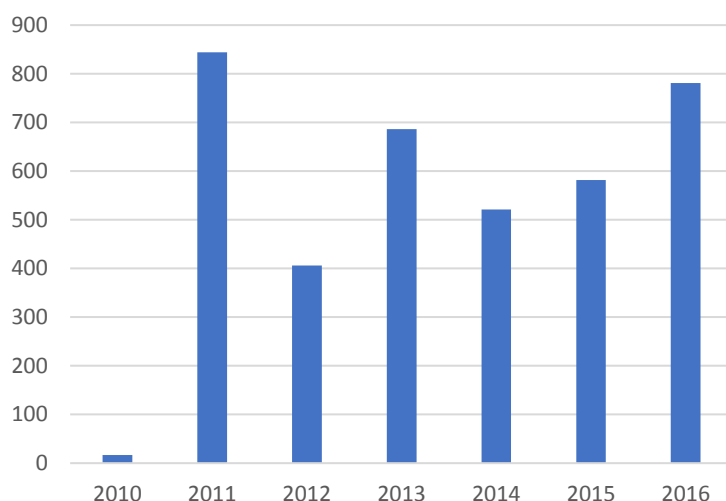
iii) **Branch closures**

Another reason why SME lending business has been suffering is the vast rate of bank branch closure—especially in more remote and rural areas. About 3,000 branches have closed over

<sup>9</sup> CMA & FCA. 2014. Banking services to small and medium-sized enterprises. [https://assets.publishing.service.gov.uk/media/53eb6b73ed915d188800000c/SME-report\\_final.pdf](https://assets.publishing.service.gov.uk/media/53eb6b73ed915d188800000c/SME-report_final.pdf).  
<sup>10</sup> <https://www.justice.gov/atr/herfindahl-hirschman-index>.  
<sup>11</sup> <http://www.bankofengland.co.uk/markets/pages/fls/default.aspx>.  
<sup>12</sup> <https://www.ft.com/content/a8b1d864-976c-11e5-95c7-d47aa298f769>.

the last decade, according to the Campaign for Community Banking Services, leaving around 8,000 in 2016. Data from SNL Financial indicate, as shown in Figure 5, that almost 4,000 branches have closed since 2010. In many areas, basic banking services are only available through the Post Office branches.

**Figure 5: Bank branch closures over the period 2010-2016**



Source: SNL Financial

Data from the big five banks derived from BBC research<sup>13</sup> and reported by the House of Commons<sup>14</sup> show that about 650 branches closed in 2015 and 2016 and Which? reported estimated closures in 2016 to be 1,046,<sup>15</sup> equal to 11% of the network of the seven largest banks. Some challenger banks, such as Metro Bank, are following an opposite strategy, expanding their network through branches in order to take advantage of the retreat of big banks. However, most of these branches are in major urban centres, while rural areas and communities are the most affected by bank branch closures and many of them are left with only certain basic services of the Post Office.

#### Key Points:

- *Regulators and policy makers have put in place initiatives to increase competition in the UK financial system, in particular in the provision of retail banking services.*
- *To this end, they have licensed new entrants, which are now fast-growing participants in the UK banking system, while traditional banks are still recovering from the financial crisis and dealing with post-crisis regulation.*
- *Among retail banking businesses, SME lending is suffering the most from high concentration and branch closures.*
- *While non-traditional competitors (challenger banks) find this business potentially attractive, they lack the required physical infrastructure to offer local business banking and SMEs services in a profitable manner.*

<sup>13</sup> <http://www.bbc.co.uk/news/business-36268324>

<sup>14</sup> Edmonds, T. (2016) Bank Branch Closure, Briefing Paper, House of Commons Library, Number 385, 15 December.

<sup>15</sup> <http://www.which.co.uk/news/2016/12/revealed-1000-bank-branches-shut-in-two-years-458451/>.

### PART III. A Post Bank model for UK

In this section, we outline the case for a Post Bank and present an analysis that illustrates the opportunities for the Post Office if it were to choose this strategy. We look at the change in regulatory requirements for the process of obtaining a banking licence and argue that to take full advantage of the new process the Post Bank should be set up as a separate subsidiary. We then look at the possible ownership structure and how to raise the initial capital. We discuss the growth opportunities for a Post Bank within the current market developments. Finally, we will show how a Post Bank can also help achieve broader objectives, both in terms of increased credit available to the economy and increased financial inclusion.

As a first step of this analysis, we note that there is an appetite for increased competition in the banking sector. This is evident in the number of new licences granted in recent years and by the fact that the supervisory authorities have reviewed and simplified the authorisation process.

In March 2013, the Financial Services Authority (FSA) simplified the process of obtaining permission to offer banking products. Now the permission is granted by the PRA (Prudential Regulation Authority, Bank of England), with the Financial Conduct Authority (FCA)'s consent.

The process is managed on a case-by-case basis. The managers of the firm seeking authorisation typically have a preliminary meeting ("pre-application stage") with the PRA at the Bank of England to present their proposal. This meeting's goal is to help the firm to prepare the application as well as possible. After this meeting, the regulators would explain the documentation that the firm needs to prepare, as well as the initial requirements. The whole process might take up to 6-12 months. Figure 6 illustrates the process.<sup>16</sup> The application is to obtain permission to undertake regulated financial activities. Deposit-taking, mortgages, and SME lending, for instance, all fall in this category.

**Figure 6: Banking licence application process**



*Source: Authors' elaboration based on Bank of England's guidelines*

<sup>16</sup> <http://www.bankofengland.co.uk/pranbsu/Pages/default.aspx>



We now turn to how a Post Bank could work in practice (see Box 4 for brief case studies of the Post Banks in Italy and France). Our proposal for a Post Bank considers the following aspects:

- i) **A separate subsidiary entity for financial services**
- ii) **Raising equity capital and ownership structure**
- iii) **Size and portfolio composition**
- iv) **Market analysis**
- v) **Capitalising on existing strengths**

#### **BOX 4: Successful Post Banks**

##### **POSTE ITALIANE AND BANCOPOSTA**

An example of a Post Office that has successfully expanded into different business areas is **Poste Italiane**, which started to focus on financial services when the European Union began liberalising postal markets in 1997. Italy's national postal service, Poste Italiane, became a public limited company in 1999 and relinquished their monopolies on many postal services. Today, Poste Italiane is partially state-owned (around 60% percent) after it completed an IPO in 2015. Poste Italiane has a network of 13,000 branches.

##### **Early set-up of the Italian PostBank**

1998 Poste Italiane becomes a public limited company

1999 BancoPosta is created as a business unit of Poste Italiane and Poste Vita, the Group's life insurance company, is established

2002 First profit for the Poste Italiane reported after fifty years in the red

2003 Postepay, the most widely used prepaid card in Europe, is created

2006 Poste Italiane pays its first ever dividend to shareholders.

2015 IPO on Italian Stock Exchange (40%)

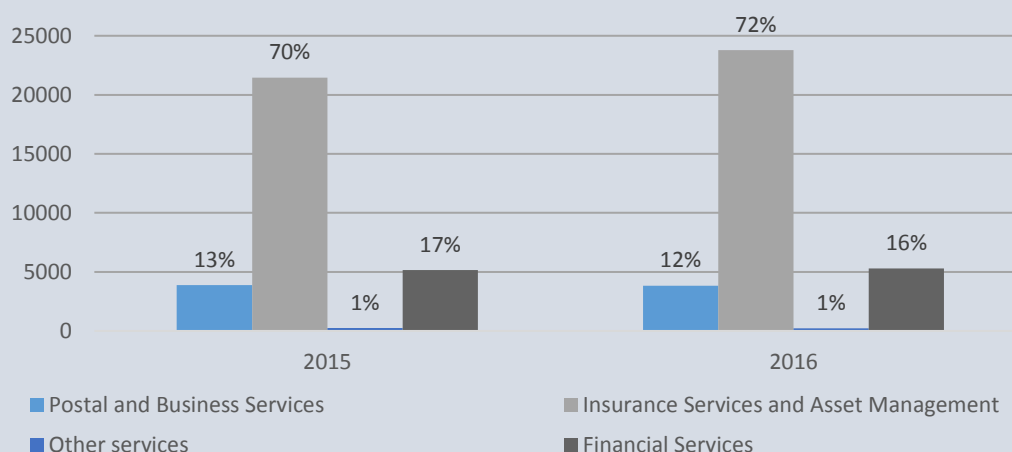
##### **Business diversification strategy and revenues**

Poste Italiane has earned a reputation for diversification and innovation. Along with postal services, the company offers integrated products in communications, logistics, finance, insurance, and mobile telephone services. Currently, Poste Italiane has plans to adopt mobile technology to improve and modernise all services and products.

Poste Italiane's revenues are generated by financial services, insurance services and asset management for more than 80% and only 13% from core postal services. In 2016, revenues increased by 7.7%. The improvement primarily reflects the positive performance of insurance services and asset management, where total revenue amounts to €23.8bn.

Poste Italiane saw a large increase in deposits in 2016 and 2017, as savings were transferred from traditional banks to the Italian Post Office due to the emerging evidence of Italian banks' bad loans.

**Figure 4.1: Poste Italiane's revenue by business units (in €m and as percentage)**



### **Institutional setting and capital regulation (ring-fencing)**

Banking services are offered via BancoPosta. Poste Italiane SpA manages BancoPosta's operations through an entity with ring-fenced capital, called BancoPosta RFC, established in 2011. At December 2016, the ring-fenced capital was equal to €3,386m.

### **LA POSTE AND LA BANQUE POSTALE**

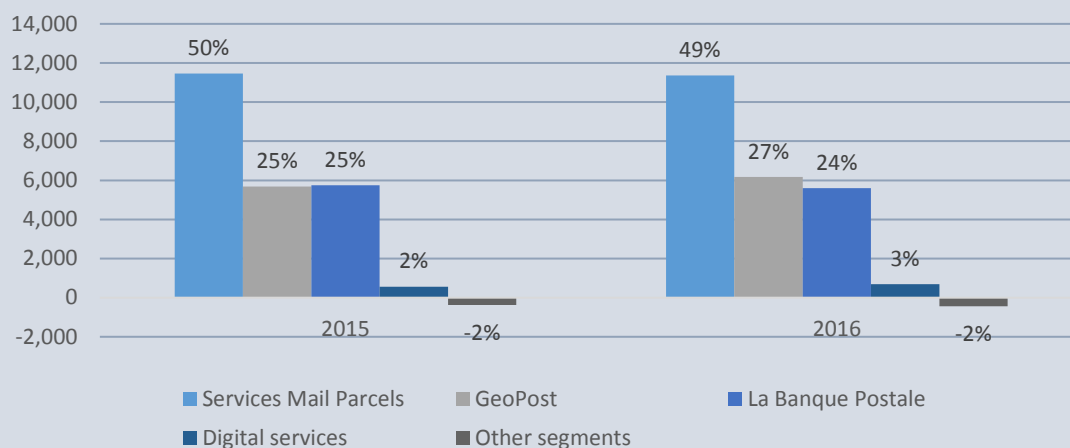
La Poste became an independent, public sector company in 1991, following the split of the French PTT, a government department responsible for mail, telegraph and telephone services. By the mid-1990s, the Group expanded into financial services, which soon generated about one-fourth of its revenues. In 1997, the French Government forced La Poste to separate its financial services products from its mail services, to reduce its competitive advantage. Meanwhile, La Poste was facing increasing competition in its mail and parcel delivery services. As a response, La Poste began diversifying its operations, including financial services offerings. To comply with French law and EU directives, banking activities had to be provided through a separate subsidiary. La Banque Postale was established in 2006 and it is currently one of the major public banks providing retail financial services in France, based on a network of about 17,000 outlets.

### **Multi-business model and revenues**

La Poste has a multi-business model which, next to more traditional postal services, includes logistics and corporate mail and parcels services, and digital services for corporations. In addition, La Banque Postale—a separate subsidiary—offers retail banking, insurance and asset management products and services.

The Group consolidated operating profit totalled €975m in 2016, up 11.5% from 2015. There are four main business units as shown in Figure 4.2 below. About 25% of the revenues come from the financial services offered by the Banque Postale.

**Figure 4.2: La Poste's revenue by business units (in €m and as percentage)**



### La Banque Postale

La Banque Postale Net Banking Income (NBI) was €5.60bn in 2016. Of these, NBI from the Retail banking division amounted to €5.24bn. At the end of 2016, La Banque Postale capital position was very strong, with a CET1 ratio of 13.7 %. The bank successfully expanded both deposits and loans: retail demand deposit reached €52bn (+6.4 % / 2015) while corporate credit outstanding saw the highest growth to €15.3bn (+25.9 % / 2015).<sup>17</sup>

#### i) A separate subsidiary entity for financial services

One of the goals of the Post Bank is to provide a steady stream of income for the Post Office to ensure its long-term viability and reduce its reliance on government subsidies. It is therefore crucial that the Post Office receives the profits of the Post Bank. Setting up the Post Bank as a subsidiary, fully or majority-owned by the Post Office, would achieve this objective.

There are different ways to set up a Post Bank in the Post Office. However, a fully-fledged subsidiary seems to be the right structure for several reasons: (1) regulatory purposes; (2) isolating risks related to financial services provision, and (3) management.

In this context, a separate subsidiary would simplify the process of obtaining a banking licence. In addition, as the new entity would be subject to the supervision of the PRA and FCA, a separate subsidiary would increase transparency and would allow for the separation of risk between the bank and the Post Office. This structure would also appease some of the concerns previously voiced by the government, that is, a Post Bank would create a much more volatile and risky balance sheet for the Post Office.

A separate subsidiary would also allow the Post Bank to have a separate management team, with financial markets experience and the ability to make independent decisions within the Group. This would also ensure that the management's decisions are not politically driven.

<sup>17</sup> [https://www.ipc.be/en/reports-library/publications/member-publications/le\\_groupe\\_la\\_poste\\_2016\\_ar](https://www.ipc.be/en/reports-library/publications/member-publications/le_groupe_la_poste_2016_ar)

There are numerous examples of government-owned financial institutions (for example, the Cajas in Spain) that have undertaken financial investments for political reasons rather than economic ones, with disastrous consequences for the sector in many countries.

To account for the fact that the Post Bank will be part of a government-owned group (The Post Office Ltd) and therefore subject to the Group's overall management, a possible model is that of *functional independence*. Under this model, while the overall goals are set by the Group management (and, in this case, the government), the way how these goals are pursued is a matter for the bank's management. An example of this is the Bank of England model. The Bank of England is not independent: its objectives are set by Parliament. However, the Bank of England is independent in the way it chooses to achieve these objectives—under their regulatory powers. The Post Office could do something similar: it would set the objectives—in terms of financial inclusion and portfolio composition—but the actual day-to-day operations would be performed by the management of the Post Bank.

## ii) **Raising equity capital and the ownership structure**

Another concern raised in the previous discussion on setting up a Post Bank back in 2010 was that capitalising a new bank would be time consuming and expensive. As mentioned before, the licence process can take less than a year. In this section, we discuss in detail the financial implications of raising equity to finance the Post Bank.

We note that raising the initial equity would be relatively cheap as current market conditions are favourable for this. There are various possible options available, each with different implications in terms of ownership structure, whereby the resulting firm would be either entirely or partially government owned.

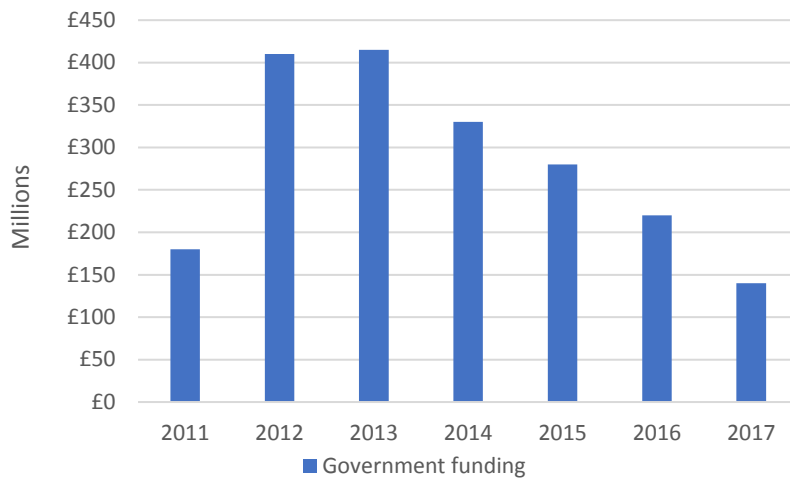
- ***Initial capital injection from the government***

The initial capitalisation could come directly from HMT. Under current arrangements, the Government is subsidising the Post Office annually; in the last seven years, it has provided funding in the region of £2bn, as it can be seen in Figure 7.<sup>18</sup>

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<sup>18</sup> We consider the last seven years to reflect the new funding structure set out by the coalition government in 2010, as highlighted in the document “Securing the Post Office Network in the Digital Age”. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/31809/10-1260-securing-the-post-office-network.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/31809/10-1260-securing-the-post-office-network.pdf).

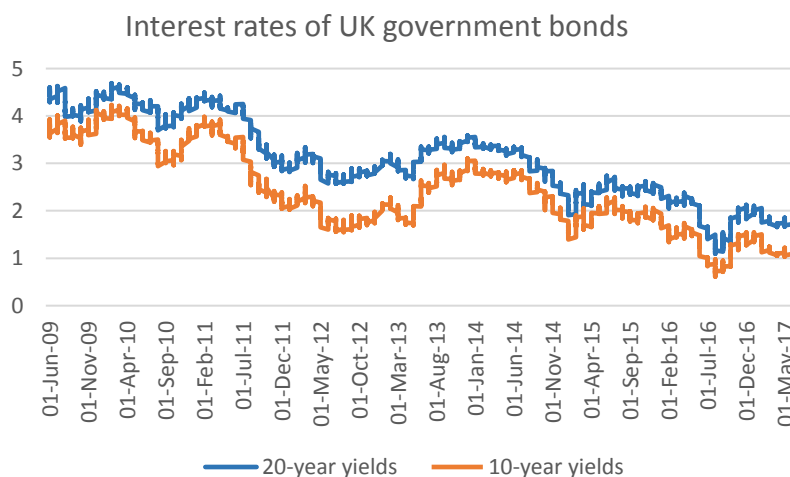
**Figure 7: Government funding to the Post Office over the period 2011-2017.**



Source: Post Office Annual Reports.

**Given the current low interest rate environment, it would be cheaper to capitalise the Post Bank than continue subsidising the Post Office.** The Government could issue long-term debt (20 – 30 years) to finance this equity. The UK Government is currently able to issue debt at a very low interest rate. As Figure 8 shows, the interest rates paid by the UK government on long-term debt are a fraction of what they were in the last stages of the financial crisis. The current yield for 10-year-bond securities from the British Government is very close to 1%. This means that issuing debt to finance the set-up of a Post Bank would not be expensive.

**Figure 8. Cost of issuing debt for UK government**



Source: Bank of England IUDLNPY and IUDMNPY series.

The low rates faced by the UK Government reflect their strong credit rating, which is set at AA despite some turmoil generated by the Brexit referendum. The Credit Rating Agencies have not changed their assessment since the referendum, and hence we expect that these ratings will continue in the medium term. Furthermore, the public debt levels are now under control,

and they are on the lower end when compared to other OECD countries—at around £1.7tr or 89% of GDP.

Therefore, an initial capitalisation of circa £2bn—we explain below how we arrive at this number—would have a minor impact on public finances. Indeed, the government has already spent a similar amount over the last seven years, just to ensure the on-going business of the Post Office. A key difference is that this investment would ensure its long-term sustainability.

- ***Post Office to issue long-term debt to finance initial equity***

There are alternatives to the Government raising the full initial equity of the Post Bank. For instance, the Post Office, rather than the Government, could issue long-term debt (20 – 30 years) to finance it. Ideally, this debt would be backed by HMT, making it very cheap—similar in terms of costs to the case where the Government would issue it directly. To the extent that the Post Bank is profitable—and we will see it should be—then this would not assume any burden for the Post Office operations.

- ***Government/Post Office issuing external equity***

There is also the possibility of issuing external equity. The Post Office does not need to retain 100% of its Post Bank participation in order to retain control of the entity: a 51% stake would suffice. Poste Italiane is an example of a Post Bank only partially government-owned. This option implies that the share of profits would be lower, but it also means that risks are shared and that the Post Bank's operations can potentially grow faster. Given the nature of the business of the Post Bank, with a strong component of financial inclusion, as we explain below, several firms could be interested in taking part of it, to boost their Corporate Social Responsibility (CSR) profile.

- ***Mutual ownership model***

The options we just described refer to the case where the Post Office sets up a Post Bank. There are, however, different ownership structures that characterise other types of financial institutions, such as mutual banks. Mutuals are owned by their customers, cannot readily raise external capital and rely almost exclusively on accumulated reserves of retained profits. These features can constrain their growth opportunities.

In the financial services industry, a mutual ownership model is followed by Building Societies, with some success. Building societies are mutual organisations, owned by their customers or members. Although technically they are not “banks” and do not offer the full range of banking services, as mutuals they are a subset of stakeholder-based financial institutions. In recent years, building societies have enjoyed political support as the importance of mutuals within a more diverse financial sector has been highlighted by policymakers and regulators. This support is also recognised by customers, as indicated by the high levels of satisfaction and trust.<sup>19</sup>

The government has promoted mutual ownership in various sectors, citing evidence that this ownership structure can help to ensure that decisions are focused on the long-term sustainability of the business.<sup>20</sup> The Government believes that Post Office Ltd could be ideally

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<sup>19</sup> Casu, B. and Gall, A. (2016). *Building Societies in the Financial Services Industry*. Palgrave Macmillan UK.

<sup>20</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/31678/11-1401-guide-mutual-ownership-models.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/31678/11-1401-guide-mutual-ownership-models.pdf)

suited to a mutual model; they do however recognise that a move to a mutual would not be possible until the business is on a more financially sustainable footing.<sup>21</sup>

### iii) **Size and portfolio composition**

Having discussed possible ways to raise the initial equity capital, the key question is *how much* initial capital would a Post Bank need. The answer to this question depends both on the size and the riskiness of the initial portfolio.

Equity capital is only a small part of a bank funding; the large majority of funds relates to retail deposits. More specifically, equity capital would only form around 5 – 10% of the total funding of the Post Bank. Most of the funding would come from different types of deposits, from personal current accounts (PCAs), business current accounts (BCAs), and savings products with different terms. As a retail-oriented bank, deposits could make around 70% of the total funding.

The rest of the funding would come from long-term debt to be placed to institutional investors. This long-term debt would have the implicit guarantee of the government, which again would make it cheap. Part of this long-term debt could also be offered to retail investors looking for a secure long-term investment.

- ***The size of the bank portfolio***

A crucial part of the process to set up the Post Bank, and something that needs to be decided before applying for a banking license, concerns its initial portfolio. We highlight several options, which are not mutually exclusive. This is, however, a simplified exercise, and a much deeper market analysis would be needed to inform appropriate decisions.

#### **OPTION 1: Acquiring the Bank of Ireland UK portfolio<sup>22</sup>**

A first option to explore is acquiring the portfolio of the current partner of the Post Office, the Bank of Ireland UK plc. Table 4 shows the balance sheet of this institution in 2016. Most of the asset portfolio is made up of loans to customers and mortgages. The liquidity is managed with cash and central bank balances, as well as some Available-for-Sale (AFS) financial assets.

**Table 4. Bank of Ireland UK plc – balance sheet in 2016**

<b>Assets: £25,960m</b>	<b>Liabilities: £25,960m</b>
Cash and CB balances: £1,172m	Deposits from banks: £2,691m
Loans to banks: £3,369m	Customer accounts: £19,475m
Loans to customers: £19,821m	Subordinated liabilities: £335m
AFS financial assets: £1,140m	Other liabilities: £1,409m
Other assets: £458m	<b>Equity: £2,050m</b>

Source: *Bol UK Annual Report 2016*

<sup>21</sup> <http://webarchive.nationalarchives.gov.uk/20121030091159/http://www.bis.gov.uk/assets/biscore/business-sectors/docs/b/12-939-building-a-mutual-post-office-government-response>

<sup>22</sup> <https://www.bankofirelanduk.com/fs/doc/wysiwyg/boi-uk-annual-report-2016-web.pdf>.

In terms of funding, most of it comes from customer accounts (75%). Among these accounts, £15,500m are already Post Office-branded deposits. Equity capital is around £2bn.

We believe that acquiring this portfolio—or a similar one—would constitute a solid *first stage* for the Post Bank. This is because most of its products have been offered through the Post Office branch network, and hence there is already expertise in the institution. As mentioned before, many of the Bank of Ireland UK products are already branded as Post Office. Moreover, the Bank of Ireland UK's current profits are well above the 2017-18 planned government subsidy to the Post Office; in other words, with such portfolio, the need for this subsidy would be eliminated. Finally, the Post Office undertook a similar operation when it acquired the Bank of Ireland share of their joint insurance business, which has become a profitable stream of revenues.

For comparison, if the Post Bank were to acquire the Bank of Ireland UK portfolio, it would be one order of magnitude bigger than many of the new challengers, and approximately *twice* as big as Metro Bank.

A key question relates to the price for such acquisition. If we estimate the UK subsidiary of the Bank of Ireland' market value to be equal to its book equity, the price would be around £2bn. This amount, as discussed above, could be raised in different forms.<sup>23</sup> Nevertheless, banks, especially the biggest ones, currently have price-to-book ratios below 1.<sup>24</sup> In other words, the market value of these institutions is below their book value. The Bank of Ireland UK could be a similar case, therefore reducing the price of the initial investment to below the £2bn price tag. An important remark on these lines is that, given the difficulties discussed in Part I, the Bank of Ireland might be forced to divest from the UK market, making the acquisition terms advantageous for the Post Office.

## **OPTION 2: A new partnership or merger with a challenger bank**

Another option to consider is to partner or merge with one or more challenger banks. There are two main reasons why this option would be beneficial: expertise acquisition in some banking products and technology.

The Post Office has already expertise in offering some banking products, such as mortgages and savings accounts. Other types of products, such as business accounts and SME lending, have not been provided in Post Office branches and hence the institution lacks expertise. Therefore, especially if one of the objectives is to expand in a type of product without prior experience, using the expertise of challenger banks—via partnership or acquisition—would ensure that the products meet the customer demand.

The other reason is the technology. Challenger banks are new, and hence most of their technological infrastructure has been built very recently. Older institutions tend to have lower flexibility to improve their IT, which is associated with higher operating expenses. For this reason, acquiring a challenger's technology would put the Post Bank in a good position to contain costs and be profitable enough to sustain other parts of the Post Office.

Table 5 below provides a summary of some challenger banks that focus on the SME sector, which is a target market segment but also one where the Post Office lacks strong expertise.

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<sup>23</sup> This would amount to approximately 0.12% of the Government debt in the UK.

<sup>24</sup> <https://www.bloomberg.com/news/articles/2016-06-16/europe-s-biggest-banks-are-worth-more-on-paper-these-days-chart>.



This sector would offer strong growth opportunities for a Post Bank. Most challenger banks have relatively small portfolios, but as already mentioned, this would not be the main reason to join forces with them. Importantly, none of these challenger banks have a branch network: they could be very interested in having access to the Post Office's extensive one.<sup>25</sup> The last column of Table 5 shows the equity of these banks when available, which serves as an approximation of the cost of acquiring these institutions.

There are several players which are of potential interest. First, the **British Business Bank**, a government-owned business development bank dedicated to making finance markets work better for smaller businesses. We understand from the Communication Workers Union that this is an option the government is aware of and may consider for the Post Office. A closer relation or partnership with the British Business Bank would help the Post Bank gain market share in the SME lending market, as well as capitalising on the state-owned development bank's expertise. In numbers, the British Business Bank currently supports over 48,000 small business, for over £3.1bn, through its partnership with other lenders.

Another note-worthy example is the **Cambridge & Counties Bank**, a unique partnership between two established and respected institutions—Trinity Hall, Cambridge & Cambridgeshire Local Government Pension Fund. This bank is of interest in this context, as it is a partnership with a Local Authority.

Finally, the **Community Savings Bank Association (CSBA)**, a new association which markets itself as “customer owned local banking for Britain” and aims to create a UK-wide network of customer-owned, regional banks to serve the every-day financial needs of ordinary people, local community groups and small and medium sized companies.

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<sup>25</sup> Some of these banks are more digitally-focused, but this is partly by necessity, since the initial investment required to set up a branch network is too high for them.

**Table 5. Challenger banks specialising in SME lending**

<b>Bank</b>	<b>Banking License</b>	<b>Business Model</b>	<b>Equity</b>
<b>Aldermore Bank</b>	Established in 2009, Aldermore is essentially the reincarnation of private bank Ruffler after it was sold off to private equity group Anacap Financial Partners.	Serving customers and intermediary partners online, by phone and face to face through our network of twelve regional offices	£626m
<b>British Business Bank</b>	A government-backed bank	A development bank (start up; scale up and stay ahead)	£791m
<b>Cambridge &amp; Counties Bank</b>	Granted a licence in 2012; it is fully in operation	It is owned by Trinity Hall Cambridge and Cambridgeshire Local Government Pension Fund	£29m
<b>Community Savings Bank Association (CSBA)</b>	Originally working with Airdrie Bank, which failed in 2017. The banks' model and legal form has been agreed with the FCA and registered. Individual banks will apply for banking licences	Mutual business model. CSBA intends to set up a network of independent, customer-owned, regional banks to support local communities and businesses. Once set up, these banks will own and run the CSBA	NA
<b>Hampshire Trust Bank</b>	Granted. Formed in 1977, relaunched in 2014.	Specialist lender.	NA
<b>OakNorth</b>	Granted in 2015	A start-up bank, focusing on business lending	£81m
<b>Redwood Bank</b>	Granted in 2017 (subject to restrictions). In post-authorisation mobilisation phase	SME Business Bank. It will provide secured lending products and deposit accounts to SME businesses	NA
<b>Shawbrook Bank</b>	Formed in 2011, owned by RBS Equity Finance	Specialist lender	£370m
<b>Tide</b>	Tide is a current account, not a bank.	Tide is a business current account aimed at sole traders and SMEs.	NA

Sources: annual reports and websites of the different institutions.

#### **iv) Market analysis**

Another concern raised by the government to the previous Post Bank proposal was that it would be extremely difficult to build a significant market share quickly in a competitive market. We argue that there is room for growth in the UK banking sector, as demonstrated by Metro Bank. We build the case by considering the current revenues of the Bank of Ireland UK and comparing it with the growth rate of Metro Bank.

##### ***Revenues of Bank of Ireland UK***

The Bank of Ireland UK had £193m in profits in 2016. We take this number as a close estimate of the initial profits that the Post Bank would be able to obtain if it acquired the Bank of Ireland UK portfolio. While it is true that the transition from the Bank of Ireland UK to the Post Bank could carry some costs, the Bank of Ireland UK has been underinvesting in recent years and hence the potential profits of its current portfolio are probably higher.

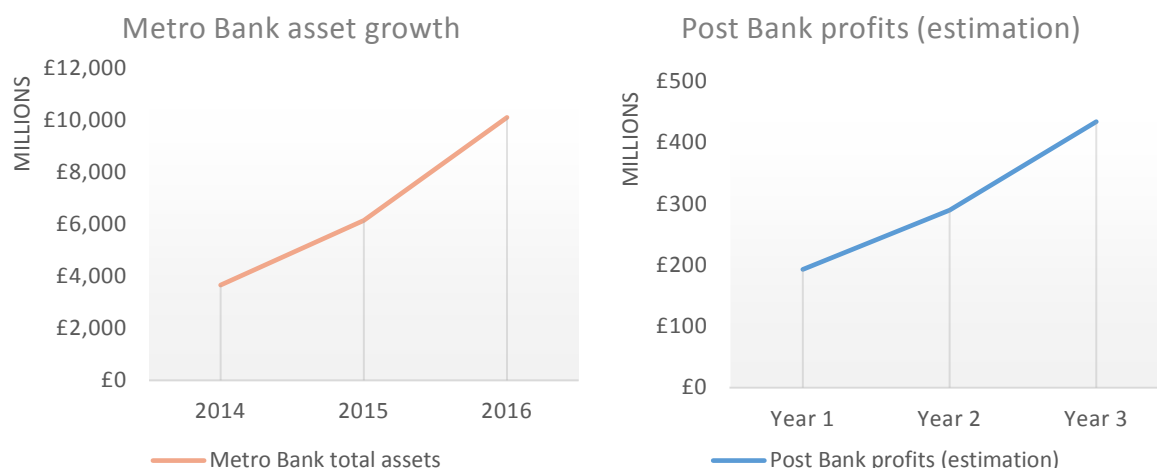
The current profits are higher than the average Network Subsidy Payments from the UK Government in recent years, which means that such operation would allow these payments to stop. This is one of the main objectives of the Post Bank: to make the Post Office financially viable without depending on regular government subsidies.

Moreover, the initial portfolio has a strong potential to grow substantially. Metro Bank, for instance, was growing its assets at a 64% growth rate in 2016.<sup>26</sup> Metro Bank's initial portfolio was smaller, but even in absolute terms, this growth amounts to £4bn, and this is without the availability of an extensive branch network to distribute the products. Figure 9 shows that Metro Bank has been able to maintain a growth rate above 60% the last two years.

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<sup>26</sup> <https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-reports-record-annual-growth-in-deposits-and-strengthening-profitability/>.

**Figure 9: Metro Bank asset growth vs Post Bank estimated profits**



*Source: Metro Bank and Bank of Ireland UK annual reports and authors' estimations*

A working assumption would be, then, that the Post Bank would be able to grow at similar rates initially. For instance, assuming a growth rate of 50% (slightly below Metro Bank's growth rate in 2016) during the first two years, this would imply that the profits by Year 3 would be above £400m. Profits and assets would grow at a similar rate in a Post Bank given that a large initial investment in a branch network is not needed.

These profits would be added to the current ones that the Post Office already receives for financial products; these products, such as currency services, should continue to be offered by the Post Bank. Furthermore, as we highlight below, we think that there is also an opportunity for the Post Bank in SME financing that would increase profits even further.

### **Branches**

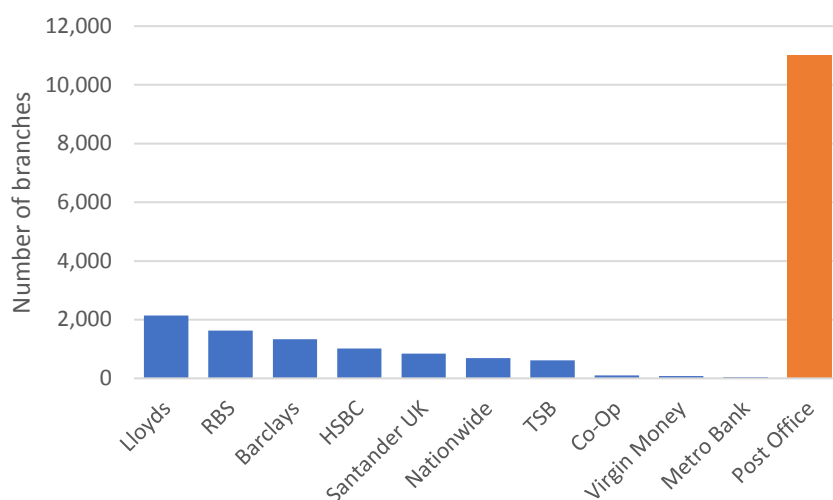
The assumption that the Post Bank would be able to grow significantly during the first years capitalises on the strongest asset that the Post Bank would have: its branch network. As we have mentioned before, the UK banking sector has experienced many branch closures in recent years, an on-going trend which accelerated after the financial crisis. There are pockets of customers that have had their banking options severely reduced, and here is where the Post Bank would have room to grow.

The branches of the Post Office are present in many areas where banks have no longer a presence. In fact, some banks have argued that the presence of the Post Office allows them to withdraw from some areas. When asked about why they dropped the pledge to stay open when RBS was the last bank in town by the Treasury Committee, Moray McDonald, Managing Director of Products, Personal and Business Banking Division, mentioned that *"We have an alliance with the Post Office, which has 11,000 locations—more than we ever could have"*.<sup>27</sup>

As Figure 10 shows, the Post Office has more branches than the rest of the banks in the UK combined. Not only that, but its distribution is not as centered around urban areas as it is the case for commercial banks.

<sup>27</sup> Briefing paper 385, "Bank branch closures".

**Figure 10: A comparison of branch network of the Post Office vs major UK banks**



Source: SNL Financial and Post Office

At the moment, the Post Office has agreements with several banks so that the customers can access their bank accounts and perform some basic operations. Nevertheless, the branch network could be much more profitable if it was used directly by the Post Bank.

The reduction of bank branches has been a trend for at least 30 years. In fact, nowadays there are less than half the number of bank branches as compared to 1988.<sup>28</sup> One of the reasons for this trend is related to technological advances and the diminished need of continued interaction between the bank and its customers. The recent digitalisation push is also contributing to the lower use of branches. According to a report by the British Bankers Association (“Digital Disruption”),<sup>29</sup> “the number of people going into branches to do their banking is falling dramatically (by around 30% in the last three years)”. However, this decline is not homogenous across gender, age and income (as we show in the next section on financial inclusion).

While some banks are pursuing this strategy, a few others, such as Metro Bank, have developed a different business model where branches—stores, as they call them—are at the centre of it. In the words of Craig Donaldson, its CEO, “I see the store as central to what we do”. Part of the reason why customers are using branches less and less is because, in an effort to cut costs, the services offered in branches have been progressively cut down and customers encouraged to use online services. While some challengers are countering this trend and expanding their branch network, this is far from enough to compensate the branch closures of the main banks. Not only that, challenger banks will typically open their branches in places where they can be more profitable, and this means that they will expand around urban areas whereas more rural areas are barely serviced by either traditional or challenger banks.

For a Post Bank, the marginal cost of keeping a large branch network is very small as it would be capitalising on the existing real estate of the Post Office Ltd rather than having to acquire or lease new buildings. This would allow the Post Bank to achieve an immediate national

<sup>28</sup> Ibid.

<sup>29</sup> <https://www.bba.org.uk/news/reports/digital-disruption-uk-banking-report/>.

presence and therefore become a competitive player much faster than challenger banks could achieve.

As we shall see in the next sections, some customers, especially SMEs, do still use bank branches frequently and hence would benefit from a Post Bank operating through Post Office branches.

### ***Opportunity in SME finance***

As explained in Part II, the banking sector is particularly concentrated for SME products, both lending and business current accounts (BCAs). There are several reasons for this situation, but two of them stand out: small businesses value the presence of a branch network much more than other banking consumers, and they need their main lender to provide different products. This makes it very difficult for new competitors to enter this market: some of them lack the branch network infrastructure, and some of them specialise in specific products.

The Post Bank would be in an ideal position to reverse the low competition trend in this sector. Small businesses typically obtain finance via their main personal bank, as highlighted by a recent CMA and FCA report.<sup>30</sup> Moreover, small businesses use the Post Office branches on a regular basis, be it to send their products or to make payments. Therefore, the Post Bank would be able to use its extensive branch network, its existing retail products, and its current stock of business customers to build up a portfolio of SME lending and BCAs rapidly.

The revenues and volume of these businesses are substantial. According to the CMA and FCA report, BCAs generate in excess of £2bn in revenue a year. In terms of SME business loans, the total outstanding amount is around £90bn.

There are other reasons why the Post Bank would be better equipped than the large banks to undertake this type of business. Commercial banks have been reducing the supply of credit to SMEs because of a combination of debt overhang problems from the financial crisis and the new regulatory framework of Basel III: their objective has been to reduce risk-weighted assets, a measure of bank asset riskiness that is used to calculate the capital requirements, as well as costs associated with branches.

The Post Bank, on the other hand, would not need to deleverage as commercial banks have done. Moreover, the branch network already exists as it is needed for postal services, so the marginal cost associated to branches is much smaller than for commercial banks. Furthermore, the main line of business would be domestic retail and SME, which would isolate the Post Bank from global shocks and make their activities less pro-cyclical; this is in line with the empirical evidence that government-owned banks' lending is substantially less pro-cyclical than private banks' lending.<sup>31</sup> As seen during the financial crisis, this is very important since it means that the Post Bank would counteract, rather than exacerbate, future recessions.

Targeting SMEs lending and BCA, therefore, would increase competition in the sector and allow the Post Bank to obtain substantial revenues from these activities. But there are other social benefits. The increased availability of products for SMEs would be more important in

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<sup>30</sup> CMA / FCA (2014) "Banking services to small and medium-sized enterprises"  
([https://assets.publishing.service.gov.uk/media/53eb6b73ed915d188800000c/SME-report\\_final.pdf](https://assets.publishing.service.gov.uk/media/53eb6b73ed915d188800000c/SME-report_final.pdf)).

<sup>31</sup> Bank ownership and credit over the business cycle: Is lending by state banks less procyclical? By Ata Can Bertay, Asli Demirgüç-Kunt, and Harry Huizinga. Journal of Banking & Finance 50, 2015.  
<http://www.sciencedirect.com/science/article/pii/S0378426614000958>.

areas where commercial banks have recently been retreating from, typically more rural and poorer areas. Therefore, these areas would benefit more from the existence of the Post Bank: banking products availability would improve their SMEs' performance, which would have positive economic consequences for these areas.

Given the privileged position that the Post Bank would have, it could acquire a substantial market share in the SME segment in a relatively short period of time, especially if it partners with an institution with some expertise. Several surveys suggest that there is strong demand from SMEs for better banking services.<sup>32</sup> We suggest, as an initial target, a goal of 5% of the market share. Acquiring a 5% market share in small business loans would give rise to a portfolio of circa £5bn, and it would amount to £100m in terms of profits from BCAs.

This SME lending portfolio would need additional equity capital to maintain healthy solvency ratios. For the mentioned portfolio of £5bn, this would imply additional equity of around £500m. However, this would be a gradual process, and the Post Bank's own profits could be used to build up this additional equity to enter into the SME market segment, without the need of an additional equity injection by the government.

## v) Capitalising on existing strengths

### **Brand**

The perception of banks by the public in the UK is generally negative. The financial crisis, together with the excesses of the sector and its conduct scandals, has increased the mistrust towards banks. A report by YouGov<sup>33</sup> published in 2013 highlights that 73% of the people surveyed described the reputation of banking as bad, the highest number among the industries they tested.

The industry itself recognises this issue. Antonio Simoes, the CEO of HSBC, believes that "*the public trust in us might take a generation to re-establish itself*".<sup>34</sup> Mark Carney, the Governor of the Bank of England, has expressed similar thoughts: "*A series of scandals ranging from mis-selling to manipulation have undermined trust in banking, the financial system and, to some degree, markets themselves.*"<sup>35</sup>

The Libor and the PPI scandals are probably the two best known recent misconduct behaviours, but they are not the only ones. As Figure 11 shows, the FCA has imposed 155 fines since 2013, with the total amounting to over £3bn. Even in the first months of 2017, fines of a total of £163m have been imposed.

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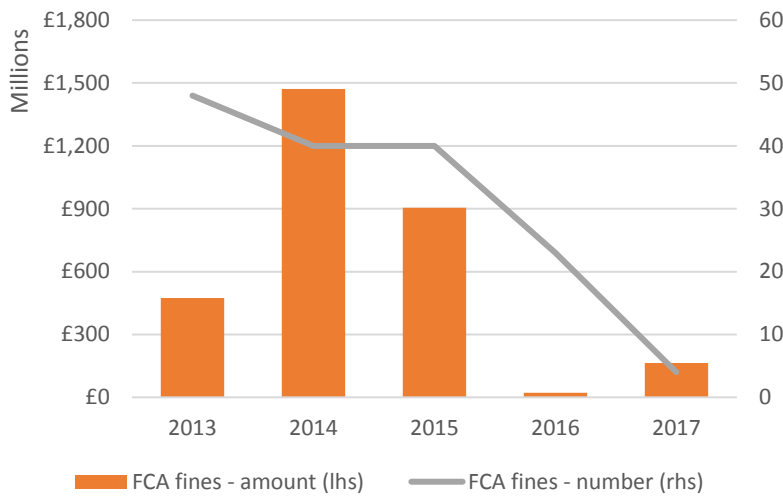
<sup>32</sup> <https://yougov.co.uk/news/2017/05/22/smes-want-banks-do-more-support-business/>.

<sup>33</sup> [http://cdn.yougov.com/cumulus\\_uploads/document/y1f7gpof19/Public\\_Trust\\_in\\_Banking\\_Final.pdf](http://cdn.yougov.com/cumulus_uploads/document/y1f7gpof19/Public_Trust_in_Banking_Final.pdf).

<sup>34</sup> <http://www.telegraph.co.uk/business/2016/03/08/hsbc-boss-customers-wont-trust-banks-for-a-generation/>.

<sup>35</sup> <http://www.bankofengland.co.uk/publications/Documents/speeches/2017/speech970.pdf>.

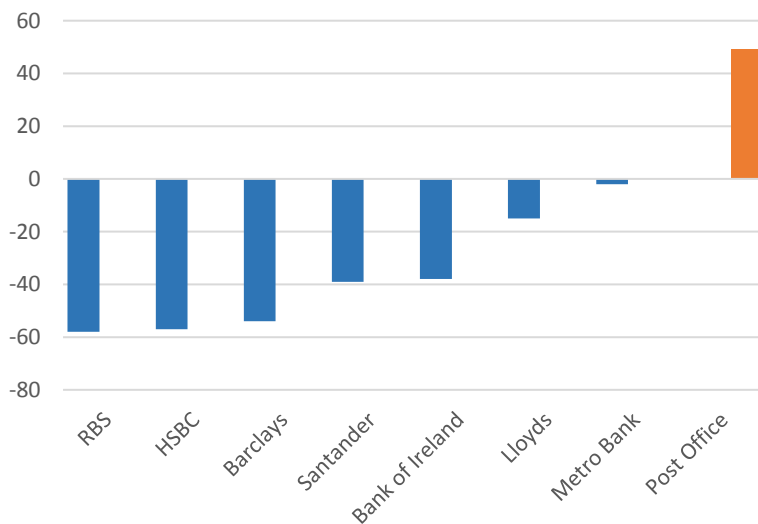
**Figure 11: Fines on banks for misconduct cases in the period 2013-2017**



Source: FCA website.

In contrast, the public opinion of the Post Office is very positive. A recent survey showed that the Post Office is the second most trusted brand by the British people.<sup>36</sup> The website YouGov, where users can rate different brands, shows the difference in perception between banks and the Post Office. Figure 12 shows that the ratings for the top banks are significantly negative; the current partner of the Post Office, the Bank of Ireland, is no exception. Even Metro Bank, which is a new lender with a strong focus on customer service, has a slightly negative rating. The Post Office, on the other hand, shows a highly positive rating.

**Figure 12. Brand perception for the Post Office vs other banks.**



Source: YouGov (June 2017)

<sup>36</sup> <http://www.thedrum.com/news/2014/04/11/britons-trust-aa-post-office-boots-and-google-more-any-other-brand>.



This positive perception would allow the Post Bank to attract customers more easily and faster than new challengers could achieve, since it would capitalise on an already known and valued brand.

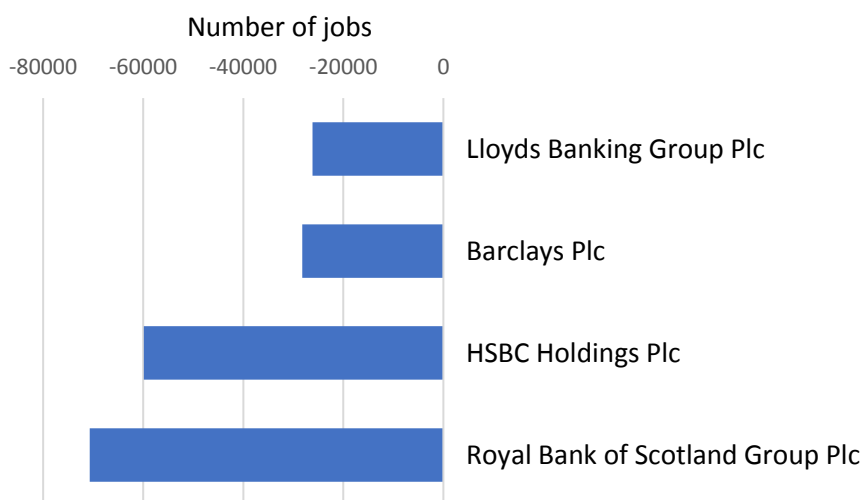
### **Skill availability**

The Post Office has already a number of staff with the relevant skills. For example, there are mortgage advisors in approximately 100 larger branches. While the Post Office will be able to retain and retrain some of the current workforce, it is also true that a Post Bank will require a recruitment drive for personnel with the right skill set. This can be also seen as an opportunity to create highly skilled jobs, particularly in areas where there is a paucity of opportunities.

A key impact of the financial crisis on the banking industry has been a severe cut in jobs in order to reduce costs. As for the bank branch closure, this is an on-going process. The cumulative sum of the job losses over the period 2011- 2017 is presented in Figure 13 for the Big-4 UK banks. In absolute term, full time equivalent workers (excluding temporary workers) that have been dismissed by the Royal Bank of Scotland numbers to above 60,000. On similar level are the jobs cuts by HSBC. Slightly behind, we find Lloyds and Barclays. Even assuming that some of these workers have been absorbed by the fast-growing challenger banks, many have been left behind.

A Post Bank will need their expertise to adequately offer banking products and more in general the management skills to run the banking business—for instance in terms of marketing strategy, risk management and accounting. Part of this expertise could come from bank staff that were laid off but have the relevant skills and experience in the different banking business areas in which the Post Bank will plan to expand. The upside will also be to alleviate the negative implication of banks’ decisions on the economy in terms of employment.

**Figure 13. Job losses in Full-Time Equivalent terms since the financial crisis**



Source: SNL Financial

## **Financial inclusion**

UK banking was traditionally centred on physical branches and personal interaction with bank staff; for this reason, branch closures are worsening the ability to access financial services particularly in remote and less densely populated areas. As noted by the FCA,<sup>37</sup> “*bank branch closures are commercial decisions by banks that may disproportionately affect certain consumer segments such as older people, those in low-income communities... and small business.*”

The government has acted upon these concerns by negotiating with banks to maintain an adequate coverage of the most remote areas, and in most of the cases suggesting the use of Post Office branches. However, only basic banking services are offered in this case. Given that physical branches are still crucial for accessing to banking services, particularly for those customers who are less likely to have internet access, the set-up of a Post Bank would allow the offering of retail services via an extensive network and thus alleviate the additional financial exclusion created by bank branch closure and their reliance on online banking services.

This issue is very relevant for a considerable part of the population: around 1.5 million UK adults remain unbanked;<sup>38</sup> 3.8 million UK households do not have internet at home, and 12 million people live in rural or remote areas of the UK where poor internet access can make it difficult for them to manage their money online.<sup>39</sup> Moreover, 1 in 5 consumers in UK lacks digital skills.<sup>40</sup>

Access to financial services is globally recognised as important to financial stability and the integrity of markets. Consumers excluded from mainstream financial services are more likely to use the cash economy and alternative providers. In the process, they are more vulnerable to being exploited or scammed by criminals. More in general, research has indicated that financial inclusion facilitates greater participation in the economy and cost savings. Indeed, formal financial services, such as savings or insurance, can help planning and provide protection against potential income losses deriving from illnesses, accidents and natural disasters. Access to credit for micro, small and medium-sized enterprises is an indispensable tool for economic growth. For people on low income, ready access to formal financial services can make the difference between poverty and the ability to stay above the poverty line.

Table 6 discusses the role that a Post Bank plays in terms of: i) easier and “wider” access to financial products for customers; ii) financial products offered to a larger set of customers, including traditionally “unbanked” customers; and iii) financial products offered at a lower cost, thereby contributing to socio-economic development<sup>41</sup>.

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<sup>37</sup> <https://www.fca.org.uk/publication/occasional-papers/occasional-paper-17.pdf>.

<sup>38</sup> Rowlingson, K., and McKay, S. 2015. Financial inclusion annual monitoring report 2015. <http://www.friendsprovidentfoundation.org/wp-content/uploads/2015/10/University-of-Birmingham-Financial-inclusion-report-2015-final.pdf>.

<sup>39</sup> Office for National Statistics, 2015. Statistical bulletin: Internet Access - Households and Individuals: 2015 <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/internetaccesshouseholdsandindividuals/2015-08-06>

<sup>40</sup> House of Lords, 2015. Make or break. The UK digital future. <https://publications.parliament.uk/pa/ld201415/ldselect/lddigital/111/111.pdf>

<sup>41</sup> Cull, R., Ehrbeck, T., and Holle, N. 2014. “Financial Inclusion and Development: Recent Impact Evidence”, Focus Note No. 92, CGAP.

**Table 6. Post Bank and Financial Inclusion**

<i>Main challenges</i>		<i>Post Bank's role</i>
<b>Access</b>	<ul style="list-style-type: none"> <li>• <b>Physical barriers</b></li> </ul> <p>This relates both to the ability to access financial services in the local community as well as the accessibility of these services.</p>	<p>The Post Bank would own one of the largest and most 'capillary' retail networks in the world which aims to connect all parts of a country - unlike banks which tend to concentrate in profit centres such as larger and wealthier cities.</p>
<b>Eligibility</b>	<ul style="list-style-type: none"> <li>• <b>Income</b></li> </ul> <p>Banks tend to focus on higher-income customers.</p> <ul style="list-style-type: none"> <li>• <b>Cost</b></li> </ul>	<p>Based on its unique public-oriented mission and universal service obligation, a Post Bank would be more willing to accept all types of customers (in terms of income, employee status, race, gender).</p>
<b>Affordability</b>	<p>The cost of accessing financial services, including both direct and indirect costs, is a main barrier to financial inclusion.</p>	<p>Post Banks can provide financial services at a large scale, which should enable them to exploit economies of scale, thereby minimising production costs and increasing their likelihood to be profitable</p>

Source: UPU (2016)

## **Final remarks**

In the above we have set out a case for the establishment of a Post Bank as a separate subsidiary of the Post Office. We envisage the Post Bank to be a modern, sophisticated and innovative player offering a range of banking services at a large scale. We argue that a Post Bank is a viable business opportunity that will contribute to the revenues of the Post Office, thereby ensuring its long-term sustainability and ending its reliance on government subsidies.

We make the following recommendations.

1. We recommend that the partnership with the Bank of Ireland should be ended, as it has failed to deliver the expected outcomes.
2. We recommend the establishment of a Post Bank that is (at least partially) owned by the Government and operates through the Post Office branch network.
3. We advise that the Post Office acquires the Bank of Ireland UK portfolio as the initial portfolio of the Post Bank, retaining all the customers that have acquired products and services white-labelled via Post Office Money.
4. We recommend the Post Bank to be set up as a separate subsidiary, with a separate management team and separate accounting, and endowed with its own capital.
5. We advise the Post Bank to make use of the capillary branch network to expand in SME lending and BCA segments.
6. We identify possible mergers or partnership with challenger banks that specialise in SME lending in order to acquire modern technology and skills.
7. We encourage the Post Office capitalise on its existing strengths, its strong brand and reputation, to fully benefit from the establishment of a Post Bank

## **About the Centre for Banking Research at Cass Business School**

*Specialist banking research, teaching and consultancy*

The Centre for Banking Research at Cass Business School promotes high calibre academic research in the field of banking. We also foster the teaching of banking subjects to a high standard. Drawing on the wide experience of our core and associate members, the Centre offers expert analysis of the economic and business environment that affects the banking and financial sector.

As such, we are able to provide specialist consultancy to the banking and financial services industry, public sector organisations, regulatory authorities and governments. Our core and associate members maintain extensive links to the International Monetary Fund, the European Central Bank, the Bank of England, the Financial Conduct Authority, HMT, Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation.

### **Professor Barbara Casu Lukac**

Professor Barbara Casu Lukac is the Director of the Centre for Banking Research at Cass Business School, where she is Professor of Banking and Finance. Her main research interests are in empirical banking, although several of Barbara's research projects are cross-disciplinary and include aspects of financial regulation, structured finance, accounting and corporate governance. Barbara has published widely, with over 40 publications in peer reviewed Journals. She has also written the popular textbook "Introduction to Banking" (Pearson FT), which is widely adopted for banking courses across the world. She has recently co-edited (with Thorsten Beck) the Palgrave Handbook of European Banking. Outside academia, Professor Casu has been a consultant/visiting researcher at several organizations, including the International Monetary Fund (IMF); the European Commission (EC); the SWIFT Institute; Centre for European Policy Studies (CEPS); the Building Societies Association (BSA). She is an advisory board member for the International Research Centre on Cooperative Finance hosted by HEC Montreal.

### **Dr Angela Gallo**

Dr Angela Gallo joined Cass in 2016 as a Marie Curie Research Fellow at the Centre for Banking Research. The winning project is on Shadow Banking. She also holds a position as senior lecturer at University of Salerno (Italy). Angela's research interests are in the areas of banking, risk management and corporate governance. Her research has been published in international peer-reviewed journals. Angela has taught at University of Salerno, University of Naples "Federico II" and Cass Business School. She also regularly teaches professional courses at Italian Banking Association (ABI) and for banks.

### **Dr Francesc Rodriguez Tous**

Francesc is a lecturer in banking, BSc Banking and International Finance and BSc Finance course director, and a member of the Centre for Banking Research at Cass Business School. He received his PhD in Economics, Finance and Management from the Universitat Pompeu Fabra, in Barcelona. He has previously worked at the Bank of England, Deutsche Bundesbank, and Banco de España. His research has a strong focus on banking regulation, systemic risk, and monetary policy.

<http://www.cass.city.ac.uk/faculties-and-research/centres/cbr>

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<b>MAYOR &amp; CABINET</b>			
<b>Report Title</b>	Outstanding Scrutiny Items		
<b>Key Decision</b>	No		Item No.
<b>Ward</b>	n/a		
<b>Contributors</b>	Head of Business and Committee		
<b>Class</b>	Part 1	Date: 15 November 2017	

## 1. Purpose of Report

To report on items previously reported to the Mayor for response by directorates and to indicate the likely future reporting date.

## 2. Recommendation

That the reporting date of the items shown in the table below be noted.

Report Title	Responding Author	Date Considered by Mayor & Cabinet	Scheduled Reporting Date	Slippage since last report
Response to Safer Stronger Communities Select Committee on Demographic Change	ED Resources & Regeneration	September 13 2017	November 15 2017	No
Response to Sustainable Development Select Committee – Fire Safety in Tall Buildings	ED Resources & Regeneration and ED Customer	September 13 2017	November 15 2017	No
Response to Sustainable Development Select Committee – Cycling Strategy	ED Resources & Regeneration	September 13 2017	December 6 2017	Yes

Response to Sustainable Development Select Committee – Catford Regeneration	ED Resources & Regeneration	October 4 2017	December 6 2017	No
Response to Public Account Select Committee – Adult Social Care	ED Community	October 25 2017	January 10 2018	No
Response to Public Account Select Committee – Budget Communication	ED Resources & Regeneration	October 25 2017	January 10 2018	No
Response to Public Account Select Committee – Income Generation	ED Resources & Regeneration	October 25 2017	January 10 2018	No

### **BACKGROUND PAPERS and AUTHOR**

Mayor & Cabinet minutes September 13 2017 October 4 and 25 2017 available from Kevin Flaherty 0208 3149327.

<http://councilmeetings.lewisham.gov.uk/ieListMeetings.aspx?CId=139&Year=0>

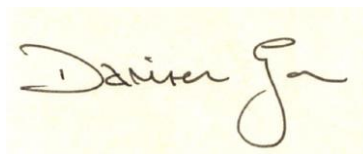


<b>Chief Officer Confirmation of Report Submission</b>	
<b>Cabinet Member Confirmation of Briefing</b>	
<b>Report for: Mayor</b>	<input type="checkbox"/>
<b>Mayor and Cabinet</b>	<input checked="" type="checkbox"/>
<b>Mayor and Cabinet (Contracts)</b>	<input type="checkbox"/>
<b>Executive Director</b>	<input type="checkbox"/>
<b>Information</b> <input type="checkbox"/> <b>Part 1</b> <input checked="" type="checkbox"/> <b>Part 2</b> <input type="checkbox"/> <b>Key Decision</b> <input type="checkbox"/>	

<b>Date of Meeting</b>	15 <sup>th</sup> November 2017	
<b>Title of Report</b>	New Homes Programme Update	
<b>Originator of Report</b>	Jeff Endean	<b>Ext. 46213</b>

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
<b>Financial Comments from Exec Director for Resources</b>	X	
<b>Legal Comments from the Head of Law</b>	X	
<b>Crime &amp; Disorder Implications</b>		X
<b>Environmental Implications</b>		X
<b>Equality Implications/Impact Assessment (as appropriate)</b>	X	
<b>Confirmed Adherence to Budget &amp; Policy Framework</b>	X	
<b>Risk Assessment Comments (as appropriate)</b>		
<b>Reason for Urgency (as appropriate)</b>		



Signed: \_\_\_\_\_ Executive Member

Date: \_\_\_\_\_ 07/11/2017 \_\_\_\_\_



Signed: \_\_\_\_\_ Director/Head of Service

Date \_\_\_\_\_ 07/11/2017 \_\_\_\_\_

**Control Record by Committee Support**

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	

To be Referred to Full Council	
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<b>Mayor and Cabinet</b>			
<b>Title</b>	New Homes Programme Update		
<b>Key decision</b>	Yes	<b>Item no</b>	
<b>Wards</b>	All wards		
<b>Contributors</b>	Executive Director for Customer Services, Executive Director for Regeneration and resources, Head of Law		
<b>Class</b>	Part 1	November 15 2017	

## **1 Purpose of report**

- 1.1 This report provides an update on progress in delivering the Council's new homes programme, New Homes, Better Places. Good progress continues to be made - in the past month three new developments, of 81 homes in total of which 53 are Council homes, have been submitted for planning consideration. In total 323 of the 500 homes targeted by the programme are either complete, on-site or are progressing through the planning process.
- 1.2 This report sets out details of a proposed development of a garage site at Algernon Road in Ladywell, including the results of an initial consultation on the design development for the scheme. The report recommends that the Mayor agrees to Lewisham Homes submitting a planning application to deliver five new Council homes on the site, comprised of 1x two-bed house and 4 x three-bed houses
- 1.3 Finally the report contains details of a successful early expression of interest in funding of £13m from the GLA's Innovation Fund. The Innovation Fund seeks to support new approaches to affordable housing delivery. Officers have been in dialogue with the GLA about securing an allocation for Lewisham to fund the construction of four of the projects, of 140 homes in total, that are contained within the 500 home programme set out above. This would be to enable the approach to construction that was developed for PLACE/Ladywell to be evolved as part of the mainstream delivery of new Council homes in Lewisham.

## **2 Summary**

- 2.1 In July 2012 the Council embarked on a programme to build new Council homes in response to a series of on-going housing policy and delivery challenges, most notably an enduring under-supply of new affordable homes available to the Council to meet housing demand.

- 2.2 A series of update reports has subsequently been considered by Mayor and Cabinet and Housing Select Committee outlining progress in meeting the target of starting 500 new Council homes for social rent in 2018.
- 2.3 87 new social homes have now been completed, a further 124 are on-site and being delivered. A further 112 homes have awaiting submission by a planning committee. This means that 323 homes are underway in some form, which is 65% of the 500 home target. In addition there are a further 12 projects on which design development is advancing and which have the capacity to provide around 183 new Council homes and which have the potential to be submitted for planning consideration by Spring 2018. The programme therefore contains a total of 506 homes which are expected to start during 2018. A full summary of the development programme is appended to this report as appendix A.
- 2.4 The report provides a summary of consultation activity to date on a scheme at Algernon Road, and recommends that Lewisham Homes finalises these plans and submits a planning application for the development.
- 2.5 Finally the report sets out details of negotiations between officers and the GLA to secure around £13m of grant funding to support the construction of 140 homes within the 500 home programme, and recommends that the Mayor agrees that officers may formally bid for this funding and that the authority to finalise the detailed terms should be delegated to the Executive Director of Resources and Regeneration, in consultation with the Head of Law.

### **3 Recommendations**

- 3.1 It is recommended that the Mayor:
- 3.2 Notes the progress update on the New Homes, Better Places Programme;
- 3.3 Notes the design development and consultation which has been carried out on the proposed re-development of the garages at Algernon Close, including the statutory Section 105 Consultation summarised at section 6.7
- 3.4 Having considered the responses to the statutory Section 105 consultation on the proposed re-development of the garages at Algernon Close, which are summarised in section 6.7 of this report, agrees that Lewisham Homes should proceed to submit a planning application to deliver five new Council homes on the site
- 3.5 Notes the success of the Councils Expression of Interest (EOI) to the GLA Innovation Fund, and current progress made towards finalising designs and overall programme costings for the four schemes
- 3.6 Authorises officers to bid for funding from the GLA Innovation Fund to deliver four of the projects within the 500 home programme using modern methods of construction in the same manner as at PLACE/Ladywell, at an estimated value of £14m, as set out at section 7 of this report.

- 3.7 Subject to the bid being successful, delegates authority for agreeing the terms of the grant agreements with the GLA to the Executive Director of Resources and Regeneration, in consultation with the Head of Law.

#### **4 Policy context**

- 4.1 The contents of this report are consistent with the Council's policy framework. It supports the achievements of the Sustainable Community Strategy policy objectives:

- Ambitious and achieving: where people are inspired and supported to fulfil their potential.
- Empowered and responsible: where people can be actively involved in their local area and contribute to tolerant, caring and supportive local communities.
- Healthy, active and enjoyable: where people can actively participate in maintaining and improving their health and well-being, supported by high quality health and care services, leisure, culture and recreational activities.

- 4.2 The proposed recommendations are also in line with the Council policy priorities:

- Strengthening the local economy – gaining resources to regenerate key localities, strengthen employment skills and promote public transport.
- Clean, green and liveable – improving environmental management, the cleanliness and care for roads and pavements and promoting a sustainable environment.

- 4.3 It will also help meet the Council's Housing Strategy 2015-2020 in which the Council commits to the following key objectives:

- Helping residents at times of severe and urgent housing need
- Building the homes our residents need
- Greater security and quality for private renters
- Promoting health and wellbeing by improving our residents' homes

## 5 Recent Programme Achievements

- 5.1 Good progress continues to be made in delivering the target of 500 new Council homes to start on site by the end of 2018. Over the past month three new developments, of 81 homes in total of which 53 are Council homes, have been submitted for planning consideration. In total 323 of the 500 homes targeted by the programme are either complete, on-site or are progressing through the planning process. This means that at this stage 65% of the target 500 homes has been achieved, and officers continue to pursue a range of other projects to deliver the remaining homes.
- 5.2 The table below sets out a summary of the new homes programme delivery, overall and in the past month, and Appendix One contains a summary of the overall programme.

Project Status	Number of new Council homes	Change in past month
Completed new homes	87	+1
Projects on-site	124	+19
Awaiting start	1	None
Awaiting planning consent	111	+53
Awaiting planning submission	183	-38
<b>Grand total</b>	<b>506</b>	<b>-7</b>

- 5.3 Among the schemes that has been submitted for planning consideration in the past month is the development of new self-build homes at Church Grove that is being led by the Rural Urban Synthesis Society (RUSS). RUSS is a volunteer-led Community Land Trust which was selected by the Council through a competitive process to re-develop the site for affordable housing. The Council is providing the land on a long-lease to enable the development
- 5.4 The project will provide 33 new sustainable, high quality, self-build homes on a vacant site. The homes will be designed and built by its future residents. All dwellings will be targeted to local housing need. The breakdown of units is below:
- 4 x one-bedroom flats for rent for under-occupiers
  - 1 x large four-bed house for social rent
  - 2 x three-bedroom shared flats.
  - 8 x one & 6 x two bedroom flats for shared equity
  - 5 x three-bedroom, 2 x four bedroom houses, 1 x 1-bedroom and 4 x 2-bedroom flats for shared ownership.

## 6 Algernon Road Garages, Ladywell Ward (5 new homes)

- 6.1 The proposal for this site is to deliver five new family Council homes, replacing the existing use of ten garages and associated hardstanding. The site is bounded by Embleton Road to the west and Algernon Road to the east. The site is next to two post-war blocks of flats of two and three storeys, each with a central stairwell.

- 6.2 The new homes will be a mix of 1x 2-bedroom and 4 x 3-bedroom houses. A plan of the site in question, and an image of the proposed development can be found at Appendices B-D. All units for be for social rent
- 6.3 Two consultation events have been held for local residents to see the proposals, at drop in sessions, and comment on them (22 March and 28 June 2017). All residents within the vicinity of the proposed site were sent letters inviting them to the event.
- 6.4 Feedback forms were provided at the drop-ins, with the intention that any written feedback given at the event by secure tenants would be considered for the purposes of the formal consultation along with other written representations received.
- 6.5 The main issues which have been raised by local residents through the consultation are the design of the block, overlooking and disruption during the construction phase. Officers consider that all of these issues can be adequately addressed by the design team and through the planning process.
- 6.6 A formal consultation, under S105 of the Housing Act 1985, was commenced on 18 September 2017. 144 secure tenants who live in the vicinity of the proposed development were sent a formal S105 letter.
- 6.7 The consultation period ran for 24 days from 18 September 2017. A summary of consultation responses can be found in the table below, with officer responses to those.

S105 consultation response	Officer response
<u>Response 1</u> Expressed concern about loss of garage	Officers will look to ensure those who currently rent garages are offered a suitable alternative.

- 6.8 Given that officers consider that the concerns raised during the consultation can be adequately addressed, and because the site has been shown to have the potential to provide five new Council homes including family sized homes, the Mayor is recommended to approve Lewisham Homes to submit a planning application for five new homes on this site.

## 7 The GLA Innovation Fund

- 7.1 The GLA Innovation Fund has been set up as part of the new Mayor of London’s approach to increasing the number of new affordable homes that are built in London. The role of the Innovation Fund specifically is to enable the development of new models of delivery, including community-led development of the type led by RUSS and discussed above, and utilising modern methods of construction of the type pioneered by the Council at PLACE/Ladywell.

- 7.2 Officers have been in close dialogue with the GLA about the potential to attract additional funding into the Council's delivery programmes, as the Council is bringing forward a range of delivery projects that including innovative models of the type supported by the Innovation Fund. These conversations have focussed on a range of options, and have led to in principle support, for instance, for the two community-led developments in the programme. If this is confirmed, the funding will be provided to the partners direct.
- 7.3 In particular though, the dialogue has focussed on whether GLA funding could be brought into the 500 home programme to support an expansion of the use of modern methods of construction of the type piloted at PLACE/Ladywell. In that project it was shown that by constructing homes in factory-controlled conditions it was possible to provide high quality homes quickly and in a financially viable manner.
- 7.4 The challenge for all housing providers now is to establish how this approach can start to contribute at a greater scale, above and beyond the pilot projects that the Council and some other organisations have delivered to date. To that it is proposed that a second wave of off-site manufactured sites is brought forward, to enable homes that are already planned for delivery within the 500 home programme to benefit from the additional speed and certainty on cost and delivery timetable that PLACE/Ladywell showed was possible.
- 7.5 All four of these developments have been designed with off-site manufacture in mind from the outset. Three are being developed in partnership with the consultant team that designed PLACE/Ladywell and the fourth has been designed by the architects working alongside Legal & General Homes, which has recently invested in a new factory for delivering off-site manufactured homes at scale.
- 7.6 The four projects are as follows:

Project	Location	Homes Delivered
Mayfield	Burnt Ash Hill, Lee Green Ward	47 Council homes
Kenton Court	Adamsrill Road, Bellingham Ward	25 Council homes
Home Park	Winchfield Road, Bellingham Ward	34 Council homes
Edward Street	Edward Street, Evelyn Ward	33 Homes for temporary accommodation

- 7.7 Following initial discussions and an expression of interest submitted by officers the GLA has provided in principle support to the programme. It has invited the Council now to finalise the four development designs and thereby fix the overall likely cost, and then to establish a fixed rate of grant funding. This is likely to be in the region of 35 per cent to 40 per cent of the total project costs, currently estimated at around £13m of investment into the Council's programme. The remainder of costs would then be covered through Council capital resources, subject to the usual and necessary approvals.



- 7.8 It is anticipated that construction works will start on site on the first of the projects in late summer 2018, with practical completion of all of them scheduled to take place by the end of 2019. At this stage however, these dates are indicative only, as planning consent has yet to be achieved and as officers are undertaking further work to establish designs, costs and the most appropriate procurement routes.
- 7.9 In line with the Council's Constitution, the Mayor is asked to agree that officers may formally bid for funding in line with the aims and terms set out above. The Mayor is also asked to agree that the authority for agreeing the detailed terms of the grant agreement with the GLA may be delegated to the Executive Director of Resources and Regeneration, in consultation with the Head of Law.
- 7.10 Despite the success of PLACE/Ladywell and other off-site manufactured projects across the UK, overall the construction market for this form of construction is in its infancy, but it is growing quickly and there is huge interest in how the value of modern technology can be captured to develop more homes, more quickly. For the Council, with its aim to maximise the number of new Council homes it builds, there is also an imperative to translate the cost savings new approaches such as this may offer, into lower cost housing for people in housing need.
- 7.11 To support officers in ensuring that a programme of this complexity, in a nascent market, can genuinely deliver value for money and manage risks, an advisory team has been appointed. This team is made up two organisations – Cast and Cogent – which have been instrumental in driving the development of this sector to date. For example the Chief Executive of Cast, Mark Farmer, wrote the Government's own review of the potential of new methods of construction, "*Modernise or Die*", in 2016.
- 7.12 The work that this advisory team will provide will enable officers to advise the Council on the most advantageous approach for utilising new technology to provide better, cheaper and quicker to build new Council homes. This work is likely to complete in early 2018 and will be reported back to Mayor & Cabinet accordingly. Its focus will include a review of the construction market, of off-site manufactured models, the potential "best fit" of those to the sites in question, and the ways in which the Council might use a procurement exercise of this scale to maximise the other benefits for the borough, especially in relation to jobs and skills.

## **8 Financial Implications**

- 8.1 The Council's current 30 year financial model for the Housing Revenue Account includes provision for up to 500 new units, for social rent purposes, at an average cost of £190k each (adjusted annually for inflation) over the first 10 years of the model.
- 8.2 The delivery of the HRA Social Units outlined in this report will be funded from this provision.

- 8.3 Expenditure related to the Precision Manufactured Housing (PMH) temporary accommodation units will be funded from the General Fund capital programme budget. A report will be presented to Mayor & Cabinet to seek approval for the required budget once more accurate costing has been developed and prior to entering into a final grant agreement with the GLA.
- 8.4 Mayor & Cabinet approval is required to bid for funding from the GLA Innovation Fund because the potential funding award exceeds £1 million.

## **9 Legal Implications**

- 9.1 The Council has a wide general power of competence under Section 1 of the Localism Act 2011 to do anything that individuals generally may do. The existence of the general power is not limited by the existence of any other power of the Council which (to any extent) overlaps the general power. The Council can therefore rely on this power to carry out housing development, to act in an “enabling” manner with other housing partners and to provide financial assistance to housing partners for the provision of new affordable housing. In accordance with General Consent A3.1.1 of The General Housing Consents 2013 the Council may dispose of dwelling houses on the open market at market value.
- 9.2 Some of the proposals set out in this report are at an early stage of development. Detailed specific legal implications will be set out in subsequent reports to Mayor & Cabinet/Mayor & Cabinet (Contracts) as appropriate. Section 105 of the Housing Act 1985 provides that the Council must consult with all secure tenants who are likely to be substantially affected by a matter of Housing Management. Section 105 specifies that a matter of Housing Management would include a new programme of maintenance, improvement or demolition or a matter which affects services or amenities provided to secure tenants and that such consultation must inform secure tenants of the proposals and provide them with an opportunity to make their views known to the Council within a specified period. Section 105 further specifies that before making any decisions on the matter the Council must consider any representations from secure tenants arising from the consultation. Such consultation must therefore be up to date and relate to the development proposals in question.
- 9.3 In accordance with the Mayoral Scheme of Delegation, approval of any application for external funding exceeding £1 million is reserved to the Mayor. At this stage, the Council is simply submitting a bid. This report recommends that authority is delegated to the Executive Director for Resources and Regeneration to agree the terms attached to any award of funding.
- 9.4 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 9.5 In summary, the Council must, in the exercise of its functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

9.6 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed at 9.3 above.

9.7 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.

9.8 1The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

## **10 Crime and disorder implications**

10.1 There are no crime and disorder implications arising from this report.

## 11 Equalities implications

11.1 The provision of new social housing in the borough has a positive equalities impact. Households on the Council's Housing Register are more likely to have a protected characteristic that the wider population as access to the register is limited to those most in housing need.

## 12 Environmental implications

12.1 There are no environmental implications arising from this report.

### Background Documents and Report Originator

Title	Date	File Location	Contact Officer
New Homes, Better Places Programme Update	1 June 2016	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Phase 3 Update	14 January 2015	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	15 November 2015	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	1 June 2016	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	11 January 2017	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	22 March 2017	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	10 May 2017	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	28 June 2017	Available at this <a href="#">link</a>	Jeff Endean
New Homes, Better Places Programme Update	4 October 2017	Available at this <a href="#">link</a>	Jeff Endean

If you have any queries relating to this report please contact Jeff Endean on 020 8314 6213.

Appendix A – Programme Update

Project	Lead Partner	New Homes			Next decision/stage	Target Planning Dates		Target Start on Site	Target Completion Dates
		Total	Council	Other Affordable		Submission	Approval		
<b>Completed schemes</b>									
Mercator Road	L. Homes	6	6	0	Complete				
Marischal Road	Pocket Living	26	0	26	Complete				
Slaithwaite Community Room	L. Homes	1	1	0	Complete				
Forman House	L. Homes	2	2	0	Complete				
Angus Street	L. Homes	1	1	0	Complete				
Dacre Park South - Phase 1	L. Homes	7	7	0	Complete				
PLACE/Ladywell	LBL	24	0	24	Complete				
Hamilton Lodge	LBL	21	0	21	Complete				
Hazelhurst Court	Phoenix	60	60	0	Complete				
Wood Vale	L. Homes	17	9	0	Complete				
Grebe Street	LBL	1	1	0	Complete				
<b>SUBTOTAL</b>		<b>166</b>	<b>87</b>	<b>71</b>					
<b>Schemes on site</b>									
Honor Oak Housing Office	L. Homes	5	5	0	On Site				Dec-17
Dacre Park South - Phase 2	L. Homes	18	18	0	On Site				Jan-18
Forster House	Phoenix	22	22	0	On Site				Jan-18
Woodbank	Phoenix	4	4	0	On Site				Mar-18
Longfield Crescent	L. Homes	27	27	0	On Site				Jul-18
Dacre Park North	L.Homes	5	5	0	On Site				Sep-18
Campshill Road	One Housing	53	34	19	On Site				Feb-19
93-95 Rushey Green (purchase)	LBL	9	9	0	On Site				Jan-18
<i>On-site subtotal</i>		<i>143</i>	<i>124</i>	<i>19</i>					
<b>CUMULATIVE SUBTOTAL</b>		<b>309</b>	<b>211</b>	<b>90</b>					

Project	Lead Partner	New Homes			Next decision/stage	Target Planning Dates		Target Start on Site	Target Completion Dates
		Total	Council	Other Affordable		Submission	Approval		
<b>Schemes awaiting start on site</b>									
Rawlinson House	L. Homes	1	1	0	Planning decision			Jan-18	May-18
<i>Awaiting start subtotal</i>		<i>1</i>	<i>1</i>	<i>0</i>					
<b>CUMULATIVE SUBTOTAL</b>		<b>310</b>	<b>212</b>	<b>90</b>					
<b>Schemes awaiting planning consent</b>									
Marnock Road	L. Homes	6	6	0	Planning decision		Oct-17	Jan-18	May-19
Stanstead Road	Birnbeck HA	4	4	0	Planning decision		Dec-17	Jan-19	Jan-19
Hawke Tower	L. Homes	1	1	0	Planning decision		Dec-17	Mar-18	Aug-18
Kenton Court	L. Homes	25	25	0	Planning decision		Jan-18	May-18	May-20
Mayfield	L. Homes	47	47	0	Planning decision		Jan-18	May-18	May-19
Somerville Estate Phase 1	L. Homes	23	23	0	Planning decision		Jan-18	May-18	Nov-19
Church Grove	RUSS	33	5	28	Planning decision		Jan-18	Mar-18	Mar-21
<i>Awaiting planning subtotal</i>		<i>139</i>	<i>111</i>	<i>28</i>					
<b>CUMULATIVE SUBTOTAL</b>		<b>449</b>	<b>323</b>	<b>118</b>					

Project	Lead Partner	New Homes			Next decision/stage	Target Planning Dates		Target Start on Site	Target Completion Dates
		Total	Council	Other Affordable		Submission	Approval		
<b>Schemes awaiting planning submission</b>									
Endwell Road	L. Homes	9	9	0	Planning submission	Nov-17	Feb-18	Mar-18	Sep-19
Pepys Housing Office	L. Homes	5	5	0	Planning submission	Nov-17	Feb-18	Mar-18	Jun-19
Algernon Road	L. Homes	5	5	0	M&C decision (15 Nov)	Nov-17	Feb-17	May-18	Aug-19
Forest Estate	L. Homes	17	17	0	M&C decision (6 Dec)	Dec-17	Mar-18	Jun-18	Jun-20
Edward Street	LBL	32	32	0	M&C decision (6 Dec)	Dec-17	Mar-18	May-18	May-19
Grace Path	L. Homes	6	6	0	Planning submission	Jan-18	Apr-18	May-18	Aug-19
Silverdale Hall	L. Homes	7	7	0	Planning submission	Jan-18	Apr-18	May-18	Aug-19
High Level Drive	L. Homes	18	18	0	M&C decision (10 Jan)	Jan-18	Apr-18	Jul-18	Jul-20
Home Park	L. Homes	36	36	0	M&C decision (10 Jan)	Jan-18	Apr-18	Jul-18	Jul-19
Bampton Estate	L. Homes	44	44	0	M&C decision (10 Jan)	Jan-18	Apr-18	Jul-18	Jul-20
Embleton Road	L. Homes	4	4	0	M&C decision (10 Jan)	Jan-18	Apr-18	Jul-18	Oct-19
Brasted Close	L. Citizens	11	0	11	Planning submission	Mar-18	Jun-18	Sep-18	Mar-20
<i>Awaiting submission subtotal</i>		<b>194</b>	<b>183</b>	<b>11</b>					
<b>GRAND TOTAL</b>		<b>643</b>	<b>506</b>	<b>129</b>					

Appendix B– Algernon Road Site Plan





Appendix C – Algernon Road Indicative Images of Development



# Appendix D - Algernon Road Elevations



**Chief Officer Confirmation of Report Submission**  
**Cabinet Member Confirmation of Briefing**

Report for: Mayor   
 Mayor and Cabinet   
 Mayor and Cabinet (Contracts)   
 Executive Director   
 Information  Part 1  Part 2  Key Decision

Date of Meeting	15 <sup>TH</sup> November 2017	
Title of Report	Cutting energy costs through new local energy supply models	
Originator of Report	Martin O'Brien	Ext. 46605

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources	√	
Legal Comments from the Head of Law	√	
Crime & Disorder Implications		
Environmental Implications	√	
Equality Implications/Impact Assessment (as appropriate)	√	
Confirmed Adherence to Budget & Policy Framework		
Risk Assessment Comments (as appropriate)		
Reason for Urgency (as appropriate)		



Signed: \_\_\_\_\_ Executive Member

Date: 6/11/17



Signed: \_\_\_\_\_ Director/Head of Service

Date: 7-11-17

**Control Record by Committee Support**

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	

<b>MAYOR AND CABINET</b>			
<b>Report Title</b>	Cutting energy costs through new local energy supply models		
<b>Key Decision</b>	Yes		
<b>Ward</b>	All		
<b>Contributors</b>	Executive Director for Resources and Regeneration		
<b>Class</b>	Open	Date:	15 November 2017

## 1. Purpose

- 1.1 The purpose of this report is to update the Mayor on an appraisal of options for helping cut residents' fuel bills through new local energy supply models. The report proposes next steps for the Council to take.

## 2. Recommendations

- 2.1 It is recommended that the Mayor:
- Agrees that officers maintain a watching brief on new London energy supply models working with other boroughs and the Greater London Authority.
  - Agrees the proposal to pilot a new community energy fund subject to any further approvals required (4.13-4.16)
  - Confirms the Council's support, in principle, for a heat network in the borough making use of waste heat from South East London Community Energy subject to a further report being presented to the Mayor (4.12)
  - Agrees that officers develop options for future work to provide practical support to vulnerable households and to submit these to Lewisham's Health and Wellbeing Board (4.9-4.10).

## 3. Policy Context

- 3.1 The Government's Fuel Poverty Strategy published in 2015 sets targets for minimum energy standards for fuel poor households with milestones identified for 2020, 2025 and 2030.
- 3.2 In October 2017 the Government published its Clean Growth Plan confirming ongoing subsidies through the obligation on energy suppliers to fund domestic retrofit works up to 2028. Alongside the Clean Growth Plan the Government also published draft legislation to cap energy bills.
- 3.3 The Community Energy Strategy, 2014 sets out the Government's strategy for encouraging the wider deployment of energy at a local level, including by community groups or local authorities.
- 3.4 *Shaping our future*, Lewisham's Sustainable Community Strategy for 2008-2020, sets out a vision for Lewisham: 'Together, we will make Lewisham the best place in London to live, work and learn'. *Shaping our future* includes the following priority

outcomes relevant to flood risk: *‘Clean, green and liveable: where people live in high quality housing and can care for and enjoy their environment’*. This report is relevant to a number of the Council’s corporate priorities but in particular “**clean, green and liveable** – improving environmental management, the cleanliness and care for roads and pavements and promoting a sustainable environment”.

- 3.5 The Home Energy Conservation Act (1995), as amended by 2012 guidance, sets a statutory obligation on local authorities to publish their plans to improve energy efficiency in housing in their local area. Authorities are required to produce reports every two years. Lewisham Council’s latest report was published in March 2017.
- 3.6 The Lewisham Poverty Commission was launched in February 2017 and brought together Lewisham councillors, local organisations and national experts to tackle poverty. The Commission’s new report includes 52 recommendations to:
- enable local people to access decent work
  - reduce child poverty
  - tackle the housing crisis.
- 3.7 The Greater London Authority has published a draft London Environment Strategy & Fuel Poverty Action Plan setting out its approach to making London a global leader in reducing greenhouse gas emissions and a zero carbon city by 2050.

#### **4. Background**

##### National

- 4.1 The Government estimates that 2.38m households in England are in fuel poverty. In Lewisham 12,282 households (10.5%) are estimated as being in fuel poverty. There were over 4,000 excess winter deaths in London in 2014/15, 140 deaths in Lewisham. A third of excess winter deaths are attributable to respiratory disease.
- 4.2 In September 2016 the Government’s committee on fuel poverty warned that, without urgent action, targets in the national Fuel Poverty Strategy would not be met.
- 4.3 OFGEM<sup>1</sup> has identified that vulnerable households (low income, the elderly and people with long-term health issues) are more likely to be on high-priced standard variable tariffs and spend a higher proportion of their income on energy. The impact of high energy prices is greater on poorer consumers, and the situation has got worse. OFGEM’s figures for 2015 are that the poorest 10 per cent of households spent an average of 9.7% of their income on energy, compared to 5.8% of their income in 2005.
- 4.4 In October 2017 the Government published a draft bill implementing their manifesto commitment to put a price cap on energy bills. OFGEM already operates a price cap on energy bills for the 4 million customers on pre-payment meters and in October 2017 launched a consultation for an additional price cap targeted at a further 1m vulnerable households not on pre-payment meters but who are on standard variable tariffs. These proposals are expected to be implemented by February 2018 and are estimated to save households an average of £120 a year for dual fuel customers. The Government’s draft bill seeks to extend the cap to all customers of large-scale suppliers on standard variable tariffs.

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<sup>1</sup> <https://www.ofgem.gov.uk/data-portal/energy-spend-percentage-total-household-expenditure-uk>

## Regional

- 4.5 The Mayor of London's draft Environment Strategy sets out proposals for carbon reduction and fuel poverty under an umbrella of *Energy for Londoners*. In relation to energy supply the Mayor of London is proposing to tender with an existing supplier for a London-branded offer primarily focussed on offering fair tariffs to fuel poor households. The rationale for opting for a 'white label' option is to manage risk and allow proposals to be brought forward more quickly. It is however unlikely that this will have been procured and implemented before the end of 2018.
- 4.6 In October 2017 Islington Council launched its own 'white label' offer for energy supply, Angelic Energy, having appointed Robin Hood Energy as a supplier.

## Local

- 4.7 The Mayor's Annual Report in March 2017 included the following: *"One way we may be able to help our residents is through cutting the cost of energy. There are some innovative schemes being developed which may make it easier to change to more economical providers but also deliver some wider benefits for the Borough. We have a very good track record as a Council in relation to energy and there are some great local schemes like South East London Community Energy. Over the next few months I want us to take a good look at whether we can do something to build on this."*
- 4.8 There are a range of ways in which the Council can help residents cut the cost of energy. This includes:
- Establishing a new local energy supply company (see section 5 below)
  - Advice and practical support for households at risk of fuel poverty (4.9)
  - Bringing energy company obligation funding (4.11)
  - Enabling heat networks using waste energy to offer low carbon and potentially low cost energy (4.12)
  - Promoting local community energy solutions (4.13).

## Advice and practical support

- 4.9 Warm Homes Healthy People has run in Lewisham since 2011/12 assisting over 2,000 homes in that time. The visits offer:
- practical advice on how to stay warm in the home
  - access to the £140 warm homes discount
  - assistance with debt on energy bills
  - advice on switching tariff
  - draught-proofing and other energy saving measures
  - a free winter warming pack (blanket, gloves, mug, thermometer card)
  - referrals on to other sources of help
- 4.10 Lewisham Public Health funding for the project ended in 2016, but officers have so far maintained delivery by securing two separate one-off funding routes. At the end of September budget exists for a further 110 visits. After that Warm Homes Healthy People is likely to end unless an alternative source of support can be found.

## Energy company obligation

- 4.11 Lewisham Council is currently working with South East London Community Energy (SELCE) on a project to target and engage with households that can benefit from the

current energy company obligation. The project makes it easier for energy suppliers to deliver the targets they have been set by Government to fund heating and insulation works for vulnerable households. Because of this the project generates a finder's fee for SELCE for qualifying households paid through the energy supplier funding with the intention that this creates a sustainable locally based resource. This innovative partnership established in Lewisham is a model that has potential for other boroughs and officers are working with other south London boroughs to roll the initiative out to other locations.

#### Heat networks

- 4.12 The South East London Combined Heat and Power plant run by Veolia in Lewisham has potential for up to 18MW of heat that could be supplied to local homes and businesses through a heat network. Installing the infrastructure for a heat network involves significant upfront investment and in an urban environment there are a range of constraints that add risk to any potential route. Lewisham Council has completed feasibility studies funded through the Government's Heat Network Development Unit into routes in New Cross and to development sites in the north of the borough showing significant potential for a commercially viable network that could deliver social, environmental and financial benefits to the borough. Officers are working with Veolia and with the Greater London Authority to develop this further.

#### Community energy fund

- 4.13 Tackling fuel poverty needs to be based on bringing together all available resources to connect with and provide support to vulnerable households. This is particularly true across the public sector and in relation to organisations working in the community and voluntary sectors. A community energy fund could be a way of supporting and extending these partnerships for the borough.
- 4.14 The Council delivered a grant funded project under the Green Deal Communities Fund ending in 2014/15. One of the outputs from the project was the creation of a loan fund to help small businesses access home retrofit supply chains. The loan fund has now completed and it is proposed that the £105,000 funding that is being returned to the Council is redeployed to pilot a community energy fund used to support local community and voluntary groups.
- 4.15 A community energy fund could be used to support a wide range of activity such as:
- Switching and practical advice
  - Collective purchasing of materials to reduce unit costs
  - Support for community share offers
  - Renewables
  - Lead generation
- 4.16 If agreed by the Mayor the details of the scheme will be developed in consultation with relevant service teams with a view to launching a Community energy fund for Lewisham in 2018, subject to any further internal approvals required. The project will be developed to maximise external resources that can be brought into the borough including the new Mayor of London's community energy fund. If the pilot is successful this could be something supported longer term through the Council's Carbon Offset Fund.

## 5. Option appraisal

- 5.1 There are a variety of options for getting involved in the local energy market, with a range of emerging hybrids. In general terms they can be characterised within the following three categories:
1. Ownership of supply and generation
  2. Tariff/purchasing offers
  3. Micro-generation

### *Ownership of supply and generation*

- 5.2 This can involve the generation of energy directly or purchase of energy from generators and/or more widely through the wholesale energy market.
- 5.3 Some of the governance options relating to a heat network from SELCHP would fit with this model.

### *Tariff/purchasing offers*

- 5.4 Local authorities can enter into arrangements with a supplier to become 'white label' suppliers, in effect putting their branding on another organisation's product. Local authority branding can add credibility to an offer and encourage people who might not otherwise participate in the switching market.
- 5.5 This approach can also seek to aggregate local demand to try and get a better tariff – a geographically specific variant of collective switching.

### *Micro-generation*

- 5.6 Localised supply using renewable energy technologies. This can range from schemes that allow organisations to reduce their environmental impact and energy costs to models seeking to generate an income stream through the feed-in tariff or sale of energy at a reduced rate to the building occupant.

### *Assessment of options*

- 5.7 Annex A lists some of the local authorities involved in this work nationally and some of the previous work that the Council has been involved in.
- 5.8 An analysis of the strengths, weaknesses, opportunities and threats of each of the options is included at Annex B. In relation to setting up a new energy supply company there are significant start-up costs and it would require large amounts of officer time to develop and implement. Given this it is recommended that the Council look to work with the new supply offers that are now emerging in London if these are shown to offer vulnerable households lower bills.
- 5.9 In the meantime officers will continue to work on the range of current workstreams that are also helping residents reduce the cost of heating their homes. If agreed this will include:
- development of a new Community Energy Fund to be launched in 2018.
  - continued work with Veolia, the Greater London Authority and others to develop a heat network from SELCHP



- complete the current funded round of visits under Warm Homes Healthy People and bring forward new proposals to offer practical support for households vulnerable to the cold

## **6. Financial implications**

- 6.1 This report includes a recommendation that Mayor & Cabinet agrees the proposal to pilot a new community energy fund (4.13-4.16). This can be funded by £105,000 of grant monies provided under the Green Deal Communities Fund. This grant funding has previously been used to create a loan fund for small businesses to help them access home retrofit supply changes; the loan fund has now completed and is being returned to the Council.
- 6.2 This report also includes a recommendation that Mayor & Cabinet asks officers to develop options for future work to provide practical support to vulnerable households and to submit these to Lewisham's Health and Wellbeing Board (4.9-4.10). Presently, the Warm Homes Healthy People scheme has remaining budget for 110 home visits and has been funded through the British Gas Trust and the Better Care Fund.

## **7. Legal implications**

- 7.1 Under S1 of the Localism Act 2011 the Council has a general power of competence to do anything which an individual may do unless it is expressly prohibited.
- 7.2 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.3 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.
- 7.4 The duty continues to be a 'have regard duty' and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 7.5 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice".
- The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty.
  - The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions.

- The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value.
- The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

7.6 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

- i. The essential guide to the public sector equality duty
- ii. Meeting the equality duty in policy and decision-making
- iii. Engagement and the equality duty
- iv. Equality objectives and the equality duty
- v. Equality information and the equality duty

7.7 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

7.8 The Council remains under a duty under Section 3 Local Government Act 1999 to secure continuous improvement in the way its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. It must have regard to this duty in making decisions in respect of this report.

## **8. Crime and disorder implications**

8.1 There are no specific crime and disorder implications resulting from this report.

## **9. Equalities implications**

9.1 There are no specific equalities implications resulting from this report, but given the focus on fuel poverty it would be expected that work in this area will have a positive impact in reducing inequality.

## **10. Environmental implications**

10.1 There are no specific environmental implications resulting from this report, but there are strands of activity that will promote carbon reduction and energy efficiency and therefore contribute towards delivery of Lewisham's target for a 44% reduction in carbon emissions by 2020 against a 2005 baseline.

## **11. Conclusion**

11.1 It is recommended that the Mayor:

- Agrees that officers maintain a watching brief on new London energy supply models working with other boroughs and the Greater London Authority.

- Agrees the proposal to pilot a new community energy fund subject to any further approvals required (4.13-4.16)
- Confirms the Council's support, in principle, for a heat network in the borough making use of waste heat from South East London Community Energy subject to a further report being presented to the Mayor (4.12)
- Agrees that officers develop options for future work to provide practical support to vulnerable households and to submit these to Lewisham's Health and Wellbeing Board (4.9-4.10).

If there are any queries on this report please contact **Martin O'Brien, Climate Resilience Manager**, 020 8314 6605.

### **Background Documents**

- Lewisham's Home Energy Conservation Report 2017  
<https://www.lewisham.gov.uk/getinvolved/environment/energyefficiency/taking-the-lead/Documents/LewishamHECARReport2017.pdf>
- Lewisham's Statement of Intent for the Energy Company Obligation Flexible Eligibility  
<https://www.lewisham.gov.uk/getinvolved/environment/energyefficiency/taking-the-lead/Documents/LewishamStatementOfIntentV.2.pdf>
- Heat Network Feasibility Study New Cross  
<https://www.lewisham.gov.uk/inmyarea/regeneration/deptford/Pages/New-Cross-heat-network-feasibility-study.aspx>
- Heat Network Feasibility Study North Lewisham  
<https://www.lewisham.gov.uk/inmyarea/regeneration/deptford/Pages/North-Lewisham-heat-network-feasibility-study.aspx>

## Annex A

### Local authority engagement

The table below provides an overview of approaches being taken by other local authorities:

<b>OWNERSHIP OF SUPPLY &amp; GENERATION</b>	
<b>ORGANISATION</b>	<b>DETAILS</b>
Nottingham Council	Robin Hood Energy. Not-for-profit energy company also providing white label offers to others
Bristol City Council	Bristol Energy wholly owned by Bristol Council – buys energy on the wholesale market. People can pay for their energy in Bristol Pounds. All profits reinvested into the Council
Woking	Council buildings, offices and flats are powered by energy from Thameswey, a company owned by the local council
<b>TARIFF/PURCHASING OFFER</b>	
<b>ORGANISATION</b>	<b>DETAILS</b>
Cheshire East	Fairerpower for all - Ovo
Islington	Angelic Energy
Plymouth Council	Plymouth Energy - Ovo
Southend on Sea	Southend Energy
Leeds	White Rose Energy - Robin Hood Energy
Liverpool	The LECCy - Robin Hood Energy
<b>SCOPING</b>	
<b>ORGANISATION</b>	<b>DETAILS</b>
Greater London Authority	Energy for Londoners looked at 3 options: White Label Plus, with the option for PPA; Full Supply Licence – Mutual and Full Supply Licence – Consortium company. Proposing to set up a White Label offer. Developing their Licence Lite option to purchase energy from small-scale generators, with an initial plan for TfL to use this
Eastbourne & Lewes	Looking to set up a JV and going out to tender to try and find an organisation to partner with
Reading	Working with APSE Energy, has been in conversation with some southern local authorities to explore options
Leicester City Council & Leicestershire CC	Developing the white label option and have gone through a procurement process. Not yet named the organisation they are looking to work with
Isle of Wight	Developing a proposal with Reenergise. Would involve IoW putting in funding & anticipates a RoI within 5 years
Cornwall	Exploring the possibility of creating a Cornwall energy company which would improve fuel security and ensure the financial benefits of generating and providing renewable energy are retained locally.
Greater Manchester Combined Authority	Initial proposal to set up own company moved to an investigating a JV with another energy supplier with a PPA or white label agreement. Given increasingly competitive energy supply market, in October 2016 decided risks outweigh potential benefits

### Lewisham Council's activity to date

The table below sets out a range of activities carried out by Lewisham Council across the three broad areas of activity:

<b>OWNERSHIP OF SUPPLY &amp; GENERATION</b>	
<b>ACTIVITY</b>	<b>DETAILS</b>
Loampit Vale ESCo	Working with developers and the ESCo operator to set up a network in the Loampit Vale development and, through Planning, to extend the network to other sites in the area
Heat network feasibility studies	Drawing in funding from the GLA and BEIS to deliver a heat mapping study and feasibility studies for a network from SELCHP to Goldsmiths and development sites in the north of Lewisham
<b>TARIFF/PURCHASING OFFER</b>	
<b>ACTIVITY</b>	<b>DETAILS</b>
Tariff-switching	Advice has been given to residents on how to assess whether they are getting good value for money on their energy bills, along with support to switch to a different tariff
Collective purchasing	Lewisham supported 'The Big London Energy Switch' in which residents were invited to sign up to a collective switching scheme which aggregated demand to try and get a better tariff than they were previously on
<b>MICRO-GENERATION</b>	
<b>ACTIVITY</b>	<b>DETAILS</b>
'Rent-a-roof' scheme	A pilot project was delivered with Lewisham Homes which saw solar PV installed on Lewisham Homes properties. The residents get the benefit of the free electricity and the company who installed and maintains the PV at no cost to Lewisham Council or Lewisham Homes, gets the feed-in tariff
Corporate PV	Lewisham Council installed PV on a school and two community buildings to reduce running costs and derive an ongoing revenue stream from the feed-in tariff
Community energy	Lewisham Council worked in partnership with South East London Community Energy to support a community energy bond which paid for the installation of solar PV on schools in Lewisham and Greenwich whilst providing an RoI for investors

## Energy supply models SWOT Analysis

	OWNERSHIP OF GENERATION & SUPPLY	TARIFF/ PURCHASING OFFER	MICROGENERATION
<b>STRENGTHS</b>	Fits within general competency arrangements	Lower administrative burden	Low administrative burden
	Shows leadership and vision	Lower risk way to enter the energy marketplace	Flexible - both in terms of deployment of technology and also in terms of cost
	Generate revenue which can be reinvested in Council services	Low exposure to financial risk	Limited risk on any one install given the relatively low cost of the technology
	Able to put in place greater protections for vulnerable residents - e.g. in relation to pre-payment meters, disconnection processes etc	May be scope to offer advantageous tariffs to groups - e.g. people on pre-payment meters	Supports local security of supply by reducing demand on the national grid
	Ability to address carbon reduction aims by deploying renewable technologies	Potential to generate a small revenue stream from sign-ups	In some models, there can be an opportunity to provide energy at low/no cost to end-users which can help address other issues such as fuel poverty - e.g. rent-a-roof scheme
	Can cut costs for users with efficiency savings which can be passed on	Enables an organisation to make an offer to residents without the need for a subsidy or grant	Contributes towards delivery of the borough-wide carbon reduction target
	Can focus revenue back into other priorities – whether linked, such as addressing fuel poverty, or reinvested more broadly into supporting Council services		Helps reduce Council revenue costs if installed on own buildings
	Diversifies income base		
	Income generating potential which sits outside government funding		
	Keeps more money within the borough		
High degree of control over the tariff offer			

	Not currently a core Council function & would require new resources & skills which aren't necessarily available in-house	Feed-in tariff subject to political changes to date
	May be limited scope for reducing the carbon emissions from energy generated and supplied	Limited return on investment following the reduction in the feed-in tariff
	Political repercussions if tariffs rise or service quality falls, irrespective of the extent to which these issues can be controlled by the LA	Lack of investment in monitoring and maintenance can undermine outputs
	Uncertainty around consumer willingness to engage with new entrants	Potentially limited impact on carbon emissions
	Requires high-level leadership and ongoing support	Limited scope for developing a wider offer or moving into the generation & supply market without the need to start afresh
	Substantial start-up costs - Bristol Energy allocated £1,575m (of which £0.5m is contingency) and Nottingham Council invested c.£1m to set up Robin Hood Energy	Degression rates for feed-in tariff installs provides a logistical challenge and also impacts upon financial viability
	Contractual arrangements with the white label provider seem to require a minimum number of sign-ups and penalties can arise if they aren't met, however there is limited control over the tariff and service, which will significantly affect take-up and retention	
	High level of risk in all the stages of the process	Upfront costs which may not be recouped by referral fees - Islington estimates c.£100k set-up costs for their white label agreement with Robin Hood Energy. These costs are in addition to staff delivery costs
	High regulatory burden with a need to keep up to date with changes, albeit with scope to feed in to the process through responses to government and Ofgem consultations	Referral fees might not cover the revenue costs involved in delivering the obligations required under a white label agreement
	Administratively complex	Low degree of control over the tariff offer
	No in-house experience of setting up or running such a scheme	Small number of organisations currently interested in delivering white label offers may not lead to a strong offer being available
	May not contribute towards borough-wide carbon reduction targets	Unlikely to offer opportunities to deliver carbon reductions because there's little input into generation decisions

	Without some investment it's hard to understand if there's a market available and, if so, what scale this is at	Benefits in relation to fuel poverty aren't clear generally and specifically when compared to other tariffs which are available	
	Entry costs for new suppliers are high, with set up, marketing and operational costs that may not be recouped in the short-medium term		



Able to sell expertise/documentation to others on a consultancy basis - see e.g. Enfield	Extend the scope of the scheme to other local authority areas with the potential for increased income/economies of scale	Bulk purchasing power may help to reduce costs and could bring others in to the scheme
Disruptive to the current energy market	Income could be reinvested in other energy efficiency schemes	Falling costs of renewables could allow for increased deployment
Local training and employment - e.g. customer services; installation & maintenance; back office support	Direct marketing opportunities for other energy efficiency schemes can help to cut costs and increase take-up	Local training and employment in the installation & maintenance processes
Increasing development and density offers the scope & demand to install and manage more generation capacity	Could be allied to wider energy efficiency offers for the able-to-pay market - e.g. boiler servicing/replacements etc	Linking renewables into battery storage can increase the outputs
Can link in to wider development opportunities - e.g. Catford town centre, using this as an anchor load and larger energy centre	Gain a more detailed insight into the market and the business opportunities which can be used to inform development of other offers - including moving into the generation and supply side	Increased renewables can help to reduce air pollution - e.g. by supporting uptake of electric vehicles, avoided emissions from boilers
Grid resilience increases the attractiveness of the borough as place to develop new builds		Work with local community groups to deliver schemes
Many consumers are actively seeking more ethical providers - e.g. Ecotricity, Ovo etc - and this could provide a compelling offer		Scope for community bonds to fund installs and build interest within the borough for this
As with Nottingham Council's Robin Hood Energy - could look to offer white label schemes to other public sector bodies		Income from renewables could be reinvested in other energy efficiency schemes

Brexit increases costs & regulatory risks		
Subject to regulatory changes which can affect the operation & financial modelling of the project - e.g. changes to feed-in tariff		
High levels of political uncertainty and very different manifesto priorities from main parties at a time when there is a high potential for another election		
Energy generation & supply is an increasingly politicised area		
Better offers from other market providers can create a volatile customer base		Grid capacity may preclude connections for new renewables
Demand destruction from energy efficiency & renewables deployment can impact profitability		Climate change impacts could affect the renewable technologies
Reputational risks arising from service or tariff issues	Reputational risk in being aligned to a specific company	Efficiency of renewables is increasing rapidly and costs are falling. Waiting to install can lead to an ability to get more capacity for less financial outlay
Need to purchase energy on the wholesale market means the organisation is more subject to geo-political issues affecting pricing	May reduce wider market competition because the price is decided in partnership with the supplier & creates an illusion of choice but there is little to differentiate offers	
Increasingly complex market means there is a large amount of competition		
Committing to an energy mix which may lead to costs down the line - e.g. carbon price		

**Chief Officer Confirmation of Report Submission**  
**Cabinet Member Confirmation of Briefing**  
**Report for:** Mayor   
 Mayor and Cabinet   
 Mayor and Cabinet (Contracts)   
 Executive Director   
**Information**  **Part 1**  **Part 2**  **Key Decision**

<b>Date of Meeting</b>	15 <sup>TH</sup> November 2017	
<b>Title of Report</b>	Gypsy and Traveller Site(s) Local Plan Update	
<b>Originator of Report</b>	David Syme	Ext.47186

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources	√	
Legal Comments from the Head of Law	√	
Crime & Disorder Implications		
Environmental Implications		
Equality Implications/Impact Assessment (as appropriate)	√	
Confirmed Adherence to Budget & Policy Framework		
Risk Assessment Comments (as appropriate)		
Reason for Urgency (as appropriate)		

Signed:  Executive Member

Date: 7/11/17

Signed:  Director/Head of Service

Date: 7/11/17

**Control Record by Committee Support**

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	

<b>MAYOR AND CABINET</b>		
<b>Report Title</b>	Gypsy and Traveller Site(s) Local Plan Update	
<b>Key Decision</b>	Yes	Item No.
<b>Ward</b>	All	
<b>Contributors</b>	Executive Director for Resources and Regeneration and Executive Director for Customer Services	
<b>Class</b>	Part 1	Date: 15 November 2017

## **1. Summary**

- 1.1 At its meeting on 13 January 2016, Mayor and Cabinet approved consultation arrangements on the preparation of a Gypsy and Traveller Site(s) Local Plan (GTSLP) (including scope, search parameters, site selection criteria and timetable for identifying a site or sites). It also approved consultation on the associated Sustainability Appraisal Scoping Report.
- 1.2 Following consultation carried out by the Planning Service, at its meeting on 13 July 2016, Mayor and Cabinet approved the final search parameters and site selection criteria.
- 1.3. At its meeting on 7 September 2016, Mayor and Cabinet approved a GTSLP Potential Site(s) Report and Integrated Impact Assessment (IIA) for statutory public consultation. The Potential Site(s) Report identified two alternative potential residential traveller sites. These were: New Cross Social Club and adjoining land, Hornshay Street, SE15 and Land at Pool Court, SE6.
- 1.4. Public consultation was carried out on these alternative potential sites and the IIA during a six-week period between 17 October and 30 November 2016. It was intended to report back to Mayor and Cabinet in early 2017. However, consultation raised a number of important issues and it has taken longer than anticipated for officers to investigate these and further consider the overall appropriateness and deliverability of the two potential sites.

## **2. Purpose**

- 2.1 This report outlines the results of public consultation and the work that has been carried out by officers to investigate the main issues raised by those that made comments. It further considers the suitability and deliverability of the two potential sites before concluding that whilst both sites are potentially suitable when assessed against the Site Selection Criteria, officers consider that Pool Court is currently the preferred site.

- 2.2 It recommends that officers be instructed to further investigate a number of issues in relation to the Pool Court site and report back before a decision on which, if either, of the potential sites is chosen.

### **3. Recommendations**

- 3.1 The Mayor is recommended to:

a. Note the contents of the Consultation Statement (Appendix 1), including the main issues raised and officer response to them and the findings of the Integrated Impact Assessment (Appendix 2).

b. Note that officers consider that Pool Court is currently the preferred site.

c. Instruct officers to further investigate the following matters in relation to the potential Pool Court site and report back to Mayor and Cabinet: (i) the potential phased delivery of a traveller site, (ii) the incorporation of current public highway land in to a site and (ii) re-location assistance that could be offered to the existing scaffolding business.

d. Inform those that commented on the Potential Sites Consultation Report of these decisions.

### **4. Policy Context**

- 4.1 The contents of this report are consistent with the Council's policy framework. When the GTSLP is adopted it will become part of Lewisham's 'development plan' and will contribute to the implementation of each of the Council's ten priorities as follows:

- community leadership and empowerment
- young people's achievement and involvement
- clean, green and liveable
- safety, security and a visible presence
- strengthening the local economy
- decent homes for all
- protection of children
- caring for adults and older people
- active, healthy citizens
- inspiring efficiency, effectiveness and equity

- 4.2 The GTSLP will help give spatial expression to the Sustainable Community Strategy (Shaping Our Future) (SCS), which was prepared by the Local Strategic Partnership and adopted by the Council in May 2008. The Plan will also play a role in the implementation of the SCS vision '*Together we will make Lewisham the best place to live, work and learn*' and all of the six strategic priorities, which are:

- Ambitious and achieving – where people are inspired and supported to fulfil their potential
- Safer – where people feel safe and live free from crime, antisocial behaviour and abuse
- Empowered and responsible – where people are actively involved in their local area and contribute to supportive communities
- Clean, green and liveable – where people live in high quality housing and can care for their environment
- healthy, active and enjoyable – where people can actively participate in maintaining and improving their health and well-being
- Dynamic and prosperous – where people are part of vibrant communities and town centres, well connected to London and beyond

## **5. Background and summary of process**

- 5.1. The Housing and Planning Act (2016) includes a duty (under Section 8 of the 1985 Housing Act) for local authorities to consider the needs of “people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.”
- 5.2. Following the closure in 2009 of a former site in Thurston Road, next to Lewisham Station, Lewisham does not have any sites for the gypsy and traveller community. The Council did grant planning permission in 2008 for five pitches on a site in Church Grove, Ladywell. However, this permission was not acted upon, the planning permission has lapsed and this site is currently being developed for ‘bricks and mortar’ housing.
- 5.3. The Council adopted its Core Strategy in June 2011. Core Strategy Policy 2 identified criteria for selecting sites and envisaged that site(s) would be identified through a Sites Allocation DPD. However, it did not prove possible to include a site or sites in the Council’s Site Allocations Local Plan (SALP) when this was developed and adopted in June 2013. At the Examination in to the SALP, the Council confirmed its intention to bring forward a separate GTSLP by May 2014.
- 5.4. The Council began preparing a GTSLP in March 2013. However, other priorities meant that things did not progress as planned and preparation on the Local Plan halted. The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA), which was published in June 2015. This established the need for 6 pitches in the borough up to 2031. In August 2015, the Government published revised national guidance in the form of a new Planning Policy for Traveller Sites (PPTS). In order to ensure that the Council has a robust assessment of current and future need that takes account of the new definition, an update to the GTAA was commissioned. The Update (August 2016) identifies the continuing need for 6 pitches in the borough up to 2031. It also identifies additional need for ‘non-Lewisham’ households who

meet the new definition and which the Council should work with neighbouring boroughs to provide housing solutions.

## **6. Site Selection Process**

6.1. The process that the Council has undertaken can be summarised as follows:

Step 1 - Consult on proposed scope of Plan, Search Parameters, Site Selection Criteria & Sustainability Appraisal Scoping Report. In January 2016, the Mayor and Cabinet noted the proposed methodology and approved Selection Parameters and Site Selection Criteria for consultation. Consultation on draft Parameters and Criteria took place in March and April 2016. In July 2016, the Mayor and Cabinet approved the final Parameters and Criteria (taking account of the comments received).

Step 2 - Establish a list of appropriate Council assets. Officers in Strategic Housing and Asset Management identified a list of all Council assets (land and buildings) of 0.24ha in size and above based on 6 pitches with an average of 400sqm from Council ownership data by reviewing the Council's asset registers. In July 2016, the Mayor and Cabinet approved the final Parameters and Criteria (taking account of the comments received).

Step 3 - Identify a long-list of potential sites. Officers in Strategic Housing and Asset Management applied Site Selection Criterion 1 (Effective and efficient use of public assets) and this resulted in 5 potential Council-owned sites being identified. A private landowner also put its site forward for consideration during Stage 1 and this was included on the following long-list of 6 sites:

A - Land on Westbourne Drive SE23;

B - Land off Turnham Road, SE4;

C - New Cross Social Club & adjoining land, Hornshay Street, SE15;

D - Land at R/O 46-116 Baizdon Road SE3;

E - Land at Pool Court, SE6; and

F - Land at St Mildred's Road, Hither Green, SE12.

Step 4 - Identify a preferred site or sites. Planning officers applied Site Selection Criteria 2 to 10 to the long-list of sites resulting in the identification of two potential sites. In doing so, officers drew on the results of engagement with officers across the Council and the Clinical Commissioning Group and the Metropolitan Police, together with the findings of a highway and access feasibility study and flood risk studies and the Integrated Impact Assessment (combining Sustainability Appraisal and Equalities Analysis Assessment). This resulted in two potential sites being identified: New Cross Social Club and adjoining land and land at Pool Court.

Step 5 – Consult on a preferred site or sites. In September 2016, the Mayor and Cabinet approved a Potential Sites Report for consultation. Public

consultation on the two potential sites took place for 6 weeks in October and November 2016.

Step 6- Select a site. We are now at this stage in the process.

## 7. Consultation on potential sites and further investigation

7.1 The 6-week consultation on a Potential Sites Report and Integrated Impact Assessment took place in accordance with the relevant Regulations and the Council's Statement of Community Involvement. The Consultation Statement at Appendix 1 sets out in detail who was involved and how they were involved. In summary, this included getting back in touch with those people that commented during the earlier round of consultation, writing to a wide range of statutory and local organisations, putting up site notices, placing a public press notice in the News Shopper, putting an e-newsletter article in the Lewisham E-newsletter, preparing flyers and information sheets, an on-line and paper survey, holding two drop-in information sessions (one session close to each of the potential sites) and attending the Lewisham Traveller Forum. An overview of the extent of comments received is set out in the table below.

Engagement Activity		Participation Levels
Written Representations	Surveys	177 surveys (submitted online and via paper)
	Letter or email	48 letters and emails
In person engagement	Information Session & Focus Groups	2 x Information Session & Focus Groups were held.  One session for Pool Court based stakeholders was held at the Resident's Lounge, 37 - 61 Pool Court, Catford and attended by 10 participants (excluding Council employees).  The other session was held at Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate and attended by 19 participants (excluding Council employees).
	Traveller Forum Meeting	1 x Traveller Forum Meeting. Attended by 10 people and discussed the merits of both potential sites.
Petitions		3 x petitions were submitted with a total of 433 signatures. The 3 petitions were from: 1) Lovelinch Close. 315 signatures in opposition to New Cross site 2) Wheelshunters Club, 61 signatures in opposition to New Cross site. 3) Pool Court, 57 signatures in opposition to Pool Court site.

7.2 The Consultation Statement sets out the comments that were received and provides a detailed summary of the main issues, including officer responses to them. The main issues raised in response to the suitability of the potential sites and the draft development guidelines can be summarised as follows:



- Conformity with the approved Search Parameters - the potential Pool Court site is not in Council ownership or available 'now';
- The concentration of traveller sites in close proximity to the potential New Cross site – impact on services, 'ghettoisation' and cumulative effect upon the existing community;
- Ownership and deliverability of both potential sites – queries over the Council's ownership of the existing Multi Use Games Area (MUGA) at New Cross and the fact that Network Rail own a large part of the Pool Court site;
- Flooding risks at both potential sites – but particularly Pool Court, which is adjacent to the River Ravensbourne and has flooded in the past;
- Vehicular access at both potential sites – exacerbation of existing car parking problem and effect on emergency access to the Winslade Estate at the potential New Cross site and concerns about families living next to a road and emergency access at Pool Court;
- Loss of community facilities and housing at the potential New Cross site – loss of the MUGA that serves the Winslade Estate and loss of the Wheelshunters Social Club and residential flat without any replacement;
- Loss of an operational business and employment land at the potential Pool Court site – the existing scaffolding business would be displaced;
- Site size and capacity at Pool Court – concern about the shape and size of the potential site and ability to satisfactorily accommodate 6 pitches;
- Amenity concerns including noise at both potential sites and privacy and air quality at the potential New Cross site;
- The loss of ecology and habitat associated with the Site on Importance for Nature Conservation (SINC) at the Pool Court Site
- Deprivation and vulnerable communities – both sites are in deprived neighbourhoods with limited ability to accommodate travellers alongside existing vulnerable communities; and
- Impact on services in areas of deprivation (both sites) – additional demand on school places, doctor's surgeries and other services.

7.3 Consultation also raised a number of general issues not specifically related to site suitability or the proposed development guidelines. These include the following:

- Pitch allocation and management - concern that tenancy agreements and highway restrictions would not be enforced;
- Housing need and the needs assessment – preferential treatment being given to the traveller community (over the settled community) and inadequate consideration of the needs of travelling show people;
- Use of second site as a stopping place – one of the two sites should be used as a negotiated stopping place to assist the Council and the Police in stopping unauthorised encampments'.
- Insufficient Integrated Impact Assessment of the two potential sites; and
- Inadequate consultation.

7.4 Officers have carefully considered all comments received. They have also investigated the issues raised by undertaking additional consultation with a range of stakeholders and commissioned further studies. These include:

- Clarifying ownership issues in relation to the New Cross site and considering ways to regularise lease arrangements in relation to the Social Club;
- Commissioning a study in to a possible re-provision of smaller MUGA facility on land at Upnall House opposite the potential New Cross site (MUGA Re-provision Study) and holding discussions with Lewisham Homes;
- Holding discussions with Network Rail over acquiring the scaffolding site at Pool Court and raising with London and Quadrant Housing Association the possibility of acquiring a small area of existing public highway land at Pool Court;
- Seeking officer advice in relation to ecological impact at Pool Court.
- Commissioning further advice on flood risk issues and holding discussions with the Environment Agency in relation to both potential sites;
- Holding discussions with the London Fire Brigade in relation to both potential sites; and
- Commissioning a Masterplan Capacity Study for both potential sites to explore how they might be developed – both in accordance with the draft Site-specific Development Guidelines included in the Potential Sites Consultation Report and otherwise.

## **8. Further investigations in relation to the potential New Cross site**

- 8.1 Ownership & Deliverability. The freehold of the site is owned by the Council. The New Cross Social Working Men’s Club initially had a 60-year lease of the whole site (up to January 2034). The land now occupied by the MUGA was surrendered to the Council in 2006, to allow for the MUGA to be built. In 2010, the Council granted a one year to the Wheelshunters Club to stay in the Social Club building. However, the initial 60-year lease was not terminated and remains in place. The Council will need to regularise the lease situation by taking appropriate steps to terminate this lease. The Wheelshunters Club also remains in occupation of the Social Club building and this occupational arrangement would need to be terminated.
- 8.2 Site capacity. The draft Masterplan Capacity Study identifies an option with one vehicular access and an option with two vehicular access which both comply with the draft Site-specific Development Guidelines included in the Potential Sites Consultation Report. It also identifies an option with individual vehicular accesses from Hornshay Street and demonstrates that all of these options could accommodate at least six traveller pitches.
- 8.3 Flooding. Whilst in Flood Zone 3a, the site is protected by Thames flood defences. The site is theoretically at risk from Upstream Inundation of the Thames area in the scenario that lateral flood defences were removed and the Thames Barrier was closed. However, this is considered an unlikely scenario and in any event flood waters would take 6-12 hours to reach the site. Following further discussions with the Environment Agency, officers consider that there is a reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case is made and that adequate mitigation is incorporated, including flood warnings.

- 8.4 Fire Brigade Access. Lewisham Homes has introduced a gate to the southern end of Lovelinch Close and Sharrat Street as part of wider traffic management arrangements for the Estate designed to tackle anti-social behaviour. Vehicular access is now restricted to Rollins Street. Officers do not consider that the establishment of a traveller site on Hornshay Street would impact on these arrangements. In response to comments from some local people, officers have met with the London Fire Brigade to discuss issues and the Brigade has raised no particular concerns about this potential site.
- 8.5 Loss of Multi-Use Games Area. The existing MUGA was funded by the former New Cross Gate New Deal for Communities (NDC) and Marathon Trust and provided in 2006/07 following lobbying from local people. It comprises three separate games court areas (two kick-about areas and an informal basketball practice area) of approx. 720sqm, together with adjacent team areas, including two seats/shelters. The Potential Sites Consultation Report made clear that mitigation for the loss of the existing MUGA would be required by way of improvements to an existing facility or a replacement facility
- 8.6 The nearest other MUGAs are Brimington Park in Southwark on the south side of Old Kent Road (approx. 500m away). The draft MUGA Re-provision Study finds that the hardstanding area next to Upnall House (on the opposite side of Hornshay Street on the Winslade Estate) could accommodate one multi-use games area and a team area of approx.407sqm or a multi-use games area and separate informal basketball practice area of approx.323sqm. Whilst these options would mean that there would be a significant net loss of games space, it would enable replacement smaller facilities to be provided in the immediate area. Officers consider that facilitating the provision of a traveller site could represent special circumstances that justify such a loss.
- 8.7 The draft Masterplan Capacity Study suggests that it would be possible to provide 6 traveller pitches on the potential New Cross site whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement games area was also provided on the hardstanding next to Upnall House, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The Masterplan Capacity Study also identifies an option of providing 6 traveller pitches and a replacement multi-use games area on the site of the existing Social Club car park that could possibly retain all facilities and avoid any net loss in space.

## **9. Further investigations in relation to the potential Pool Court site**

- 9.1 Ownership & Deliverability. The Council owns the western part of the potential site, but not a sliver of land between the site and the Ravensbourne River. Network Rail owns this sliver of land and also the eastern part of the potential site, which is partly occupied by a scaffolding yard which has a lease expiring in 2020. Officers have held discussions with Network Rail over the possibility of purchasing its interest in this land. Network Rail is currently undertaking a portfolio sale of its commercial estate. However, in August 2017, in response

to a letter from the Mayor, Network Rail confirmed that owing to the requirement to produce a definitive portfolio of assets for the marketing and potential disposal of its commercial estate, it is no longer able to consider offers for the sale of the eastern part of the potential site. On this basis, the Council would need to discuss purchase with the new owner of the land. Officers understand that Network Rail is hoping to dispose of its commercial estate in June 2018.

- 9.2 Officers have also begun investigating the possibility of further rationalising the potential site so include part of the existing hammer head vehicular-turning area at the northern end of Pool Court. This part of Pool Court is not considered essential for servicing existing housing to the south and is often the subject of fly-tipping. The inclusion of all or some of this area within the potential site would improve its deliverability by marginally increasing its size, but more importantly by and improving its shape. This would require the closure of an area of public highway and the acquisition of the stopped-up highway land from London & Quadrant Housing Association.
- 9.3 Site capacity. Following clarification on ownership and minor adjustments, the overall potential site measures approx. 3,150sqm. The draft Masterplan Capacity Study demonstrates that the site could satisfactorily accommodate at least 6 traveller pitches in accordance with the draft Site-specific Development Guidelines in the Potential Sites Consultation Report (based on a single in-out vehicular access from Fordmill Road and pitches set back 8m from the River) and also taking account of subsequent advice from the Environment Agency to pull caravans away from the western boundary, as discussed below.
- 9.4 Flooding. The north-western part of site has flooded in the past (including in 1965) and the Environment Agency raised some significant concerns in response to the Potential Sites Consultation Report. The Agency has recently released up-to-date flood modelling for the Ravensbourne River for a 1:100-year flood event including 25 and 35% allowances for climate change. It should be noted that this does not take account of the proposed Beckenham Place Park Flood Alleviation Scheme. The modelling shows flood water running back from the River along the adjoining railway corridor and extending on to the western part of the potential site. Nevertheless, following discussion with the Agency, officers consider that there is the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case is made and that adequate mitigation is incorporated. The potential mitigation could include:
- Setting back development 8m from the existing river channel, investigating naturalising the southern bank (i.e. removing the concrete wall) and following guidance in the Council's River Corridor SPD;
  - Avoiding locating caravans, car parking and hard-standing areas in the high flood risk western part of the site;
  - Incorporating SUDS, including devices to control rates of discharge in to the River to green field run off rates;
  - Incorporating like-for-like level compensation works if ground levels need raising in some areas;

- Providing a safe and dry route to safety; and
- A Flood Evacuation Plan.

9.5 Fire Safety. In response to comments from the traveller community, officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade considered that a pedestrian-only exit on to Pool Court was desirable, but not essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met the all relevant guidance and best practice.

9.6 Ecology. Currently the whole site is within the Pool Court Linear Park Site of Importance for Nature Conservation (SINC) (Borough Importance), although the Re-Survey of SINCS (2016) proposes to exclude the scaffolding yard from the designation. Officers anticipate that the ecological value of the potential site is relatively limited due to the dominance of Japanese knotweed across the Council owned land. Officers consider that a carefully designed scheme that eradicates this knotweed, responds positively to the river, retains and/or mitigates the loss of existing valuable trees and safeguards any protected species would be acceptable. The Site-specific Development Guidance in the Potential Sites Consultation Report already calls for careful treatment next to the River, retention of trees where possible and careful lighting. This could be strengthened to include further biodiversity enhancements.

## **10. The Way Forward**

10.1 Public consultation raised a number of important issues in relation to both potential sites. Officers have carefully considered all comments and responded to the main issues raised (Consultation Statement at Appendix 1).

10.2 Officers have also investigated a number of issues raised by undertaking additional consultation with a number of stakeholders and commissioning further studies – as outlined above. It should be noted that there has been no consultation with local residents, businesses or (in relation to the potential New Cross site) the users of the Social Club or MUGA in relation to the further investigations that have taken place in relation to both sites. However, officers are intending to re consult local people and all other relevant stakeholders on any revised proposals for either site, before either of these potential sites is chosen to be allocated as a residential traveller site by way of the Gypsy and Traveller Site(s) Local Plan. In the meantime, it is recommended that all of those that commented on the Potential Sites Consultation Report are informed of the Mayor and Cabinet’s decision.

10.3 The Integrated Impact Assessment (IIA) has been updated to reflect changes since August 2016 and the results of consultation, including comments on the IIA itself. The latest IIA (October 2017) (Appendix 2) assesses the two potential sites against 16 identified objectives. In summary, the IIA finds that the provision of gypsy and traveller pitches at New Cross Social Club site could have a detrimental effect on health, social inclusion and accessibility to community infrastructure through the loss of a social club and games area

space. It also finds that the provision of gypsy and traveller pitches at Pool Court could have a negative effect on landscape, biodiversity, flora and fauna through the loss of open space.

- 10.4 Taking account of the above and all other material planning considerations, officers have re-assessed the relative merits of the two sites against approved Site Selection Criteria 2 to 10 (both sites were deemed to have met Criterion 1, effective and efficient use of public land). The updated Site Selection Background Paper (October 2017) uses a selection matrix so that each relevant criterion for each site could be given a qualitative score (1 – Excellent, 2- Good, 3 – Average, 4 – Poor or 5 - Very poor). Officers consider that the overall scores for the potential sites remain ‘2-Good’ for New Cross and ‘potentially 2-Good’ for Pool Court. This being the case, officers consider that both potential sites could be suitable for a residential traveller site.
- 10.5 Notwithstanding the current difficulties in acquiring the sliver of land next to the Ravensbourne River and eastern part of the site from Network Rail, officers consider that Pool Court is currently the preferred potential site for the following reasons:
- It is preferred by the Lewisham traveller community;
  - It is more self-contained, without being isolated from the wider community;
  - It is better suited to relatively low-density housing (having a suburban character and lower public transport accessibility);
  - It is outside Lewisham’s Regeneration and Growth Area and the London Plan Lewisham, Catford and New Cross Opportunity Area where bricks and mortar housing and employment growth is to be focused; and
  - It would not result in the loss or displacement of existing community facilities or housing.
- 10.6 It is therefore recommended that officers be instructed to further investigate the suitability and deliverability of potential Pool Court site, including the issues outlined below, before reporting back to Mayor and Cabinet with a definitive way forward:
- 10.7 Phased Delivery. The Potential Sites Consultation Report (5.7) notes that for practical and financial reasons, the Council expects to deliver all of the 6 or more pitches on a chosen site in one go. However, given the current situation with Network Rail, officers consider that it would be sensible to investigate whether a Pool Court site could be delivered in two phases, with at least 3 pitches on the Council-owned land delivered up to 2021 and at least 3 further pitches being developed on land currently owned by Network Rail between 2021 and 2031. This would involve vehicular access to the western Council-owned land from Pool Court during a first phase of delivery.
- 10.8 Incorporation of Highway Land. Whilst not essential, the inclusion of all or part of the existing hammer-head turning area at the northern end of Pool Court in to the potential site would help deliverability and may also help reduce fly-tipping. Officers should investigate whether all or part of this part of the

highway could be stopped-up as public highway and have further discussions with London and Quadrant Housing Association about purchase of any stopped-up highway land.

- 10.9 Re-location assistance. Identify what assistance the Council could offer to RHS Scaffolding to help it re-locate to an alternative suitable site.

## **11. Financial Implications**

- 11.1 There are no direct financial implications arising from this report. The consultation has been delivered from within the existing Planning Service budget.

## **12. Legal Implications**

- 12.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the main steps in the procedure for the production and adoption of planning documents, as explained in the report.
- 12.2 Following completion of the consultation on the Council's Preferred Site(s) Report which forms part of the process in creating a new Gypsy and Traveller Local Plan, this report requests that officers be instructed to further investigate a number of issues in relation to the Pool Court site to be reported back to Mayor & Cabinet before a decision on which, if either, of the potential sites is chosen.
- 12.3 The Equality Act 2010 (the Act) introduced a new public-sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.
- 12.4 The duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 12.5 The Equality and Human Rights Commission provides Technical Guidance on the Public-Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities

should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

12.6 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public-sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

12.7 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

### **13. Crime and Disorder Implications**

13.1 There are no direct implications relating to crime and disorder issues.

### **14. Equalities Implications**

14.1 The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010. The proposals set out in this report accord with the Council's Comprehensive Equalities Scheme; particularly as they relating to: 'increasing participation and engagement'.

14.2 The Integrated Impact Assessment (updated October 2017) provides a report of the Sustainability Appraisal, Strategic Environmental Assessment and Equalities Analysis Assessment of the Lewisham Gypsy and Traveller Site(s) Local Plan. This assessed both potential sites and was consulted on alongside the Potential Sites Consultation Report.

14.3 The purpose of the Integrated Impact Assessment is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Lewisham Gypsy and Traveller Site(s) Local Plan.

### **15. Environmental Implications**

15.1 There are no direct environmental impacts arising from this report.



## 16. Conclusion

16.1 The Mayor and Cabinet is recommended to:

a. Note the contents of the Consultation Statement (Appendix 1), including the main issues raised and officer response to them, and the findings of the Integrated Impact Assessment (Appendix 2).

b. Instruct officers to further investigate the following matters in relation to the potential Pool Court site and report back to Mayor and Cabinet: (i) the potential phased delivery of a traveller site, (ii) the incorporation of current public highway land in to a site and (ii) re-location assistance that could be offered to the existing scaffolding business.

c. Inform those that commented on the Potential Sites Consultation Report of these decisions.

## 17. Background documents and originator

Short Title Document	Date	File Location	File Reference	Contact Officer	Exempt
Planning & Compulsory Purchase Act 2004	2004	Laurence House	Planning Policy	David Syme	No
Localism Act 2011	2011	Laurence House	Planning Policy	David Syme	No
National Planning Policy Framework (NPPF) 2012	2012	Laurence House	Planning Policy	David Syme	No
Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)	2012	Laurence House	Planning Policy	David Syme	No
Planning policy for traveller sites 2015	2015	Laurence House	Planning Policy	David Syme	No
Lewisham Gypsy and Traveller Accommodation Assessment (as updated)	August 2016	Laurence House	Planning Policy	David Syme	No
Highway and Access Feasibility Report (as	October 2016	Laurence House	Planning Policy	David Syme	No

updated)					
Flood Smart Pro and Sequential Testing Report (as updated)	October 2016	Laurence House	Planning Policy	David Syme	No
Draft Winslade Multi-Use Games Area Re-Provision Study	May 2017	Laurence House	Planning Policy	David Syme	No
Draft Masterplan and Capacity Study	June 2017	Laurence House	Planning Policy	David Syme	No
Site Selection Background Paper Update	October 2017	Laurence House	Planning Policy	David Syme	No

If you have any queries on this report, please contact David Syme, Strategic Planning Manager, 3<sup>rd</sup> floor Laurence House, 1 Catford Road, Catford SE6 4RU – telephone 020 8314 7186.

# **Gypsy and Traveller Site(s) Local Plan**

## **Regulation 18, Stage 2 Consultation Statement October 2017**

## Contents

Executive Summary .....	3
1. Introduction .....	5
2. Who we involved .....	7
3. How we involved the community.....	8
4. Feedback Levels and Summary of Main Issues .....	10
5. Further Investigations .....	23
6. Conclusion and Next Steps.....	24

### Appendices

Appendix 1: Specific Consultees	
Appendix 2: General and Other Consultees	
Appendix 3: Notification of Public Consultation	
Appendix 4: Press Notice: News Shopper	
Appendix 5: List of organisations and individuals that responded	
Appendix 6: Representations received in relation to the potential New Cross site	
Appendix 7: Representations received in relation to the potential Pool Court site	
Appendix 8: Shontelle Williams Report	
Appendix 9: Petitions	
Appendix 10: Representations received from councillors	
Appendix 11: Focus Group Meeting Notes (10-10-16 & 23-10-16)	
Appendix 12: Lewisham Traveller Forum Meeting Notes (11-10-16)	

## Executive Summary

Lewisham Council is preparing a planning policy document called the Gypsy and Traveller Site(s) Local Plan. It will identify a site to meet the local accommodation needs of the borough's travelling community.

This document is the consultation statement responding to the Regulation 18, Stage 2 consultation carried out between 17<sup>th</sup> October and 30<sup>th</sup> November 2016. During this stage of formal consultation, the Council sought feedback on two potential locations for a new site for gypsy and traveller pitches. The two sites were:

1. New Cross Social Club and adjoining Land (known as the New Cross Site)
2. Land at Pool Court (known as the Pool Court Site)

This document supports the preparation of the Local Plan and has been prepared in accordance with the Council's Statement of Community Involvement (SCI) and the Town and Country Planning (Local Planning) (England) regulations 2012 (as amended).

The consultation statement establishes the following, supported where appropriate by a number of appendices:

- Who we involved;
- How they were involved;
- A summary of main issues raised;
- Planning officer responses to issues raised (including how they will be addressed in the Local Plan);
- Further consultation work arising from the main issues raised during formal consultation; and
- Conclusion and next steps.

During the consultation, the Council used a number of techniques, namely:

- On-line and paper surveys;
- Letters of email;
- Drop-in information sessions;
- Focus groups;
- Traveller Forum; and
- Stakeholder Meetings.

A list of stakeholders that participated using these techniques and those which chose to organise petitions are identified in Table 1 below. Please note, some individuals may have participated in multiple activities.

**Table 1: Engagement Activities and Participation Levels**

Engagement Activity		Participation Levels
Written Representations	Surveys	177 surveys (submitted online and via paper)
	Letter or email	48 letters and emails
In person engagement	Information Session & Focus Groups	2 x Information sessions & Focus Groups were held.
		One session for Pool Court based stakeholders was held at the Resident's Lounge, 37 - 61 Pool Court, Catford and attended by 10 participants (excluding Council employees).
		The other session was held at Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate and attended by 19

Engagement Activity		Participation Levels
		participants (excluding Council employees).
	<b>Traveller Forum Meeting</b>	1 x Traveller Forum Meeting  The Traveller Forum meeting was held at Wesley Halls, attended by 10 people and discussed the merits of both potential sites.
<b>Petitions</b>		3 x petitions were submitted with a total of 433 signatures. The 3 petitions were from: 1) Lovelinch Close. 315 signatures in opposition to New Cross site 2) Wheelshunters Club, 61 signatures in opposition to New Cross site. 3) Pool Court, 57 signatures in opposition to Pool Court site.

Written representations have been considered and deemed to fall into the following categories: support, objection, neutral, no comment. The following table details participant's position with regards to the suitability of the site(s). In person representations are not included in the below table as due to the number of participants it was not always possible to determine a singular position.

**Table 2: Written representations position on the suitability of the two sites**

New Cross		Pool Court	
Support	31	Support	34
Objection	116	Objection	95
Neutral	31	Neutral	43
No comment	47	No comment	53

The main issues that require further consideration in order to progress the selection of a suitable site to meet the housing needs of Gypsy and Travellers and the Local Plan include the following:

- Conformity with the approved Search Parameters - the potential Pool Court site is not in Council ownership or available 'now';
- The concentration of traveller sites in close proximity to the potential New Cross site – impact on services, 'ghettoisation' and cumulative effect upon the existing community;
- Ownership and deliverability of both potential sites – queries over the Council's ownership of the existing Multi Use Games Area (MUGA) at New Cross and the fact that Network Rail own a large part of the Pool Court site;
- Flooding risks at both potential sites – but particularly Pool Court, which is adjacent to the River Ravensbourne and has flooded in the past;
- Vehicular access at both potential sites – exacerbation of existing car parking problem and effect on emergency access to the Winslade Estate at the potential New Cross site and concerns about families living next to a road and emergency access at Pool Court;
- Loss of community facilities and housing at the potential New Cross site – loss of the MUGA that serves the Winslade Estate and loss of the Wheelshunters Social Club and residential flat without any replacement;
- Loss of an operational business and employment land at the potential Pool Court site – the existing scaffolding business would be displaced;
- Site size and capacity at Pool Court – concern about the shape and size of the potential site and ability to satisfactorily accommodate 6 pitches;
- Amenity concerns including noise at both potential sites and privacy and air quality at the potential New Cross site;
- The loss of ecology and habitat associated with the Site on Importance for Nature Conservation (SINC) at the Pool Court Site

- Deprivation and vulnerable communities – both sites are in deprived neighbourhoods with limited ability to accommodate travellers alongside existing vulnerable communities; and
- Impact on services in areas of deprivation (both sites) – additional demand on school places, doctor's surgeries and other services.

Consultation also raised a number of general issues not specifically related to site suitability or the proposed development guidelines. These include the following:

- Pitch allocation and management - concern that tenancy agreements and highway restrictions would not be enforced;
- Housing need and the needs assessment – preferential treatment being given to the traveller community (over the settled community) and inadequate consideration of the needs of travelling show people;
- Use of second site as a stopping place – one of the two sites should be used as a negotiated stopping place to assist the Council and the Police in sopping unauthorised encampments'.
- Insufficient Integrated Impact Assessment of the two potential sites; and
- Inadequate consultation.

The Council has undertaken further work on some of these issues to help decide the suitability of both of the potential sites, as well as the draft development guidelines.

## 1. Introduction

- 1.1 Travellers are part of our diverse community in Lewisham. Lewisham Council is responsible for assessing the housing needs of the travelling community, as we are for all our residents. The Housing and Planning Act (2016) places a duty on local authorities to consider the needs of “people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.”
- 1.2 The Lewisham Gypsy and Traveller Accommodation Assessment (as updated in August 2016) into the housing needs of the Gypsy and Traveller community identified there are no current pitches in the borough and that there is a future need for at least six permanent pitches over the next 15 years, up to 2031. The breakdown of need over 15 years in Table 3 below. The study did not identify any need for transit pitches or Travelling Show people plots in the borough.

**Table 3 – Additional Need for Travelling Households by 5-year periods**

Year	0-5	6-10	11-15	
5 Year Periods	2016-2021	2021-26	2026-2031	Total
Lewisham – Travellers	3	2	1	6

- 1.3 We are currently preparing a single-issue Local Plan with the aim of allocating a single site to meet the local accommodation needs of Gypsy and Traveller communities within the borough.
- 1.4 The Gypsy and Traveller Site(s) Local Plan will form part of Lewisham’s development plan and will identify and designate land in the borough to accommodate the identified need for gypsy and travellers in accordance with National Planning Policy for Traveller Sites (August 2015).
- 1.5 Community and stakeholder engagement has included two stages of formal consultation. These two stages have provided an opportunity to inform the type and location of potential sites and criteria used to determine site suitability and to comment on two sites deemed to be potentially suitable using the finalised criteria. The two stages are:
- Stage 1 consultation: Scope of the local plan, site search parameters and site selection criteria; and
  - Stage 2 consultation: Potential sites and development guidelines.
- 1.6 Stage 1 consultation was undertaken between 3 March 2016 and 22 April 2016. The purpose of the engagement programme was to seek feedback on:
- the scope of the plan;
  - the proposed search parameters to be used to identify a site or sites;
  - the proposed selection criteria to assess alternative sites;
  - the proposed timetable for preparing the plan; and
  - an Integrated Impact Assessment (Scoping Report).
- 1.7 The Consultation Statement on this stage of the process was published in August 2016 and summarises the main issues raised in relation to the above, together with officer comments.



- 1.8** Stage 2 consultation was undertaken between Monday 17 October 2016 and Wednesday 30 November 2016. Consultation took place over a 6 week, 2-day period. Consultation was extended for a two-day period to take account of the press notice being published on Wednesday 19 October 2016.
- 1.9** The purpose of the engagement was to seek feedback on two potential locations for a potential traveler site and draft development guidelines that would help determine how a chosen site is developed. The potential sites are:
- New Cross Social Club and adjoining land, New Cross
  - Land next to Pool Court, Catford

## 2 Who we involved

- 2.1** The National Planning Policy Framework (NPPF) states that a wide section of the community should be engaged in the preparation of Local Plans, so that as far as possible, they reflect a set of agreed priorities for the sustainable development of the area (paragraph 155).
- 2.2** We, the Local Planning Authority, are required by legislation, Regulation 18(2) of the Town and County Planning (Local Planning) (England) Regulations 2012 to consult
- Specific consultation bodies such as national agencies and neighbouring planning authorities that they consider may have an interest in the subject of a proposed Local Plan.
  - General consultation bodies such as organisations that represent the interest of different ethnic groups, and
  - Such residents or persons conducting business within the area and from whom representations would be appropriate.
- 2.3** During Stage 1 consultation on the scope, search parameters and selection criteria, we invited the groups identified below to make representations. For Stage 2 consultation, we invited comments from these groups again, together with, as far as possible, those who had made representations during Stage 1.
- Existing residents and businesses within the borough
  - Representatives for and members of the Gypsy and Traveller and community within the Borough
  - Local service providers
  - Consultees listed on the planning policy database
- 2.4** A list of specific consultation bodies that were consulted with is provided in Appendix 1. A list of general consultation bodies that were consulted is provided in Appendix 2.

### 3 How we involved the community

3.1 The preparation of the Gypsy and Traveller consultation was undertaken in accordance with the Council's Statement of Community Involvement (2006). The SCI establishes the consultation methods used in the preparation of planning policy documents in order to fulfil statutory requirements.

3.2 Consultation was undertaken over a 6-week period between 17 October 2016 and 30 November 2016. Consultees were invited to participate via a number of mechanisms, both written and in person. See below:

- **Surveys** were available online or hard copy for completion. Targeted questions were used to gain feedback on the potential sites and draft development guidelines.
- Two **focus groups** were held with older members of the local community near the two potential sites, some of whom also had disabilities that would prevent them from attending a drop-in information session. The focus groups provided an opportunity to obtain in-depth information and answer questions from members of the community often considered 'hard to reach'. Pool Court managed by L&Q and Lewis Silken House, managed by Lewisham Homes respectively.
- **Drop-in Information Sessions** were held close to each potential site to allow community members to find out more about each potential site, ask questions and speak directly to council officers and inform officers of their views. A static display was prepared to present key information about the project and potential sites. These sessions enabled information to be shared as well as gathered by officers and stakeholders alike.
- Officers attended the **Lewisham Traveller Forum** to discuss the merits of the potential sites.
- **Letters and emails** were received from statutory bodies, organisations, the owner of part of the Pool Court site and organisations representing the interests of gypsies and travellers.

3.3 It was communicated to stakeholder that they had a number of methods to respond via a written representation or in person and the dates with which consultation responses were required. Details provided were as follows:

- **Online:** [https://lewisham-consult.objective.co.uk/portal/planning\\_policy](https://lewisham-consult.objective.co.uk/portal/planning_policy)
- **Email:** [planningpolicy@lewisham.gov.uk](mailto:planningpolicy@lewisham.gov.uk)
- **Letter:** Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE64RU
- **In person/verbally:** comments were made at stakeholder meetings via note taking

3.4 A number of tools and techniques were used to ensure that interested parties were aware of the consultation and how to become involved. See below:

- **Introductory emails and letters** were sent at the commencement of the engagement process inviting government agencies, and interested organisations and bodies listed on the Council's planning policy database to participate in the engagement process.
- **Site notices** were placed on lamposts around the two potential sites at the commencement of the consultation, and inspected twice and replaced if necessary when council officers were in the area.
- A **public press notice** in the News Shopper, a weekly printed newspaper, was used to build awareness of the consultation and opportunities for involvement, particularly amongst those without access to email or a computer.
- An **e-newsletter article** was placed in the Lewisham E-newsletter. This was used to build awareness of the project and inform community members about the consultation.
- A **flyer** was prepared to build awareness of the consultation and opportunities for involvement. The flyer was available at borough libraries, at the two drop-in

information sessions, the Council's Planning Information Office and Phoenix Community Housing's main office.

- **Social media** including blogs, posts and tweets as means to aid dissemination of information via online methods.

3.5 Relevant and accessible information was provided to inform stakeholder understanding and aid accessibility to the issues.

- **A Potential Sites Consultation Report** was prepared to identify the two potential sites for allocation as a gypsy and traveler site and associated development guidelines. This report also established how to provide feedback on the consultation.
- A **project webpage** at [www.lewisham.gov.uk/travellingcommunity](http://www.lewisham.gov.uk/travellingcommunity) was prepared to communicate key information about the project, including the steps needed to find and establish a site, the potential sites consultation and information about gypsy and traveller culture and answers to other 'frequently asked questions'. It also contained copies of consultation documents, supporting material and a link to the online survey and the local plan page in the planning policy section of the Lewisham website.
- Information sheets were developed to provide key information for people without access to email or a computer. These contained the information available on the project webpage.
- Information repositories were used to make consultation documents available to view and use at all borough libraries and at the Council's main office at Laurence House, Catford for the duration of the consultation. During the consultation, the flyers, information sheets and questionnaires were also placed in the Winslade Estate's local convenience store and children's nursery, on request.
- Two drop-in information sessions (as previously described under the consultation section) were held close to each potential site to allow community members to find out more about each potential site, ask questions and speak directly to council officers and inform officers of their views. A static display was prepared to present key information about the project and potential sites.

## 4 Feedback Levels and Summary of the Main Issues

- 4.1 Regulation 18, Stage 2 consultation sought representations on the suitability of two potential sites and associated development guidelines.
- 4.2 The following section, and supporting appendices, have been prepared to meet the requirements of the SCI and relevant legislation, Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 which details how reporting back on consultation must be conducted.
- 4.3 This section provides a quantitative assessment of feedback and identifies the main issues raised by stakeholders during Regulation 18, Stage 2 of the Gypsy and Travellers Local Plan and identifies the Council' response to the issues presented.
- 4.4 The supporting 12 appendices confirm who was invited to comment (and who actually commented) and set out the comments together with a short officer response. The summaries use the site based and thematic structure provided by the main issues to organise comments.
- 4.5 The quantitative assessment identifies levels of participation via the different engagement activities. It also identifies the position of written representors regarding suitability of the two sites and the frequency with which the main issues were raised.
- 4.6 Table 4 below, identifies that a number of engagement activities were used and it should be noted that some individuals may have participated in multiple activities.). This was to aid greater levels of participation. Table 4 also identifies the level of participation with each activity.

**Table 4: Engagement Activities and Participation Levels**

Engagement Activity		Participation Levels
<b>Written Representations</b>	<b>Surveys</b>	177 surveys (submitted online and via paper)
	<b>Letter or email</b>	48 letters and emails
<b>In person engagement</b>	<b>Information Session &amp; Focus Groups</b>	2 x Information Session & Focus Groups were held.  One session for Pool Court based stakeholders was held at the Resident's Lounge, 37 - 61 Pool Court, Catford and attended by 10 participants (excluding Council employees).  The other session was held at Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate and attended by 19 participants (excluding Council employees).
	<b>Traveller Forum Meeting</b>	1 x Traveller Forum Meeting  The Traveller Forum meeting was held at Wesley Halls, attended by 10 people and discussed the merits of both potential sites.
<b>Petitions</b>		3 x petitions were submitted with a total of 433 signatures. The 3 petitions were from: 1) Lovelinch Close. 315 signatures in opposition to New Cross site 2) Wheelshunters Club, 61 signatures in opposition to New Cross site. 3) Pool Court, 57 signatures in opposition to Pool Court site.

- 4.7 Written representations have been considered and deemed to fall into the following categories with regards to the question of site suitability for the New Cross site and Pool Court Site: support, objection, neutral, no comment. The following table details participant's position with regards to the suitability of the two sites. In person representations are not included in the below table as due to the number of participants it was not always possible to determine a singular position.

**Table 5: Written representations position on the suitability of the two sites**

New Cross		Pool Court	
Support	31	Support	34
Objection	116	Objection	95
Neutral	31	Neutral	43
No comment	47	No comment	53

- 4.8 The summary of main issues has been organised in the following format:
- Table 6: Summary of main issues relating to New Cross site (site suitability and development guidelines)
  - Table 7: Summary of main issues relating to Pool Court (site suitability and development guidelines)
  - Table 8: Summary of main issues related to both sites
  - Table 9: Summary of other main issues (including Integrated Impact Assessment) not specifically related to site suitability or development guidelines

Table 6: Summary of main issues related to New Cross site		
Key Issues	Summary of issue	Officer Response
Concentration of Traveller Sites	<p>There are four gypsy and traveller sites in Southwark within 1500m of the potential New Cross Site.</p> <p>Some members of the Lewisham traveller community have expressed grave concerns about the risk of intimidation and harassment from the Southwark traveller community (Traveller Forum 11-10-16)</p>	<p>The issue was raised by a number of individuals during consultation on the draft Search Parameters and Site Selection Criteria. However, in July 2016, the Mayor and Cabinet accepted officer's response that given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, an 'exclusion zone' was not appropriate. Such a restriction would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources is unsubstantiated (see Table 8 below).</p> <p>The Metropolitan Police recognise these concerns and is more supportive of the Pool Court site. Officers too accept that these fears are genuine. However, a site would not be provided for individuals but for the Lewisham traveler community. Suitable pitch allocation and management arrangements would enable those people with a Lewisham connection who wanted to live on a site to apply and pitches would be allocated based on housing need.</p>

<b>Table 6: Summary of main issues related to New Cross site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
Ownership and Deliverability	Individuals at the New Cross drop-in session queried the Council's ownership of the existing Multi Use Games Area (MUGA).	The freehold of the site is owned by the Council. The New Cross Social Working Men's Club initially had a 60-year lease of the whole site (up to January 2034). The land now occupied by the MUGA was surrendered to the Council in 2006, to allow for the MUGA to be built in consideration of the rent under the lease being reduced. In 2010, the Council granted a one year to the Wheelshunters Club to stay in the Social Club building. However, the initial 60-year lease was not terminated and remains in place. The Council will need to regularise the lease situation by taking appropriate steps to terminate this lease. The Wheelshunters Club also remains in occupation of the Social Club building and this occupational arrangement would need to be terminated
Flood Risk	The Environment Agency (EA) does not rule out this site, but it does raise some concerns. The site is in Flood Zone 3 (High Risk) but benefits from Thames Tidal Defences. Technically the site is considered to be at risk from 'upstream inundation' of the Thames area in the scenario that lateral flood defenses were removed and the Thames Barrier was closed.	The flood risk scenario is unlikely and in any event flood waters would take 6-12 hours to reach the site. Officers have met with the EA and the EA officers at the meeting considered that there was the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated. The potential mitigation discussed was as follows: <ul style="list-style-type: none"> <li>• Flood warnings (including possibly an on-site siren).</li> <li>• Possible tethering of caravans to the site – to prevent them from being washed away/causing debris hazard.</li> <li>• Raising of land to deal with any local surface water/critical drainage issues.</li> </ul> The above potential mitigation measures could be referred to in the site-specific guidance if the New Cross site was chosen.

<b>Table 6: Summary of main issues related to New Cross site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
Car Parking & Vehicular Access	Car parking on the Winslade Estate is currently a major concern of residents and some concerns have been expressed that a site here could exacerbate the problem and/or impede emergency access to the Estate.	<p>The Highway and Access Feasibility Report (October 2016) tested vehicular access and turning space requirements for an occasional delivery of a large mobile home to a site (18.5m vehicles, which are longer than a fire engine). The study found that this was achievable, but noted that parking restrictions would need to be introduced opposite an entrance (likely to displace 6 kerb-side spaces) and that large vehicles would need to be guided in and out of a site.</p> <p>The above would result in some loss of kerb-side parking opportunities, as referred to above, but this would be partly off-set by closing the existing vehicular access to the Social Club car parking – so the net loss is likely to be in the order of 4 to 6 spaces.</p> <p>Lewisham Homes has introduced a gate to the southern end of Lovelinch Close and Sharrat Street as part of wider traffic management arrangements for the Estate designed to tackle anti-social behaviour. Vehicular access is now restricted to Rollins Street. Officers do not consider that the establishment of a traveller site on Hornshay Street would impact on these arrangements.</p> <p>Officers have met with the London Fire Brigade to discuss issues and they have raised no particular concerns about this potential site.</p>
Loss of MUGA	The New Cross Gate Trust, New Cross Learning, the REM Educational Centre, Queens Road GP Surgery, Somerville Youth and Play Provision, the Lewisham Outreach Service for Gypsy and Roma Travellers and a number of individuals have objected to the loss of the existing MUGA. The GLA has called for the MUGA to be re-provided.	The existing MUGA was funded by the former New Cross Gate NDC and Marathon Trust and provided in 2006/07 following lobbying from local people. It comprises 3 separate games court areas (two kick-about areas and an informal basketball practice area) of approx. 720sqm, together with adjacent team areas, including two seats/shelters. The nearest other MUGAs are Brimington Park in Southwark on the south side of Old Kent Road



<b>Table 6: Summary of main issues related to New Cross site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>(approx. 500m away).</p> <p>The Potential Sites Report made clear that mitigation for the loss of the existing MUGA would be required by way of improvements to an existing facility or a replacement facility. Officers have commissioned a feasibility study in to providing replacement facilities on a garage and hardstanding area adjacent to Upnall House, directly opposite the potential site on the north side of Hornshay Street. The study finds that this space could provide 1 multi-use games area and a team area of approx.407sqm or a multi-use games area and separate informal basketball practice area of approx.323sqm. Whilst these options would mean that there would be a significant net loss of games space, it would enable replacement smaller facilities to be provided in the immediate area. Officers consider that facilitating the provision of a traveller site could represent special circumstances that justify such a loss.</p> <p>Officers have also commissioned a masterplan capacity study for this potential site. This suggests that it would be possible to provide 6 pitches whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement larger kick-about area provided on land at Upnall House, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The masterplan capacity study also identifies an option of providing 6 pitches with individual vehicular accesses and replacement multi-use games area on the site of the existing Social Club car park that could possibly retain all facilities and avoid any net loss in space.</p> <p>Whilst there has been some discussion with Lewisham Homes</p>

<b>Table 6: Summary of main issues related to New Cross site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		about the Upnall House option, there has been no consultation with local residents or users of the existing games courts about this or the masterplan capacity study. This would take place if this potential site was chosen to go forward.
Loss of Social Club and residential flat	The Wheelshunters Club, the Lewisham Outreach Service for Gypsy and Roma Travellers and a number of individuals have objected to the loss of the Social Club and/or residential accommodation. The GLA has called for the social club to be re-provided.	<p>The Social Club is a licensed bar and hall providing live entertainment and is open to hire for events (weddings etc.). It is also used by a local church for meetings. The building includes a residential flat. The loss of the Social Club and housing without mitigation would be against policy. However, this needs to be balanced against Core Strategy Policy 2 which makes clear that the Council will assess and provide for the identified needs of the gypsy and traveller community. Officers consider that facilitating the provision of a traveller site (which would result in a net gain of residential accommodation) could represent special circumstances that justify the loss of the Social Club and existing residential flat.</p> <p>During a stakeholder meeting, the current tenants (the Wheelshunters Club) asked whether there would be an opportunity for them to get involved in the redevelopment of Scotney Hall on Sharratt Street. The Hall re-opened at the end of April 2017 following refurbishment. It may be able to accommodate some of the functions currently offered by the Social Club (e.g. weddings), but officers do not consider that this would be a suitable location for a licensed private members club. The Council could provide the Wheelshunters Club with the maximum notice possible to vacate the premises and assist it suitable alternative accommodation in the area.</p>
Privacy	The New Cross Trust and a local resident have raised concerns about privacy.	The potential site is between approx. 13 and 18m to the south of Saltwood House (a four-storey block of flats that looks directly on to the site) and

<b>Table 6: Summary of main issues related to New Cross site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>approx. 22m to the south of Upnall House (a four-storey block of flats that presents a blank flank wall to the site).</p> <p>There are many streets in London where homes face each other across a street that is 13m wide. In this case, pitches would contain single-storey caravans/small buildings and homes in Saltwood house would look down on them. The site-specific guidance included in the Potential Sites Consultation Report calls for a boundary treatment that protects the privacy of residents living on the site and tree planting to improve the street scene. With these things in place, the privacy of existing residents of Saltwood House and future residents of a site should be safeguarded.</p>
Noise & Air Quality	The New Cross Trust and a local resident have raised concerns about the suitability of the site in terms of noise and air quality.	The Council's Environmental Protection Team has highlighted the need to consider noise from the elevated railway lines that form the southern and western boundaries of the site, but raised no objection in principle to residential use of the site. Caravans are generally not well insulated against noise and the layout, orientation and design of pitches and associated structures would need to take account of this. The site is within Air Quality Management Area 1, but is away from main roads and occupiers would be unlikely to have high exposure to poor air quality.

<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
Compliance with Search Parameters	Bellingham councillors have raised the concern that the approved Parameters include that that the proposed land for the site be Council-owned and available now.	The Mayor and Cabinet report (January 2016) and Potential Sites Report make clear that private land adjoining Council owned land may be considered suitable if it were considered necessary to develop a Council asset. The National Planning

<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>Policy for Traveller Sites' notes that to be considered deliverable sites should be available 'now', offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years.</p> <p>This definition was adopted as Site Selection Criteria 10. Part of the Pool Court site is currently owned by Network Rail, with the possible small addition of current public highway owned by London &amp; Quadrant. Whilst not all the potential site is available 'now', although officers consider that the site is deliverable in that it could be provided within 5 years. In addition, it may be possible to develop the site in phases (with at least 3 pitches on the Council-owned land delivered up to 2021 and at least three further pitches being developed on land currently owned by Network Rail between 2021 and 2031. This option would need to be investigated further.</p>
Ownership and Deliverability	<p>LBL owns the land to the north of Pool Court itself. Network Rail (NR) owns a sliver of land between this land and the River and the adjoining scaffolding site. London &amp; Quadrant Housing Association owns Pool Court highway land.</p>	<p>The Council owns the western part of the potential site, but not a sliver of land between the site and the Ravensbourne River. Network Rail owns this sliver of land and also the eastern part of the potential site, which is partly occupied by a scaffolding yard which has a lease expiring in 2020. Officers have held discussions with Network Rail over the possibility of purchasing its interest in this land. Network Rail is currently undertaking a portfolio sale of its commercial estate. However, in August 2017, in response to a letter from the Mayor, Network Rail confirmed that owing to the requirement to produce a definitive portfolio of assets for the marketing and potential disposal of its commercial estate, it is no longer able to consider offers for the sale of the eastern part of the potential site. On this basis, the Council would need to discuss purchase with the new owner of the land. Officers understand that Network Rail is</p>

<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>hoping to dispose of its commercial estate in June 2018.</p> <p>Officers understand that the portfolio disposal is scheduled to be complete by June 2018. Given this, officers consider that there is the reasonable prospect that the Council could purchase the scaffolding yard from a new owner (either by agreement or compulsorily), secure planning permission and begin to deliver a traveller site by the end of 2021. In addition, it may be possible to develop the site in phases – as discussed above.</p> <p>Officers have also investigated the possibility of further rationalising the potential site so include part of the existing hammer head vehicular-turning area at the northern end of Pool Court. This is not essential for servicing existing housing and is often the subject of fly-tipping. The inclusion of all or some of this area within the potential site would improve its deliverability by marginally increasing its size, but more importantly by and improving its shape. This would require the closure of an area of public highway and the acquisition of the stopped-up highway land from London &amp; Quadrant Housing Association.</p>
Flood Risk	Ward councilors, some individuals, the Environment Agency and Phoenix Community Housing Association have raised concerns about flood risk.	<p>The north-western part of site has flooded in the past (1965) and the Environment Agency (EA) has raised some significant concerns. Since the EA submitted its written concerns, it has released results of recent modelling of the Ravensbourne River for a 1:100-year flood event including 25 and 35% allowances for climate change. Consultants have mapped the likely extent of flooding on the site and officers and consultants have met with the EA.</p> <p>The modelling shows flood water running back from the River along the adjoining railway corridor and extending on to the western part of the potential site by about 5m. EA</p>

<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>officers at the meeting considered that there was the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated. The potential mitigation discussed was as follows:</p> <ul style="list-style-type: none"> <li>• Setting back development 8m from the existing river channel, investigating naturalising the southern bank (i.e. removing the concrete wall) and follow guidance in the Council's River Corridor Supplementary Planning Document.</li> <li>• Avoiding locating caravans, car parking and hard-standing areas which could be used for storage purposes in the high flood risk western part of the site</li> <li>• Incorporating SUDS (e.g. green roofs on permanent buildings) where possible - including devices to control rates of discharge in to the River to green field run off rates – when not in flood and consider providing attenuation ponds to provide surface water storage and amenity value</li> <li>• Incorporating like-for-like level compensation works if ground levels need raising in some areas.</li> <li>• Safe and dry route to safety.</li> <li>• Flood Evacuation Plan.</li> </ul> <p>Site-specific guidance contained in the Potential Site Consultation Report already refers to the need to set development back 8m from the River and take account of the River Corridor Improvement Plan. Officers recommend that if this site is chosen the guidance is revised to provide additional guidance on potential mitigation and flood resilient design.</p>
Vehicular Access	The Lewisham Outreach Service for Gypsy and Roma Travellers has raised concerns that families would	The Highway and Access Feasibility Report (October 2016) tested vehicular access and 'swept path analysis' (vehicle turning space

<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
	live next to a site road and Phoenix Community Housing Association and some individuals have raised concerns about emergency access.	<p>requirements) for an 18.5m lorry (which is bigger than a fire engine) for three scenarios: (1) In and out via scaffolding yard, (2) In and out via Pool Court and (3) In from Scaffolding yard and out from Pool Court.</p> <p>All scenarios allow for a lorry to enter and leave in forward gear but take up different amounts of the site. The Potential Sites Consultation Report incorporates Scenario 1, on the basis that an in and out single access from Fordmill Road is preferable to traveller site traffic using Pool Court to exit a site. Officers consider that likely levels of traffic mean that family-sized pitches would be acceptable. Such an approach should not be unduly disruptive for the proposed traveler community and should not cause inconvenience for users of Fordmill Road or existing local residents</p> <p>Officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade considered that that there would be no need for a secondary vehicular access a pedestrian-only exit on to Pool Court was desirable, but not essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met the all relevant guidance and best practice.</p>
Loss of operational business and employment land	The existing scaffolding business (RHS Site Services) and a number of individuals have objected to the loss of the existing scaffolding yard/employment land.	Core Strategy Policy 5 and DM Policy 11 seek to protect the scattering of employment locations throughout the borough outside of designated employment locations. However, officers consider that facilitating the provision of a traveller site could represent special circumstances that justify this loss. If this site went forward, officers would consider what re-location assistance the Council would be able to offer.

<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
Loss of ecology and habitat	Natural England, Phoenix Community Housing Association and some individuals object to the loss of green space/ adverse impact on nature conservation.	<p>Currently the whole site is within the Pool Court Linear Park Site of Importance for Nature Conservation (SINC) (Borough Importance), although the Re-Survey of SINCs 2016 proposes to exclude the scaffolding yard from the designation. Planning Policy CS 12 &amp; Site Allocations Local Plan seek to protect SINCs.</p> <p>Officers anticipate that the ecological value of the potential site would be relatively limited due to the dominance of Japanese knotweed across the Council owned land. Overall, officers consider that a carefully designed scheme that eradicates Japanese knotweed, appreciates the river, retains/mitigates the loss of existing valuable trees and any protected species issues would be acceptable.</p> <p>Site-specific development guidance contained in the Potential Site Consultation Report already calls for careful treatment next to the River, retention of trees where possible and careful lighting. This could be strengthened if this potential site went forward.</p>
Site size and capacity	Phoenix Community Housing Association has raised concerns about the shape and size of the site and lack of access to open space. A number of individuals share concerns about shape and size.	<p>Following clarification on ownership and minor adjustments, the overall potential site measures approx. 3,150sqm. Officers have commissioned a masterplan capacity study for this potential site. This demonstrates that the site could satisfactorily accommodate at least 6 pitches in accordance with the draft development guidelines in the Potential Sites Report (including a single in-out vehicular access from Fordmill Road and pitches set back 8m from the River) and also taking account of subsequent advice from the Environment Agency to pull caravans away from the western boundary. The study also looked at two other options – including an option with vehicular access in from Fordmill Road and out via Pool Court</p>



<b>Table 7: Summary of main issues related to Pool Court site</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>and an option with vehicular access just from Pool Court.</p> <p>If this site is chosen, it may be possible and desirable to include all or part of the existing hammer-head turning area at the northern end of Pool Court in to the potential site It should be noted that this would require re-consultation, the associated closure of area of public highway and the acquisition of the stopped-up highway land from London &amp; Quadrant Housing Association.</p> <p>A traveller site here could be developed to provide areas of open space and shared use, including the naturalization of the southern bank of the Ravensbourne River.</p>
Amenity	Phoenix Community Housing Association has raised the concern that the site is not suitable due to noise from adjoining railway lines, particularly freight trains using the ground level tracks immediately to the west of the site.	The Council's Environmental Protection Team has highlighted the need to consider noise from neighbouring railway lines, but raised no objection in principle to residential use of the site. Caravans are generally not well insulated against noise and the layout, orientation and design of pitches and associated structures would need to take account of this. If this site was chosen, it is recommended that the site-specific guidance is amended to reflect this and to refer to the need for a solid fence of appropriate mass/sound reduction qualities to be installed along the western boundary.

<b>Table 8: Summary of main issues related to both sites</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
Deprivation & vulnerable communities	A number of consultees have raised concerns that the two potential sites are in deprived neighbourhoods and the ability of these neighbourhoods to accommodate travellers alongside existing vulnerable communities	New Cross is the second most deprived Ward in Lewisham and Bellingham (which includes the potential Pool Court site) is the third most deprived Ward. Both potential sites are within the 20% most deprived neighbourhoods (Lower Layer Super Output Areas) in the country.

<b>Table 8: Summary of main issues related to both sites</b>		
<b>Key Issues</b>	<b>Summary of issue</b>	<b>Officer Response</b>
		<p>Introducing a traveller site in either potential location would pose challenges to creating and maintaining a mixed and balanced community in the wider neighbourhood which they would sit within. If either of these sites is chosen, the Council and its partners would need to strengthen its efforts to increase the capacity and resilience of local communities. In addition, officers recommend that the Outreach Worker facilitates meetings between local residents and members of the Lewisham traveller community to build understanding and community cohesion during the detailed design and planning stages and beyond.</p>
Impact on services and facilities	The arrival of new persons and families at the site places an additional demand on school places, doctor's surgeries and other services.	<p>The traveller community does have particular needs around education and health and faces particular challenges in accessing health, education and other services. Officers have engaged with the Council's School Places Manager and NHS Lewisham Clinical Commissioning Group (CCG) at all stages of the process. The CCG has responded to the latest consultation stating that it considers that the impact on health services would be minimal for either site.</p> <p>Officers do not envisage that the population generated by the provision of the site (circa 20-25 people) would add undue pressure on local infrastructure or services – including in combination with existing traveller sites in Southwark in relation to the potential New Cross site. However, it is recommended that liaison takes place with local schools and GP surgeries once a preferred site is known to enable them to make any adjustments to service provision that may be necessary in advance of a site being first occupied.</p>

**Table 9: Summary of other main issues**

Other main issues	Summary of issues	Officer Response
Pitch allocation and management	<ul style="list-style-type: none"> <li>• There is a concern that tenancy agreements and road restrictions wouldn't be enforced.</li> <li>• Further concern around waste management, noise, unsupervised children, overcrowding of the site.</li> </ul>	<p>Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified.</p> <p>The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site and managing potential anti-social behaviour (such as burning off material).</p>
Housing need and the needs assessment	<p>Is the Council giving preferential treatment to members of the travelling community compared to others residents and are travellers get to choose where they live?</p> <p>The LB Bromley considers that the needs of those on its waiting list, provides a realistic understanding of families who have an evidenced desire to locate on Bromley pitches. And notes that once Lewisham opens a site/s, a waiting list may attract applications from these families in brick and mortar with links to Lewisham.</p> <p>The LB Bromley notes that the identified zero requirement for Travelling Show people is determined on the basis that there are currently no yards in Lewisham and the view of a representative of the Showman's Guild of Great Britain that they would be looking at existing yards and surrounding land. It considers this to be a circular argument with the</p>	<p>The Housing and Planning Act (2016) places a specific duty on the Council to consider the needs of travellers. It does this alongside assessing the housing needs of the majority settled community. Officers have engaged with individual travellers through the Lewisham Traveller Forum and with organisations that represent the traveler community.</p> <p>Notwithstanding the above, comments made from all individuals and organisations have equal weight. Officers consider that the assessment that there is a lack of need for plots for travelling show people is reasonable and will continue to address wider sub-regional traveller and show people needs, including the need for a transit site, through Duty to Co Operate discussions with neighbouring boroughs.</p>

<b>Table 9: Summary of other main issues</b>		
<b>Other main issues</b>	<b>Summary of issues</b>	<b>Officer Response</b>
	lack of an allocation (making new yards onerous) being used to justify the zero allocation.	
Use of second site as a stopping place.	<p>The Lewisham Outreach Service for Gypsy and Roma Travellers and the London Gypsy and Traveller Unit have raised the prospect of one of the potential sites being developed as a permanent residential site and the other being developed as a negotiated stopping place - to assist the Council and the Police to direct Travellers who stop on unauthorised encampments.</p> <p>The LB Bromley has notes that policy 12 in its Submission Draft Local Plan (2016) indicates that, with regard to transit pitches, "the Council will work with the sub region to secure their provision in an appropriate location within the sub region". Such work will be undertaken mindful of the numbers of incursions experienced by boroughs and the sub regional provision for Travelling Show people that Bromley already provides.</p>	<p>The Gypsy and Traveller Accommodation Assessment Update (August 2016) notes that there is the possibility that changes to the definition of 'gypsy and traveller' could result in increased levels of travelling but it is not recommended that there is a need for the Council to consider any transit provision at this time.</p> <p>The Council and the Metropolitan police have developed a joint policy and protocol for unauthorised encampments and officers do not consider that there is the need for a transit site or a negotiated stopping place.</p>
Integrated Impact Assessment (IIA) (August 2016)	<p>New Cross Gate Trust, Shontelle Williams, Historic England, the London Gypsy &amp; Traveller Unit and the Outreach Services for Gypsy Roma Travellers make a number of comments, as follows</p> <ul style="list-style-type: none"> <li>• The IIA is completely insufficient and comes across as a 'tick box' exercise. Challenge specific assertions (New Cross Gate Trust)</li> <li>• There are designated</li> </ul>	The latest IIA (October 2017) takes account of these comments.

<b>Table 9: Summary of other main issues</b>		
<b>Other main issues</b>	<b>Summary of issues</b>	<b>Officer Response</b>
	<p>heritage assets (Conservation Areas) in close proximity to both of the sites and these should be considered as part of the IIA process. It is advised that the Council's heritage specialist is actively engaged in the preparation of the Gypsy and Traveller Local Plan (Historic England)</p> <ul style="list-style-type: none"> <li>• There is a missed opportunity under the IIA objective "to mitigate and adapt to the impact of climate change". Connected green space and green infrastructure help species adapt and relocate in response to climate change (Natural England).</li> <li>• Consideration of the proposed New Cross site and Lovelinch Close should be treated as one site as the MUGA aims to principally serve Lovelinch Close and the social, environmental and access issues effecting Lovelinch Close also affect the proposed site (Shontelle Williams).</li> <li>• Should acknowledge the positive impacts the proposed site allocations would have in addressing some of the inequalities facing the Gypsy and Traveller community, particularly in terms of health (LGTU and Outreach Services for Gypsy Roma Travellers).</li> <li>• Agree that the New Cross Social Club site will "increase, maintain and enhance open space, biodiversity, flora and fauna" by..." The</li> </ul>	

<b>Table 9: Summary of other main issues</b>		
<b>Other main issues</b>	<b>Summary of issues</b>	<b>Officer Response</b>
	proposed tree planting along the boundary with Hornshay Street". (Natural England)	

## 5 Further investigations

5.1 The consultation has highlighted that in order to determine site suitability, further work must be undertaken at both sites. Further assessment of the following matters has taken place:

- Clarifying ownership issues in relation to the New Cross site and considering ways to regularise lease arrangements in relation to the Social Club;
- Commissioning a study in to a possible re-provision of smaller MUGA facility on land at Upnall House opposite the potential New Cross site (MUGA Re-provision Study) and holding discussions with Lewisham Homes;
- Holding discussions with Network Rail over acquiring the scaffolding site at Pool Court and raising with London and Quadrant Housing Association the possibility of acquiring a small area of existing public highway land at Pool Court;
- Seeking officer advice in relation to ecological impact at Pool Court.
- Commissioning further advice on flood risk issues and holding discussions with the Environment Agency in relation to both potential sites;
- Holding discussions with the London Fire Brigade in relation to both potential sites; and
- Commissioning a Masterplan Capacity Study for both potential sites to explore how they might be developed – both in accordance with the draft Site-specific Development Guidelines included in the Potential Sites Consultation Report and otherwise.

5.2 The further assessment work has involved further engagement with stakeholders, including:

- Lewisham Homes;
- Network Rail;
- London & Quadrant Housing Association;
- London Fire Brigade; and
- Environment Agency.

## 6 Conclusion and Next Steps

### Conclusion

- 6.1 Consultation on the Regulation 18, Stage 2 Consultation was carried out in accordance with the Council's Statement of Community Involvement (SCI) (2006) between 17 October and 30 November 2016. Further work, including stakeholder engagement was carried out following this period.
- 6.2 All representations (letters, emails, survey response, petitions, drop in sessions and focus group meetings) have been recorded. This consultation statement serves as a record of how consultation was conducted, with whom it was conducted, what the main issues were and how these issues are influencing the development of the Gypsy and Traveller Site(s) Local Plan as well as the Integrated Impact Assessment.
- 6.3 There was a large response to this consultation and the comments were received from high interest stakeholders including Lewisham's travelling community and organisations representing their interests, landowners, business and residents directly adjacent to or on the two sites, service providers, statutory bodies and users of community facilities. The volume and diverse number of stakeholders involved in the consultation provides an informed assessment of the suitability of the two proposed sites and proposed development guidelines.

### Next Steps

- 6.3 Representations received during the consultations (Stage 1 and Stage 2), together with directions set out in government policy and evidence from further investigations are being used to inform discussions and:
- 1) determine the suitability of the potential sites;
  - 2) identify one site as preferential for allocation as a residential traveler site
  - 3) inform changes to the relevant development guidelines and;
  - 4) prepare the Draft Local Plan for publication and submission to the Secretary of State for examination
- 6.4 Further consultation (Regulation 18, Stage 3) may be necessary before the Council decides whether one of the potential sites is suitable and should be allocated for a residential traveller site.
- 6.5 Once a site has been identified as the preferred site for allocation for a residential traveler site and associated development guidelines have been revised, we will then publish the proposed 'submission' version of the Plan, also known as the Regulation 19 document, and make it available for comments on the 'soundness' of the plan prior to its submission to the government.



## Appendix 1 – Specific Consultees

The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended) defines the following organisations as ‘specific consultation bodies’. The following bodies were consulted as part of the Regulation 18, Stage 2 Local Plan consultation.

- London Fire Brigade
- Lewisham Clinical Commissioning Group
- Metropolitan Police
- Deputy Director Public Health
- Lewisham Council Lead Local Flood Agency
- Lewisham Council Environment Agency Team
- Lewisham Council Education Team
- Virgin Media
- EE
- Vodafone
- Telefonica
- Three
- British Telecommunications
- Marine Management Organisation
- Natural England
- Office of Rail and Road
- Mayor's Office for Policing and Crime
- SELCHP
- Transport for London (TFL)
- Greater London Authority (GLA)
- Environment Agency
- London Borough of Bromley
- London Borough of Croydon
- London Borough of Lambeth
- London Borough of Southwark
- Royal Borough of Greenwich
- London Borough of Tower Hamlets
- London Borough of Bexley
- London Enterprise Panel
- Historic England
- UK Power Networks
- City Fibre
- Arquiva
- National Grid
- Hyperoptic
- Southern Gas Networks
- Thames Water
- Network Rail

## Appendix 2 – General and Other Consultees

The Government has defined General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and business interests.

The Lewisham Planning Policy database contains over 1500, groups, organisations and companies including following categories. Consultation notices were sent to these bodies alongside individuals who have signed up to the database.

- Advice and information groups
- Amenity groups
- Architects, planners and other professionals
- Black and Minority Ethnic Groups
- Builders
- Community groups
- Conservation and heritage groups
- Developers
- Disability groups
- Education/children/young people's groups
- Elderly groups
- Employment/business interests
- Environmental and ecology groups
- Faith groups
- Health organisations including NHS Trusts
- House builders
- Housing associations
- Landowners
- Police and other emergency services
- Political parties
- Regeneration groups and partnerships
- Rivers and riverside interest groups
- Shopkeepers
- Sport and leisure groups
- Statutory consultees
- Tenants and residents' associations
- Town centre partnerships
- Transport groups
- Utility companies
- Women's groups
- Youth Groups

Consultation with relevant organisations working with gypsy and travellers in Lewisham and adjoining boroughs were also consulted where they were known to us. These groups include:

- London Gypsy and Travellers Unit (LGTU)
- Lewisham Outreach Service for Gypsy and Roma Travellers
- Lewisham Traveller Forum
- The Traveller Movement
- Southwark Travellers Action Group

## Appendix 3 – Notification of Public Consultation

Claire Gray, Planning Policy Manager  
Planning Service  
Resources and Regeneration  
London Borough of Lewisham  
3<sup>rd</sup> floor, Laurence House  
Catford  
London SE6 4RU

Tel: 020 8314 7400  
[planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

Name

14<sup>th</sup> October 2016

Dear Sir or Madam

### Re: Lewisham Gypsy & Traveller Sites consultation

Lewisham Council is preparing a planning policy document called the Gypsy and Traveller Site(s) Local Plan. It will identify a site to meet the local accommodation needs of the borough's travelling community.

We have found that the travelling community needs at least six pitches in the borough over the next 15 years. Following our consultation in March/April 2016 on site search parameters and criteria for assessing sites, we are seeking feedback on two potential locations for a new residential site. Only one of these sites will be needed.

The sites we are looking at are:

- New Cross Social Club and adjoining land in Hornshay Street, New Cross, SE15 1HB
- land next to Pool Court, Catford, SE6

It's important that we get your comments and suggestions about these sites. We will take into account your views when we make our final selection.

You can comment until: **Wednesday 30 November 2016.**

### Tell us what you think

Read the consultation documents and then complete a short survey.

- *Online:* [www.lewisham.gov.uk/travellingcommunity](http://www.lewisham.gov.uk/travellingcommunity)
- *At Council's Planning Information Office:* Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 9am to 1pm, or on request during office hours)
- *At local libraries:* visit [www.lewisham.gov.uk/libraries](http://www.lewisham.gov.uk/libraries) or call 020 8314 6399 for details of library locations and opening hours.

If you prefer, you can email your comments to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) or write to:  
Claire Gray, Planning Policy Manager  
Lewisham Council, 3<sup>rd</sup> Floor Laurence House  
Catford, SE6 4RU

To be considered, your comments must include your name and an email or postal address. We want to foster good relationships between all our communities and we will not consider any consultation responses that include prejudicial or discriminatory comments or language.

If you take part in this consultation, the Council will publish your name and the content of your response, but will not publish any part of your address or contact details. We will not acknowledge receipt of your comments.

### **Find out more**

Come along to a community drop-in session. This is an opportunity to find out more about each potential site, ask questions and speak directly to council officers.

- **Catford:** Tuesday 1 November, Civic Suite, SE6 4RU  
2-4pm and 6-8pm
- **New Cross:** Thursday 3 November, All Saints Community Centre, SE14 5DJ  
2.30-6.30pm

If you have any queries please contact the planning policy team on 020 8314 7400.

Yours sincerely,

**Claire Gray**

Planning Policy Manager

### **Frequently Asked Questions**

#### Why have I received this?

Lewisham's Planning Service maintains a database of individuals and organisations that have an interest in borough planning policy. This database is continually updated and is used to inform the interested parties of consultation stages. This list is managed in accordance with the Data Protection Act 1998. Anyone wishing to be added to, or deleted from, this list should e-mail [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) or write to us at the address provided in this correspondence.

#### What is this consultation?

The process we have to follow when preparing our planning documents is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and amendments.

Regulation 18 specifies that at an early stage we should invite comments from relevant individuals and organisations on the issues the local plan should address. In March/April 2016 we identified the issues the local plan is likely to include and sought comments on the scope, site search parameters and selection criteria.

We are now carrying out a second stage of the Regulation 18 consultation to seek comments on two potential locations for a new residential site in order to meet the local accommodation needs of the borough's travelling community.

We are also consulting on an Integrated Impact Assessment which assesses the social, environmental, economic and equalities impacts of the potential sites.

## Appendix 4 - Press Notice: News Shopper

02380 424467 Newsdesk: 020 8722 6348 October 19, 2016

### LONDON BOROUGH OF LEWISHAM

**Public participation on the preparation of a local plan**

Lewisham Council is preparing a planning policy document called the Gypsy & Traveller Site(s) Local Plan. It will identify a site to meet the local accommodation needs of the borough's travelling community.

We are seeking feedback on two potential locations for a new residential site. Only one of these sites will be needed. The sites we are looking at are:

- New Cross Social Club and adjoining land in Hornshay Street, New Cross SE15 1HB
- land next to Pool Court, Catford SE6

You can comment until **Wednesday 30 November 2016**.

**Tell us what you think**

Read the consultation documents and then complete a short survey.

- Online: [www.lewisham.gov.uk/travellingcommunity](http://www.lewisham.gov.uk/travellingcommunity)
- Council's Planning Information Office: Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 9am to 1pm, or on request during office hours)
- Local libraries: visit [www.lewisham.gov.uk/libraries](http://www.lewisham.gov.uk/libraries) or call 020 8314 6399 for details of locations and opening hours.

If you prefer, you can email your comments to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) or write to: Claire Gray, Planning Policy Manager, Lewisham Council, 3rd Floor Laurence House Catford SE6 4RU

To be considered, your comments must include your name and an email or postal address. We will not consider any consultation responses that include prejudicial or discriminatory comments or language. All comments are public. We will not acknowledge receipt of your comments.


**Find out more**

Come along to a community drop-in session. This is an opportunity to find out more about each potential site, ask questions and speak directly to council officers.

- **Catford:** Tuesday 1 November, Civic Suite, SE6 4RU, 2-4pm and 6-8pm
- **New Cross:** Thursday 3 November, All Saints Community Centre, SE14 5DJ, 2.30-6.30pm

For any queries please contact the Planning Policy team on 020 8314 7400.

E. TALBOT Head of Planning,  
Laurence House, 1 Catford Road, SE6 4RU  
19th October 2016



Lewisham

## Appendix 5: List of organisations and individuals that responded

### Groups and organisations

The Wheelshunters Club; Southern Gas; National Grid; Thames Water; Natural England; Historic England; GLA; TFL; London Borough of Bexley; Environment Agency; Network Rail; Lewisham Clinical Commissioning Group; London Borough of Bromley; Enfield Council; Metropolitan Police; Lewisham Police Partnership Team; London Gypsy and Traveller Unit ; Multimac Surfaces Ltd; Outreach Service for Gypsy Roma Travellers; Phoenix Community Housing; Housing for Women; Bellingham Interagency; NXG Trust -REMEC - NX Learning – Sommerville; Bellingham Councillors; London Borough of Lewisham, Environmental Protection Team; London Borough of Lewisham, Ecology Regeneration & Open Space Policy Manager; Lovelinch Close oppose the Traveller Site; Pool Court Petition; The New Cross Gate Trust; London Borough of Lewisham Public Health.

### Individuals and others

Emma Little; Karen Smith; Trina Lynskey; Duncan Morrison; Svea Polster Broughton; Ian Duffy; Dean Houson; Graham Carter; Amy Quinn; RCKa Architects; Laura Walmsley; Din Parker; Nathan Flowers; Juliette Hart; Ben Farber; Robin Gay; Tony Urquhart; Ala Jelisejeva; S Scott; Robin Morgan; Ben Neverest; Ferenc Morath; Ian Richardson; Linda McAlister; Ben Allan; Matthew Wilson; Renie Anjeh; The oromo Peoples Liberation Front; Victoria Smith; Chris Seline; Kay Smith; Kate Atkinson; Paul Crompton; Derrick Doggs; Chloe Saad; Sean Spurr; Shayna Doing; Anna Robertson Davis; Naomi Goodman; Bianca Kent; Kathleen Ferguson; A Kennedy; Liz B; S Holman; Manny Cooke; Joyce Thrussell; Alina Tuerk; James Holland; Clare Deacon; S. Mason-Whitfield; Adam Perkins; Maria Berry; Ralph Jelbart; Jean Mullen; Culverley Green Residents Association; Jackie Bygrave; Dionne Cole; Anita Sangwa; K. Schulze; Paul Sutton; Karen Pretorius; Vienna Man; Maureen Decca; Anna Taylor; Andrew Wright; Sabrina Poma; Moira Scarlett; Richard Catford; Laura Harvey; Thom Townsend; Robin Lee-Perrella; Meryl White; Cllr. Brenda Dacres; Polly Wicks; Linda Harris; Ahmed Sami; Sonia King; Georgia Smith; Martin Quinlan; Rebecca Strang; Danniella Davies; Lorraine Hone; Van Luc; Sofia Akhazzan; Jenni Korkut; Kelly Edwards; J.H; C. Smith; G. C; Jessica Cooper; Raquel Vidal; Judith Seymour; Aimee McCorkindale; Deborah Wellard; Neil Green; Pascal Aholou; Freda Carter; Evelyn Parents Forum; Jumoke Babayomi; Daphne Cox; Sheila Browne; Enrique Perez Alvarez; Yvonne Robinson-Smith; Nicoli Smith-Farquharson; Elizabeth Dunn; Lorrene Francis; V.B; Fiona Lockwoo; Tim Hussey; Thelma Miller; Ellaoise Westwood; Pamela Martin, Queens Road Partnership Surgery; Fernando Lopez; Maria Teresa, Alvarez Louise McRae; Nik Antoniadis; Mark and Pauline Ogden; Cath James; Stephen Duckworth; Elizabeth Plant; Jo Lancaster; Magdalena Przekop; Gary Lynch; Jeffrey Worthy; Tara Ashton-Johnson; Charlotte Giddings; David Pearson; Ronnie Ridgers; David Tancred; Tania Saldanha; Fergus Grimes; Fiona McEwe; Adam McWilliams, Jenny Matthews; Jamel Nelson-Tyer; Djeneba Kouyate; Mariama Turay; Sussannah Odisae; Linda Williams; Karen Street; Public Health, Lewisham; Catherine Lawrence; Miriam Gayfer; Alan Smart; Samuel Lahai; Andrew Keats; Antonia Parkins; Kieran Gallagher; Fatemeh Wallijani; JaneRobinson; Ian Davenport; Susana Guedes; Sharon Chadwick; William Smith; Joyce Turpin; Rufine Nouteli; Titus Idun; Mrs N. Ozkan; Samantha Harewood; Richard Hayes; Hermin Delores Gayle; Kallum Duncan West; Hazel Massiah; O. Sanusi; Dean Terrelonge; Samantha West; Alicia X; Treasa Mongan; Bridget Mongan, Margaret Mongan; Mrs M. McCarthy; Maria Melsom; Elizabeth Emmanuel; Josephine Donoghue; Winnie Sweeney; Rufine Nouteli; Dan Parkes; William Edwards; Wendy Whitaker; Maedi Bohem; Sunny Abim; H. McArdle; Liz Crocker; Tanya Phillipson; Glynnis Emmerson; W.E Koch; Florence Ebeye; Guy Barzily; Janine Palmer; Debbie Aitken; Miriam Gayfer; Shontelle Williams; Scott Barkwith; Michael Street; Matt Lacey; Cynthia Davis; Theo Hawkins; Warren Keefe; Irene Byworth

## Appendix 6 - Representations received in relation to the potential New Cross Site

Please note this appendix summaries comments received from surveys and written responses. Appendix 6 contains three tables as follows:

- 1) **Table A6i:** Summary of representations received from specific and general bodies in relation to the suitability of allocating the New Cross site as a residential traveller site and proposed development guidelines.
- 2) **Table A6ii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the New Cross site is not a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.
- 3) **Table A6iii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the New Cross site is a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.

**Table A6i: Summary of representations received from specific and general bodies (New Cross)**

Consultee	Site Suitability	Summary of representation	Officer Response
Environment Agency	The suitability of the site might be hard to demonstrate.	<ul style="list-style-type: none"> <li>• It might be difficult for the applicant to demonstrate that ‘highly vulnerable’ developments, such as caravan sites, would be safe (in flood risk terms), particularly in the case of the Pool Court site which is undefended and where the available modelling doesn’t yet include the new climate change allowances.</li> <li>• Site is situated within Flood Zone 3 and considered to be ‘High Risk’ but does benefit from being defended by the Thames Tidal Defences. Proposal site situated within the 6-12 hours rate of inundation zone and described as ‘significant’ hazard with the Lewisham Strategic Flood Risk Assessment (SFRA). Development area lies within the currently modelling areas at risk of residual flooding, assuming a breach in, or overtopping, of the flood defences.</li> <li>• The EA routinely request that applicants consider the outputs of our tidal River Thames upstream inundation modelling,</li> </ul>	<p>Whilst in Flood Zone 3a, the site is protected by Thames flood defences. The site is theoretically at risk from Upstream Inundation of the Thames area in the scenario that lateral flood defences were removed and the Thames Barrier was closed. However, this is considered an unlikely scenario and in any event flood waters would take 6-12 hours to reach the site.</p> <p>Following further discussions with the Environment Agency, officers consider that there is a reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case is made and that adequate mitigation is incorporated,</p>

Page 147

<b>Table A6i: Summary of representations received from specific and general bodies (New Cross)</b>			
<b>Consultee</b>	<b>Site Suitability</b>	<b>Summary of representation</b>	<b>Officer Response</b>
		<p>where a site is located outside the extent of our tidal River Thames breach modelling, but located within the extent of our upstream inundation modelling.</p> <ul style="list-style-type: none"> <li>The Lewisham SFRA contains specific criteria for safe access and egress being situated above a Q200 year plus climate change flood level.</li> </ul>	including flood warnings
Historic England	No objection to the site stated, but matters of conservation are identified.	<ul style="list-style-type: none"> <li>Potential impact of development on the Hatcham Conservation Area should be considered.</li> <li>Site is not within an archaeological of known archaeological potential and of a limited scale. A requirement for archeological consideration of the site in the event of a planning application is not anticipated.</li> </ul>	Officers consider that a traveller site in this location would have no significant impact on the Hatcham Conservation Area (which is some distance away to the south). The Integrated Impact Assessment (October 2017) confirms this view.
Greater London Authority (GLA)	No objection to this site being allocated however re-provision of community use is necessary.	<ul style="list-style-type: none"> <li>No objection to this site being allocated for additional pitches needed to meet the needed of Gypsies and Travellers. However, if this site is chosen the Multi Use Game Area (MUGA) and the community use of the hall should be re-provided in line with London Plan policies 3.16 and 3.19.</li> </ul>	Noted. See response to comments from The Wheelshunters Club and the New Cross Gate Trust.
Lewisham Homes (Head of Housing)	General concern about challenges facing the Winslade Estate	<ul style="list-style-type: none"> <li>There are a lot of issues that we're currently dealing with on the estate around ant social behaviour, drug dealing and gang problems. We are working in close partnership with the police and LBL's crime enforcement and regulation service and have an action plan in place. Adding more potential problems to the estate might not be the best thing right now.</li> </ul>	Noted.



Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
Lewisham Police Partnership Team	No objection to the proposed site allocation, however more supportive of the Pool Court Site at this stage.	<ul style="list-style-type: none"> <li>Lewisham would at this stage be more supportive of the Pool Court site.</li> <li>Recognise the potential for discrimination against the Travelling Community and the sensitivities that the local community may have in both areas shortlisted.</li> </ul>	Noted.
London Borough of Bexley	No objection to the site stated.	<ul style="list-style-type: none"> <li>Support an approach whereby each local planning authority in the southeast London sub-region seeks to meet its own need.</li> <li>LB Bexley does not have any capacity to provide pitches for Lewisham's identified need in the event that neither of the proposed sites can be delivered.</li> </ul>	Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.
London Borough of Bromley	No objection to the site stated.	<ul style="list-style-type: none"> <li>Response to the Lewisham Gypsy and Traveller Accommodation Assessment.</li> <li>Para 3.6 - Traveller Definitions: Information from ORS study suggests that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the majority will need to be addressed through the SHMA.</li> <li>Paras 4.5 and Paras 5.10 - 5.11 - Interviews with Travellers in Bricks &amp; Mortar: Bromley has engaged with the support worker in relation to the needs of travellers with Lewisham connections (family / Lewisham Traveller Group) currently in bricks and mortar accommodation in neighbouring boroughs, who would be interested in pitches in SE London.</li> </ul>	<p>Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.</p> <p>Officers consider that the assessment that there is a lack of need for plots for travelling show people is reasonable and will continue to address wider sub-regional traveller and show people needs, including the need for transit sites, through Duty to Co Operate discussions with neighbouring boroughs.</p>

**Table A6i: Summary of representations received from specific and general bodies (New Cross)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li data-bbox="667 309 1518 469">• The Pitch Needs - “Non-Lewisham” Gypsies and Travellers section deals with travellers with an historical link to Lewisham currently residing in bricks and mortar outside the Borough. It suggests that “The Council should work with neighbouring authorities to consider their accommodation needs”.</li> <li data-bbox="667 512 1518 775">• Bromley considers the needs of those on its waiting list, provides a realistic understanding of families who have an evidenced desire to locate on Bromley pitches although waiting list application alone is not necessarily proof of need or confirmation that the applicants meet the new definition. Lewisham currently has no authorised sites, however, once Lewisham opens a site/s, a waiting list may attract applications from these families in brick and mortar with links to Lewisham.</li> <li data-bbox="667 818 1518 1153">• Paras 5.12 – 5.14 Travelling Show Persons Accommodation: The zero requirement for Travelling Show people, (from the main 2015 Lewisham GTAA) is determined on the basis that there are currently no yards in Lewisham and the view of a representative of the Showman’s Guild of Great Britain that they would be looking at existing yards and surrounding land (presumably in Bromley) as “this would be less onerous than seeking new land for yards.” This is a circular argument with the lack of an allocation (making new yards onerous) being used to justify the zero allocation.</li> <li data-bbox="667 1197 1518 1385">• Transit Provision: The GTAA does not recommend that Lewisham Council consider any transit provision on the basis that there were “only 18 unauthorised encampments from April 2015 - early 2016. This number of incursions is of a similar order to that experienced by Bromley. Bromley’s Proposed Submission Draft Local Plan (2016) draft Policy 12 indicates</li> </ul>	

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		that, with regard to transit pitches, “the Council will work with the sub region to secure their provision in an appropriate location within the sub region”. Such work will be undertaken mindful of the numbers of incursions experienced by boroughs and the sub regional provision for Travelling Show people that Bromley already provides.	
London Borough of Enfield	No objection to the proposed site allocation stated.	<ul style="list-style-type: none"> <li>Given the physical distance between boroughs, the delivery of new pitches in Lewisham would be unlikely to impact on Enfield.</li> </ul>	Noted.
London Gypsy Traveller Unit (LGTU)	No objection to the proposed site allocation stated.	<ul style="list-style-type: none"> <li>Both proposed site allocations suitable for the accommodation of the 6 pitches needed. However, there are constraints for each of the sites that have to be mitigated and it is therefore too early to choose a preferred option.</li> <li>Need to develop a clear plan on how the Multi Use Games Area and social club will be relocated to a suitable, accessible and convenient location so as to ensure there won't be any loss of social infrastructure. The next iteration of the plan should set out the clear phases of delivery of both the Gypsy and Traveller site and the relocation of these facilities.</li> <li>The fact that the site is in the council's ownership is an advantage.</li> </ul>	<p>Further investigations have taken place in relation to the Multi Use Games Area. See response to the New Cross Gate Trust.</p> <p>In terms of the loss of the existing Social Club building, please see response to the Wheelshunters Club.</p>
National Grid	No objection to the proposed site	<ul style="list-style-type: none"> <li>National Grid has no comments to make in response to this consultation.</li> </ul>	Noted.

Page 151

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
	allocation stated.		
Natural England	No objection to the proposed site allocation stated.	<ul style="list-style-type: none"> <li>Natural England has no comments</li> </ul>	Noted.
Network Rail	In principle Network Rail has no objection to the designation of the site	<ul style="list-style-type: none"> <li>Site is located adjacent to Network Rail's Operational Assets and Infrastructure the council will need to be aware of and consider Network Rail's standard asset protection guidelines and requirements when developing the site.</li> </ul>	Noted.
New Cross Gate Trust	Strong objection to the proposed allocation.	<ul style="list-style-type: none"> <li>Very much object to the site being allocated as a Gypsy and Traveller site – this is a very deprived neighbourhood, already struggling with issues of violent crime, social cohesion, lack of facilities, contamination, and antisocial behaviour. Very unfair to add another challenge to the residents of the estate.</li> </ul> <p>Concentration of Sites</p> <ul style="list-style-type: none"> <li>Existing high concentration of traveller sites in the local area with 5 in close proximity within the LB Southwark</li> <li>Concentration of community with distinct needs within a limited area will have particular impacts on local services and infrastructure, such as schools and infrastructure (open spaces - from activities such as horse-riding)</li> </ul> <p>Access</p> <ul style="list-style-type: none"> <li>If nearby entrance to the estate is closed this would generate access issues with the caravans having to access the site through the estate via the other entrance to the north. Implications: unacceptable risks concerning health and safety with regards to heavy vehicles going through the estate.</li> <li>Loss of existing local businesses which operate along this section of the road</li> </ul>	<p>Concentration of sites</p> <p>The issue was raised by a number of individuals during consultation on the draft Search Parameters and Site Selection Criteria. However, in July 2016, the Mayor and Cabinet accepted officer's response that given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, an 'exclusion zone' was not appropriate. Such a restriction would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources is unsubstantiated.</p> <p>Access</p> <p>Access to and from the site would be via Hornshay Street and there should be no need to use roads on the Winslade Estate (N.B. Lewisham Homes has introduced a gate to the southern end of Lovelinch Close and Sharrat Street as part of wider</p>

**Table A6i: Summary of representations received from specific and general bodies (New Cross)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Loss of Community Facilities</p> <ul style="list-style-type: none"> <li>• Ballcourt – only facility available to residents on the estate. Ballcourt created through NDC funding to regenerate the end of the estate, and the land was given over for this purpose.</li> <li>• Not acceptable to remove the MUGA – very well used and needed resource.</li> <li>• Promises to ‘improve existing facilities’ – inappropriate as there are no existing facilities</li> <li>• Consequence: very negative impact on the physical health of the community and on social inclusion, as the community will lose two valuable resources (ballcourt and the social club), as places where people can meet and socialise. No alternatives – Scotney Hall currently unusable due to repairs</li> </ul> <p>Relocation of Ballcourt/MUGA</p> <ul style="list-style-type: none"> <li>• Claims that the ballcourt will be re-provided elsewhere are insufficient, as there are no proposals of where replacement will be.</li> <li>• Any replacement provision is unlikely to be close to the estate</li> <li>• Relocation to Bridgehouse Meadows would be unacceptable – it would get less use and there would be no natural surveillance for the young people using it</li> </ul> <p>Trees/Landscaping</p> <ul style="list-style-type: none"> <li>• No mention of type of trees which would be planted. Incredibly important. Height, coniferous/deciduous, growth speed, maintenance, impact of roots etc, all need to take into consideration.</li> <li>• Trees should surround the site not just planted along one bit of road</li> </ul>	<p>traffic management arrangements for the Estate designed to tackle anti-social behavior). Proposals should not directly impact on existing businesses.</p> <p>Loss of MUGA The Potential Sites Consultation Report made clear that mitigation for the loss of the existing MUGA would be required by way of improvements to an existing facility or a replacement facility. Officers have commissioned a feasibility study in to providing replacement facilities on a garage and hardstanding area adjacent to Upnall House, directly opposite the potential site on the north side of Hornshay Street. The study finds that this space could provide 1 multi-use games area and a team area of approx.407sqm or a multi-use games area and separate informal basketball practice area of approx.323sqm. Whilst these options would mean that there would be a significant net loss of games space, it would enable replacement smaller facilities to be provided in the immediate area. Officers consider that facilitating the provision of a traveller site could represent special circumstances that justify such a loss of space.</p> <p>Officers have also commissioned a</p>

**Table A6i: Summary of representations received from specific and general bodies (New Cross)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Consultation Methods</p> <ul style="list-style-type: none"> <li>• Appropriate consultation methods not applied. None of the residents on the estate or surrounding area were aware of the proposals in the earlier stages, and we are only just being informed at the very last stage of site selection.</li> </ul> <p>Integrated Impact Assessment</p> <ul style="list-style-type: none"> <li>• Completely insufficient. To have table 4.2 presented as simply a tick box exercise suggests that planners have not even visited the site, spoken to local people, or spent any time understanding the use of the area. Many of the comments are based on flimsy asserts as opposed to proper, rigorous investigation of the likely impact.</li> <li>• Challenge assertions in point 9 (likely to remove flora and fauna elsewhere to replace the MUGA), point 6, point 8, point 11, point 13, point 14, point 15.</li> <li>• Point 5 needs more consideration and a perspective provided by local police.</li> <li>• All of these points could be challenged, and will be incredibly dependent on the care with which this policy is implemented</li> </ul> <p>Shontelle Williams Report</p> <ul style="list-style-type: none"> <li>• Points raised in detailed report produced by Shontelle Williams are endorsed by the New Cross Gate Trust</li> </ul>	<p>masterplan capacity study for this potential site. This suggests that it would be possible to provide 6 pitches whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement larger kick-about area provided on land at Upnall House, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The masterplan capacity study also identifies an option of providing 6 pitches with individual vehicular accesses and replacement MUGA and games court area on the site of the existing Social Club car park that may be able to retain all facilities and avoid any net loss in space.</p> <p>Whilst there has been some discussion with Lewisham Homes about the Upnall House option, there has been no consultation with local residents or users of the existing games courts about this or the masterplan capacity study. This would take place if this potential site was chosen to go forward.</p> <p>Loss of Social Club See response to the Wheelshunters Club.</p> <p>Trees/Landscaping</p>

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
			<p>Details of tree planting would be considered in detail if this potential site went forward.</p> <p>Consultation methods Consultation can always be better. However, officers consider that high quality consultation took place in accordance with the relevant regulations and the Council's Statement of Community Involvement.</p> <p>Integrated Impact Assessment The updated Integrated Impact Assessment (October 2017) takes account of these and other comments and officers consider that it provides an adequate assessment of the two potential sites.</p>
New Cross Learning	Object to proposed site allocation	<ul style="list-style-type: none"> <li>Object to New Cross site.</li> <li>Would deprive Winslade Estate of one of the few facilities for young people and social/community area for residents on the estate.</li> <li>Must be an alternative location for a Gypsy and Traveller site within Lewisham.</li> </ul>	Noted – see responses to the New Cross Gate Trust and the Wheelshunters Club.
NHS Lewisham Clinical Commissioning Group	No objected to the proposed site allocation stated	Lewisham CCG feel that the impact on health services in the area would be minimal.	Noted.
Outreach	No objected to the	<ul style="list-style-type: none"> <li>Both proposed site locations appear to be of a suitable size to</li> </ul>	Noted - see responses to the New Cross

<b>Table A6i: Summary of representations received from specific and general bodies (New Cross)</b>			
<b>Consultee</b>	<b>Site Suitability</b>	<b>Summary of representation</b>	<b>Officer Response</b>
service for Gypsy and Roma Travellers, Lewisham Irish Community Centre	proposed site allocation stated, however a number of issues are raised.	<p>accommodate the 6 pitches needed. There are advantages and disadvantages to each of the proposed site locations.</p> <ul style="list-style-type: none"> <li>• Very few of the Travellers currently residing in Lewisham are living in and around New Cross, which is very built up, and is close to a regeneration area in the adjoining borough. This regeneration programme is liable to increase population density, making the area less suitable for a Traveller site. There are also two existing Traveller sites run by Southwark council very close to Lewisham's proposed New Cross site.</li> <li>• The potential loss of existing social infrastructure (the social club and games area) from the location could be best addressed by the council if a clear plan to relocate both facilities to suitable and accessible locations could be made and delivered before the council makes a final decision.</li> <li>• The next iteration of the plan should set out the clear phases of delivery of both the Gypsy and Traveller site and the relocation of these facilities. Any loss (or too distant re-location) of existing facilities would impair relationships between the existing local community and those who may move onto a new site located there.</li> <li>• The fact that the site is in the council's ownership is an advantage in terms of potential planning applications and financially, as no land would need to be purchased.</li> </ul>	Gate Trust and the Wheelshunters Club.
Queens Road Partnership Surgery	Object to the proposed site allocation.	<ul style="list-style-type: none"> <li>• Site unsuitable due to removal of space young local people can use for sports in an area (Winslade Estate) where there are few recreational opportunities.</li> </ul>	Noted - see response to the New Cross Gate Trust.
REM Educational	Object to the proposed site	<ul style="list-style-type: none"> <li>• Object to the location of the travellers site on Winslade Estate. There are no other facility outlets for the people in this area of</li> </ul>	Noted - see responses to the New Cross Gate Trust and the Wheelshunters Club.



<b>Table A6i: Summary of representations received from specific and general bodies (New Cross)</b>			
Consultee	Site Suitability	Summary of representation	Officer Response
Centre	allocation	<p>North Lewisham. Only other community outlet in area, Scotney Hall, has been out of action for over two years and repairs are taking their time.</p> <ul style="list-style-type: none"> <li>• MUGA sports pen specifically constructed for children and young people in the area as a place where they could go and let off steam in a healthy and constructive way. It is well used.</li> </ul>	
Sommerville Youth and Play Provision	Object to the proposed site allocation	<ul style="list-style-type: none"> <li>• Object to the New Cross Site</li> </ul>	Noted.
Southern Gas Network	No objection to the proposed site allocation	<ul style="list-style-type: none"> <li>• Presence of various large diameter gas mains within the access area to both of the planned sites. The large diameter gas mains are located in the public highway.</li> <li>• These mains are 630mm / 48" in diameter and access to our plant would be needed 24/7m. Any impingement to our plant could cause us severe operational issues to our gas distribution network.</li> <li>• From safety point of view any bonfires, near our plant would be of concern.</li> </ul>	Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.
The Wheelshunters Club	Object to the proposed site allocation	<ul style="list-style-type: none"> <li>• Wheelshunters Social Club – over 200 members.</li> <li>• Family friendly club supplying the local community with a meeting place.</li> <li>• Location close to Millwall football ground provides supporters with a safe and friendly meeting point before and after matches.</li> </ul>	The Social Club is a licensed bar and hall providing live entertainment and is open to hire for events (weddings etc.). It is also used by a local church for meetings. The building includes a residential flat. The loss of the Social Club and housing without mitigation would be against policy. However, this needs to be balanced against Core Strategy Policy 2 which makes clear that the Council will assess

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>Manned carpark provides secure parking so people with young children can feel safe attending the match.</li> <li>Club has large function room with space for different events for different local groups and organisations, including the local travelling community</li> <li>Also provide the use of 2 football pitches for the youths of the area</li> <li>Staff working at the club would lose their jobs</li> <li>A family who live above would need rehousing</li> <li>Existing travellers site at the bottom of Ilderton Road near South Bermondsey Station, another behind Toys R Us, Old Kent Road, and near New Cross Gate. Area already services the travelling community and adding another site will (disproportionately) increase the presence of one type of community within the area –and impacting on the ability to maintain good relations within the community</li> <li>Supporting documents don't show what going concerns are already doing for the local area</li> </ul>	<p>and provide for the identified needs of the gypsy and traveller community. Officers consider that facilitating the provision of a traveller site (which would result in a net gain of residential accommodation) could represent special circumstances that justify the loss of the Social Club and existing residential flat.</p> <p>During a stakeholder meeting, the current tenants (the Wheelshunters Club) asked whether there would be an opportunity for them to get involved in the redevelopment of Scotney Hall on Sharratt Street. The Hall re-opened at the end of April 2017 following refurbishment. It may be able to accommodate some of the functions currently offered by the Social Club (e.g. weddings), but officers do not consider that this would be a suitable location for a licensed private members club. The Council could provide the Wheelshunters Club with the maximum notice possible to vacate the premises and assist it suitable alternative accommodation in the area.</p>
Thames Water	No objection stated.	<ul style="list-style-type: none"> <li>For Thames Water to comment on the sewerage requirements of the sites being considered and the impact on existing systems an indication of the location and number of pitches proposed, would be necessary. However, in very general terms for the small number of new units proposed Thames Water don't expect any major concerns.</li> </ul>	Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>In the absence of sewers within the vicinity, the developer of the accommodation will be required to make provision for wastewater services either, after consultation with Thames Water, lay a sewer (at his/her own expense) from the site to an appropriate and agreed connection point on the public sewerage network and offer this for adoption or make some form of onsite provision to the disposal of wastewater, septic tank for example.</li> </ul>	
Transport for London (TFL)	No objection stated.	<ul style="list-style-type: none"> <li>This site does not raise any strategic transport issues</li> </ul>	Noted.

Page 159

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Site size, capacity & location	<ul style="list-style-type: none"> <li>Unsuitable due to size. The site is not sufficient for what is proposed.</li> <li>Traveller families have larger families than average and so need large sites wherever possible</li> <li>The site at New Cross will only provide pitches for the travelling community of 400sqm. At the Pool Site these will be a much larger 500sqm, providing more space and a nicer living environment.</li> <li>The area is densely populated and in an area of rapid population growth. Too add more people is out of the question. The site is too close to flats and in the middle of too many people.</li> <li>There are several other traveller sites nearby and there is enough in</li> </ul>	<p>The potential site has been identified as 'Good' for six of the relevant Site Selection Criteria and 'Average' for the remaining three and officers consider that it is suitable. The draft Masterplan Capacity study demonstrates that the potential site could accommodate at least six traveller pitches.</p> <p>The issue of proximity to existing traveller sites was raised by a number of individuals during consultation on the draft Search Parameters and Site Selection Criteria. However, in July 2016, the Mayor and Cabinet accepted officer's</p>

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>this area</p> <ul style="list-style-type: none"> <li>• The site could be developed to provide housing to meet Lewisham Council's housing need as well as re-providing social infrastructure / This site could house a significant amount of people / The site is better suited to high density housing to meet the boroughs acute housing need.</li> <li>• This is a Zone 2 area of London which is meant to be earmarked for regeneration</li> <li>• Lewisham should be reacting to Southwark's Old Kent Road Masterplan by creating their own masterplan for Lewisham's land in this area including this site, which should be focused on providing as many homes as possible.</li> </ul>	<p>response that given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, an 'exclusion zone' was not appropriate. Such a restriction would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources is unsubstantiated (see Table 8 in the main part of the Consultation Statement).</p> <p>The Metropolitan Police recognise the concerns raised by some travellers about the fear of intimidation from travellers living in Southwark and is more supportive of the Pool Court site. Officers too accept that these fears are genuine. However, a site would not be provided for individuals but for the Lewisham traveler community. Suitable pitch allocation and management arrangements would enable those people with a Lewisham connection who wanted to live on a site to apply and pitches would be allocated based on housing need.</p> <p>Officers acknowledge that the potential site is within the Regeneration and Growth Area (as defined in the Council's Core Strategy) and is in the London Plan Lewisham, Catford and New Cross Opportunity area and adjacent to the London Plan Old Kent Road Opportunity Area.</p>
Physical and social integration	<ul style="list-style-type: none"> <li>• The site is too far from my family</li> <li>• The site is unsuitable for resettlement as the traveler community would need to be closer to the countryside in order to live more accordingly with their tradition</li> <li>• The community centre and sports / games have been placed there to encourage participation and community engagement and to lose</li> </ul>	<p>See response to New Cross Trust above (Table A6i) in relation to loss of the MUGA.</p> <p>See response on impact on an area of deprivation (below) in relation to social integration.</p>

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>them would be a terrible loss to the community. Every time I pass the games areas on my bike, I see people playing, I think the value of playing and keeping people exercising is key to community development.</p> <ul style="list-style-type: none"> <li>• My experience with travellers is that they want to keep separate and they wouldn't integrate</li> <li>• The visible use of both the games area and the social hall creates a real sense of community, and makes life on the estate more pleasant than it would be without these facilities. It is nice to see people enjoying themselves in the area</li> </ul>	
Impact on area of deprivation	<ul style="list-style-type: none"> <li>• In a low-income area where involvement is restricted by cost, outdoors spaces that are free to use and close enough to home to allow children to use them regularly are especially important. There is not a huge amount to keep people entertained.</li> <li>• There will be a very negative impact on health / childhood obesity. The ballcourt is the only facility available to residents on the estate.</li> <li>• This is a very bad idea you cannot take from one deprived community to give to another.</li> <li>• New Cross remains the dumping ground for many of the boroughs problems and we never hear any plans from Lewisham Council about how they intend to regenerate New Cross</li> <li>• I object to this site being used for Travellers because this area needs a lot of money spending on it to improve it.</li> <li>• It is inappropriate to bring a site to an estate that has already so many issues going on and which are not being sorted out. Before the Council thinks of anything, it should deal with what is at hand first</li> <li>• This area of the borough already feels forgotten and lacking in facilities. There are innate issues with the area and this will compound those views by removing what little facilities they have.</li> </ul>	<p>See response to New Cross Gate Trust (Table A6i).</p> <p>New Cross is the second most deprived Ward in Lewisham and is within the 20% most deprived neighbourhoods (Lower Layer Super Output Areas) in the country.</p> <p>Introducing a traveller site here would pose challenges to creating and maintaining a mixed and balanced community in the wider neighbourhood. If this site were to be chosen, the Council and its partners would need to strengthen their efforts to increase the capacity and resilience of local communities. In addition, officers recommend that the Outreach Worker facilitates meetings between local residents and members of the Lewisham traveller community to build understanding and community cohesion during the detailed design, planning stages and beyond.</p>

Page 161

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Services & infrastructure	<ul style="list-style-type: none"> <li>Schools are overflowing/packed and there's no space and the doctor's surgery most people use is the Queens Road partnership surgery and it is full up.</li> </ul>	<p>The traveller community does have particular needs around education and health and faces particular challenges in accessing health, education and other services. Officers have engaged with the Council's School Places Manager and NHS Lewisham Clinical Commissioning Group (CCG) at all stages of the process. The CCG has responded to the latest consultation stating that it considers that the impact on health services would be minimal for either site.</p> <p>Officers do not envisage that the population generated by the provision of a site (circa 20-25 people) would add undue pressure on local infrastructure or services. However, it is recommended that liaison takes place with local schools and GP surgeries once a preferred site is known to enable them to make any adjustments to service provision that may be necessary in advance of a site being first occupied.</p>
Concentration of travellers sites	<ul style="list-style-type: none"> <li>The site is too close to the Southwark sites and local people will be full of complaints about the travelers.</li> <li>One area is taking the responsibility for all travellers sites and there should be an equal integration across the area. Gypsy &amp; Traveller families should not be forced to live in a very limited geographical area. It makes it more difficult to house families separately for example if there was a domestic violence or intimidation issue.</li> <li>We do not think that LB Lewisham has fulfilled its duty to cooperate with LB Southwark on the development of this local plan, or Lewisham would be aware of this overconcentration, and the impact that this is likely to have on local schools and other services.</li> <li>During the consultation on 3 November 2016 it was stated that all travellers site must be 3 miles from each other.</li> <li>I don't feel we [travellers] would be welcome at the site.</li> </ul>	See response to New Cross Gate Trust in Table A61.

**Table A6ii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters**

Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Parking, access and highways	<ul style="list-style-type: none"> <li>• The allocation would exacerbate existing problems: parked and abandoned cars, pressure on public transport, access for emergency vehicles, parking issues on the Winslade Estate.</li> <li>• Travellers will park their vans everywhere.</li> <li>• There will be access issues: due to mechanics working at the end of the road, smashed and untaxed cars continuously dumped in front of social club along with the surrounding areas and with the caravans having to access the site through the Winslade Estate from the other entrance to the north.</li> <li>• There is [in]adequate width for caravans and emergency vehicles. Ilderton Road is a very busy inter-connecting road and there could be traffic problems resulting from position of this site.</li> <li>• There is also extensive development underway in the area around Grinstead Road/ Folkestone Gardens/ Trundleys Road, Evelyn Street/ Oxestalls Road and Canada Water placing pressure on the highways.</li> </ul>	<p>Concerns about abandoned cars are noted.</p> <p>The Highway and Access Feasibility Report (October 2016) tested vehicular access and turning space requirements for an occasional delivery of a large mobile home to a site (18.5m vehicles, which are longer than a fire engine). The study found that this was achievable, but noted that parking restrictions would need to be introduced opposite an entrance (likely to displace 6 kerb-side spaces) and that large vehicles would need to be guided in and out of a site.</p> <p>The above would result in some loss of kerb-side parking opportunities, as referred to above, but this would be partly off-set by closing the existing vehicular access to the Social Club car parking – so the net loss is likely to be in the order of 4 to 6 spaces.</p>
Amenity & Environmental Quality	<ul style="list-style-type: none"> <li>• The area is densely populated and would be too close to nearby housing.</li> <li>• When travellers left a nearby site at a mountain of refuse was left on the site</li> <li>• Bigger boys will start playing football outside Upnall house again making a terrible racket and destroy gardens with their footballs again.</li> <li>• The whole area and Lovelinch Close will look very rough.</li> <li>• In future there will be more noise (especially in the evenings), smoke and fire from burnt wood, rubbish, BBQs etc. There will be a negative effect of the site on local environmental quality (noise, air quality) and on the health and wellbeing of people.</li> <li>• There are already noise issues on the meadows who use the space to ride motorbikes and quad bikes, by housing them next to the</li> </ul>	<p>The potential site is between approx. 13 and 18m to the south of Saltwood House (a four-storey block of flats that looks directly on to the site) and approx. 22m to the south of Upnall House (a four-storey block of flats that presents a blank flank wall to the site).</p> <p>There are many streets in London where homes face each other across a street that is 13m wide. In this case, pitches would contain single-storey caravans/small buildings and homes in Saltwood house would look down on them. The site-specific guidance included in the Potential Sites Consultation Report calls for a boundary treatment that protects the privacy of residents living on the site and tree planting to improve the street scene. With these things in place, the privacy of existing residents of Saltwood House</p>

Page 163

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>meadows will only make the noise issues worse</p> <ul style="list-style-type: none"> <li>Creates fly tipping issues / There is a very bad dumping issue locally which Lewisham are already failing to control and this will get worse if travellers are allowed to be sited in the area</li> </ul>	and future residents of a site should be safeguarded.
Flood Risk & Water Management	<ul style="list-style-type: none"> <li>How would flood issues be dealt with?</li> </ul>	See response to the Environment Agency (Table A6i).
Safety	<ul style="list-style-type: none"> <li>There is a risk of greater anti-social behavior and there are issues of existing anti-social behaviour on the estate, creating more pressure on an already stretched police force and making the site less appealing to local residents</li> <li>The existing MUGA location is a safe location for children to play</li> <li>The Council could better meet its legal requirements by co-working with neighbouring boroughs to share cost and enable a single unified site which can be securely policed.</li> <li>Add multiple CCTV to any site.</li> <li>New Cross suffers from a high threat of violent and knife crime and attacks are often indiscriminate. If the site is to be chosen for residential use, the occupiers should be provided with safety advice on how to make their buildings/homes secure and safe from violent attacks.</li> <li>Some Travellers cause crime and the wider community are justifiably afraid of such settlements</li> <li>If the site is taken over we will be on streets where we teenagers are more likely to cause problems due to boredom etc.</li> <li>The Traveller presence in new Cross has already been massively detrimental during the illegal squats next to New Cross Gate station. I think New Cross has already had enough and built up a huge reservoir of resentment.</li> </ul>	Officers acknowledge existing issues relating to anti-social behavior and that the existing MUGA is well located to provide facilities for older children and young adults living on the Winslade Estate.

Page 164



Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Loss of social club & housing unit	<ul style="list-style-type: none"> <li>• The social club is used by older people and there isn't anything for them to do and would therefore be a loss.</li> <li>• The Wheelshunters Club has been used for some community occasions and its replacement would be a loss of amenities. The club is already occupied and used for multiple public/community purposes, by various ethnic groups, ages.</li> <li>• I do not think the wider community should lose facilities without a clear solution for replacement. Displacement of current facilities should be a higher priority</li> <li>• The site forms a valuable recreational space within the community which allows for a number of users to play sports, watch gigs and engage in social activities with the New Cross area. These spaces form vital parts of the area and contribute to community building and overall health and happiness of residents in the area</li> <li>• No information is provided to explain the impact of losing the social club for the community.</li> <li>• As a working club [Wheelshunters] we have staff that would lose their jobs and a family who live above who would need rehoming. We also have a large function room which officers a space for all different types of events from birthday parties, christenings to charity events &amp; churches of which we have 3 &amp; a Sunday school. We offer a space for a lot of organisations. We also offer the hall to the travelling community as they often get turned away due to people discriminating against them. We have an over 50s club who meet regularly</li> </ul>	See response to the Wheelshunters Club (Table A6i)

**Table A6ii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters**

Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Loss of multi-use games area (MUGA)	<ul style="list-style-type: none"> <li>• The loss of the MUGA is a loss on amenities for young people who do not have many facilities. This is something that teenagers use. There is only a play area for small kids and kids in the area need somewhere to play</li> <li>• Young people need better or more facilities not removal</li> <li>• A replacement area would be a long walk away as there is nothing nearby.</li> <li>• How can you justify pulling down these facilities when it took 9 years to complete the MUGA? We have nowhere for our kids to go and play in a safe environment.</li> <li>• Before the football pen was built, kids played football outside Lewis Silken House against the shutters disturbing residents. Relocating the MUGA will lead to trouble as the children and teenagers will become bored</li> <li>• [Travellers] Don't want to disturb the housed community by taking down their club and football pens</li> <li>• More information is needed about the current usage of the Multi Use Games Area and Social Club</li> <li>• There are limited spaces on the estate for other children and teenagers to meet, chat and play sport together.</li> <li>• It is a valued and well used facility for the estate</li> <li>• It is a focal point for the community bringing tangible social and health benefits</li> <li>• The existing location is close enough to home that children can go there themselves. Other sports areas are further away and would require crossing major roads (e.g., Old Kent Road), and realistically would require parental supervision to get there</li> <li>• From a development perspective, it is important for them to have space to develop independence, such as taking short journeys by themselves and playing unsupervised.</li> </ul>	See response to New Cross Gate Trust (Table A6i).

Page 166

**Table A6ii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters**

Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<ul style="list-style-type: none"> <li>• The MUGA prevents issues with ball games on the estate which create noise and disturbance such as broken windows.</li> <li>• The loss of the MUGA would deprive existing residents of opportunities for social and physical interaction</li> <li>• I see that the loss of the games fields could be mitigated with the development of another area, yet people are happy using that one, they go to that one, to suggest building another one seems ridiculous and would undoubtedly not be as convenient.</li> <li>• The integrated impact assessment itself notes the potentially negative impact that the loss of the community hall and sports facilities could have on social inclusion, community infrastructure and the health of local residents.</li> <li>• If you remove these you will only divide an already unsettled community.</li> </ul>	
Ownership & Deliverability	<ul style="list-style-type: none"> <li>• It is understood by residents that there is a 25-year lease for the Multi Use Games Area</li> <li>• It is an inefficient use of public funds to demolish and relocated existing communities</li> <li>• While the consultation documents state that alternatives to the Social Club and MUGA may be provided at the proposed Surrey Canal Triangle development, relying on private developers to provide alternative facilities seems like a risky strategy.</li> </ul>	<p>The freehold of the site is owned by the Council. The New Cross Social Working Men’s Club initially had a 60-year lease of the whole site (up to January 2034). The land now occupied by the MUGA was surrendered to the Council in 2006, to allow for the MUGA to be built in consideration of the rent under the lease being reduced. In 2010, the Council granted a one year to the Wheelshunters Club to stay in the Social Club building. However, the initial 60-year lease was not terminated and remains in place. The Council will need to regularise the lease situation by taking appropriate steps to terminate this lease. The Wheelshunters Club also remains in occupation of the Social Club building and this occupational arrangement would need to be terminated.</p>
Biodiversity	<p>The idea that planting more trees in a small area already crowded is not workable</p>	<p>Officers consider that some tree planting along the Hornshay Street boundary could be possible.</p>

Page 167

**Table A6ii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters**

Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Other matters	<ul style="list-style-type: none"> <li>• This is not the best use of council tax.</li> <li>• Unfortunately, travellers near a property decline the value of properties and as a private property owner that is a major concern to me.</li> <li>• We also think that appropriate consultation methods have not been applied. None of the residents on the estate or surrounding area were aware of the proposals in the earlier stages, and we are only just being informed at the very last stage of site selection</li> <li>• It would be good to have more information on the plan for residents. For example: Will the site be open to the residence in the local area which are currently facing a housing shortage</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Property value is not a material planning consideration.</li> <li>• Consultation can always be better. However, officers consider that high quality consultation took place in accordance with the relevant regulations and Council’s Statement of Community Involvement.</li> <li>• Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a ‘local connection’ with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified.</li> <li>• The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site, establishing a flood evacuation plan and managing potential anti-social behaviour (such as burning off material).</li> </ul>

Page 168

**Table A6iii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters**

Planning Matter	Summary	Officer Response
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Table A6iii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Site size, capacity & location	<ul style="list-style-type: none"> <li>• It is located away from other housing / less built up</li> <li>• Site is more open / has the best space</li> <li>• The land is already built on</li> <li>• More central location</li> <li>• Proximity to other traveller sites / There are already travelers in the community and would improve traveller community</li> <li>• I believe the Traveller community should decide. I have never been asked about where any other community should live.</li> <li>• The new cross land seems to give the travellers the requirements found within the consultation document without material impact to the families</li> <li>• There are already travelers in the community and would improve traveller community</li> </ul>	Noted. See responses to 'site size/capacity' and 'location' in Table A6ii.
Parking, access & highways	<ul style="list-style-type: none"> <li>• Good access to main road network</li> <li>• Better access to public transport</li> <li>• Option for two entrances</li> <li>• Access from main roads an advantage</li> </ul>	Noted. See response to 'highway impact including parking' in Table A6ii.
Ownership & Delivery	<ul style="list-style-type: none"> <li>• Low cost option as it is cheaper to deliver as the land is already owned by the Council / There is no requirement to purchase land as this site is owned by Lewisham Council</li> <li>• The land is currently vacant which avoids a large obstacle / no one needs to be moved</li> <li>• The new cross site is away from local housing which is likely to cause less disruption or complaints from local residents during the process.</li> <li>• The site is long due for redevelopment</li> </ul>	Noted. See response on ownership and deliverability issues in Table A6ii.
Safety	<ul style="list-style-type: none"> <li>• Safer site for occupants</li> </ul>	Noted.

Page 169

Table A6iii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Flood Risk & water management	<ul style="list-style-type: none"> <li>• Low flood risk / not liable to flooding</li> <li>• Lower risk of pollution to water courses / located away from water courses</li> <li>•</li> </ul>	Noted.
Impact on services and facilities	<ul style="list-style-type: none"> <li>• Good access to local facilities and employment activities</li> <li>• Ideal site area for travelling community with access to confluence areas; transport hubs and local amenities</li> <li>• It has the best space and facilities.</li> <li>• I feel with the source of schools and other facilities it would an ideal site for the traveller to settle.</li> </ul>	Noted.
Loss of community facilities	<ul style="list-style-type: none"> <li>• The loss of community facilities is not significant as there are other sports pitches next to Aldi and the club is not always in use and there is noise and disruption from the existing club / I feel it is suitable as the club is always empty and only open 2 days a week</li> <li>• MUGA could be redeveloped with improved facilities nearby</li> <li>• It is not located on open space / there is no loss of open space</li> <li>• The social club has been hired out every Friday and Saturday night with loud music, disruption, including vandals, fights and as such its loss would not necessarily be negative.</li> </ul>	Noted. See responses to 'loss of social club' and 'loss of multi-use games area (MUGA)' in Table 11.
Biodiversity	<ul style="list-style-type: none"> <li>• This location does not contain any of the borough's open spaces and there would not be a loss of open space.</li> <li>• As tree planting is planned around the site, locating the Travellers site here would increase the amount of greenery in the borough.</li> <li>• It does not have any environmental protections and is therefore a better option</li> <li>• The land is already a building so seems suitable for conversion</li> </ul>	Noted.

Page 170

<b>Table A6iii Summary of matters raised by individuals as to why the New Cross site <u>is</u> not a suitable site and other matters</b>		
<b>Planning Matter</b>	<b>Summary</b>	<b>Officer Response</b>
Amenity	<ul style="list-style-type: none"> <li>• Is away from housing and water courses where pollution might be an issue</li> </ul>	Noted
Other	<ul style="list-style-type: none"> <li>• The traveller community needs the provision of such sites.</li> <li>• It is important for the council to make provision for our travelling community.</li> </ul>	Noted.

## Appendix 7 - Representations received in relation to the potential Pool Court Site.

Please note this appendix summaries comments received from surveys and written responses. Appendix 7 contains three tables as follows:

- 1) **Table A7i:** Summary of representations received from specific and general bodies in relation to the suitability of allocating the Pool Court site as a residential traveller site and development guidelines.
- 2) **Table A7ii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the Pool Court site is not a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.
- 3) **Table A7iii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the Pool Court site is a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.

Page 47  
**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
Bellingham Community Project Limited	Does not support this site due to its suitability for 6 pitches and other concerns.	<ul style="list-style-type: none"> <li>• We are a registered charity based at 14a Randlesdown Road and coordinate with the Bellingham Interagency, which works to share information with 60 local agencies which aims to make Bellingham a better place to live.</li> <li>• Bellingham Community Project Limited fully endorses the representation made by Phoenix Community Housing and does not consider that this site is suitable for 6 pitches and has a number of other concerns (please see summary of representation for Phoenix Housing).</li> </ul>	See response to Phoenix Community Housing comments below.



**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
Environment Agency	The suitability of the site might be hard to demonstrate.	<ul style="list-style-type: none"> <li>• It might be difficult for the applicant to demonstrate that 'highly vulnerable' developments, such as caravan sites, would be safe (in flood risk terms), particularly in the case of the Pool Court site which is undefended and where the available modelling doesn't yet include the new climate change allowances.</li> <li>• Site is located within Source Protection Zone 1 for a groundwater abstraction borehole operated for the purpose of public water supply-the operator is Thames Water Utilities Ltd.</li> <li>• Risk if the development introduced new pathways for pollution to travel from ground surface level down to the underlying chalk aquifer from which groundwater is abstracted.</li> <li>• Careful assessment of both the ground conditions and the expected construction works would be needed to ensure that pollution pathways are not created, such as from the introduction of inappropriate infiltration drainage systems or foundation works such as piling.</li> <li>• The site lies within the outline of Flood Zone 3 and Flood Zone 2 at the northern edge of the site. Under the National Planning Policy Framework (NPPF) the site is classified as 'highly vulnerable,' and according to the NPPF development should not be permitted in Flood Zone 3, and should only be permitted in Flood Zone 2 if the exception test is followed.</li> <li>• Need to consider the outputs of the EA's River</li> </ul>	<p>Noted. Since the EA submitted its comments, it has released results of recent modelling of the Ravensbourne River for a 1:100-year flood event including 25 and 35% allowances for climate change. Consultants have mapped the likely extent of flooding on the site and officers and consultants have met with the EA.</p> <p>The modelling shows flood water running back from the River along the adjoining railway corridor and extending on to the western part of the potential site by about 5m. EA officers at the meeting considered that there was the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated. The potential mitigation discussed was as follows:</p> <ul style="list-style-type: none"> <li>• Setting back development 8m from the existing river channel, investigating naturalising the southern bank (i.e. removing the concrete wall) and follow guidance in the Council's River Corridor Supplementary Planning Document.</li> <li>• Avoiding locating caravans, car parking and hard-standing areas which could be used for storage purposes in the high flood risk western part of the site</li> <li>• Incorporating SUDS (e.g. green roofs on permanent buildings) where possible - including devices to control rates of</li> </ul>

**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Ravensbourne modelling 2015 to ensure that the development can be appropriately assessed in terms of flood risk and the appropriate measures taken within the development to ensure the impact of flooding is minimal.</p> <ul style="list-style-type: none"> <li>• Climate Change allowances set out in the guidance: Flood Risk Assessments: Climate Change Allowances need to be take into account in regard to the potential impact on the development and the associated mitigation measures. River Ravensbourne modelling (2015) does not take into account the increase in new climate change allowances and the onus would be on the applicant to provide an adequate flood risk assessment applying these new climate change allowances</li> <li>• Lewisham SFRA: Dry escape above the 100-year flood level taking into account climate change.</li> <li>• In accordance with this plan, development needs to adopt an integrated approach where land and river uses are considered together.</li> <li>• A setback and an 8m buffer zone should be kept to allow suitable access for heavy machinery to allow essential maintenance and if necessary repair to the river wall acting as a flood defense structure.</li> <li>• Recommend flood resilient measures be incorporated within the development to minimise the impact of flooding on the development.</li> </ul>	<p>discharge in to the River to green field run off rates – when not in flood and consider providing attenuation ponds to provide surface water storage and amenity value</p> <ul style="list-style-type: none"> <li>• Incorporating like-for-like level compensation works if ground levels need raising in some areas;</li> <li>• Safe and dry route to safety</li> <li>• Flood Evacuation Plan.</li> </ul> <p>Site-specific guidance contained in the Potential Site Consultation Report already refers to the need to set development back 8m from the River and take account of the River Corridor Improvement Plan. Officers recommend that if this site is chosen the guidance is revised to provide additional guidance on potential mitigation and flood resilient design.</p>

<b>Table A7i: Summary of representations received from specific and general bodies (Pool Court)</b>			
<b>Consultee</b>	<b>Site Suitability</b>	<b>Summary of representation</b>	<b>Officer Response</b>
Historic England	No objection to the site stated, but matters of conservation are identified.	<ul style="list-style-type: none"> <li>• Potential impact of development on the Culverly Green Conservation Area should be considered.</li> <li>• The site adjacent to it is located within an area of known archaeological potential. It is therefore anticipated that archaeological consideration would be required in the event of a planning application.</li> <li>• Council's heritage specialist should be actively engaged in preparation of the IIA and Gypsy &amp; Traveller Local Plan.</li> <li>• Appears the impact on Conservation Areas not been considered and demonstrated in the IIA.</li> </ul>	<p>Officers consider that a traveller site in this location would have no significant impact on the Culverley Green Conservation Area (which lies to the east of the railway embankment). The Integrated Impact Assessment (October 2017) confirms this view.</p> <p>Archaeological issues would be addressed, where necessary, as part of developing a scheme and submitting a planning application (should this potential site be taken forward).</p>
Housing for Women	No objection to the site stated but concerns have been raised related to the impact on resident living in the area.	<ul style="list-style-type: none"> <li>• We are a charitable organisation providing affordable housing in the area for one of the proposed sites. The housing provided is mainly for women.</li> <li>• Our aim re-settle them back into the community by giving them a sense of purpose, belonging and independence. We support them to sustain their tenancy no matter their life experiences.</li> <li>• We have already received concerns from one of our resident's regarding this proposed site. As an organisation we are concerned on what impact this proposed site will have on our residents living in the area.</li> </ul>	Noted. Officers do not consider that a traveller site raises particular issues for this organisation.
Greater London Authority (GLA)	No objection to this site being allocated.	<ul style="list-style-type: none"> <li>• No objection to this site as its development would not compromise the wider designated nature conservation area. If the site is chosen, any development would need</li> </ul>	Noted. See response to comments from the Environment Agency above.

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		to meet Environment Agency requirements and take account of Lewisham Council's River Improvement Plan and other relevant planning policies.	
Lewisham Police Partnership Team	No objection to the site stated but concerns over safety and integration raised.	<ul style="list-style-type: none"> <li>Recognise the potential for discrimination against the Travelling Community and the sensitivities that the local community may have in both areas shortlisted.</li> <li>Recognise concerns the Lewisham Travelling community representative raised about the current Ilderton Road site; they believe that they may be victims of harassment from the 'Southwark' Travelling community should the New Cross site be chosen.</li> <li>Lewisham would at this stage be more supportive of the Pool Court site.</li> </ul>	Noted.
London Borough of Bexley	No objection to the site stated.	<ul style="list-style-type: none"> <li>Support an approach whereby each local planning authority in the southeast London sub-region seeks to meet its own need.</li> <li>LB Bexley does not have any capacity to provide pitches for Lewisham's identified need in the event that neither of the proposed sites can be delivered.</li> </ul>	Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.
London Borough of Bromley	No objection to the site stated.	<ul style="list-style-type: none"> <li>Response to the Lewisham Gypsy and Traveller Accommodation Assessment.</li> <li>Para 3.6 - Traveller Definitions: Information from ORS study suggests that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the majority will need to be addressed through the SHMA.</li> </ul>	<p>Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.</p> <p>Officers consider that the assessment that there is a lack of need for plots for travelling show people is reasonable and will continue to address wider sub-regional traveller and show</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>Paras 4.5 and Paras 5.10 - 5.11 - Interviews with Travellers in Bricks &amp; Mortar: Bromley has engaged with the support worker in relation to the needs of travellers with Lewisham connections (family / Lewisham Traveller Group) currently in bricks and mortar accommodation in neighbouring boroughs, who would be interested in pitches in SE London.</li> <li>The Pitch Needs - “Non-Lewisham” Gypsies and Travellers section deals with travellers with an historical link to Lewisham currently residing in bricks and mortar outside the Borough. It suggests that “The Council should work with neighbouring authorities to consider their accommodation needs”.</li> <li>Bromley considers the needs of those on its waiting list, provides a realistic understanding of families who have an evidenced desire to locate on Bromley pitches although waiting list application alone is not necessarily proof of need or confirmation that the applicants meet the new definition. Lewisham currently has no authorised sites, however, once Lewisham opens a site/s, a waiting list may attract applications from these families in brick and mortar with links to Lewisham.</li> <li>Paras 5.12 – 5.14 Travelling Show Persons Accommodation: The zero requirement for Travelling Show people, (from the main 2015 Lewisham GTAA) is determined on the basis that there are currently no yards in Lewisham and the view of a representative of the Showman’s Guild of Great Britain that they would be</li> </ul>	<p>people needs, including the need for transit sites, through Duty to Co-operate discussions with neighbouring boroughs.</p>

<b>Table A7i: Summary of representations received from specific and general bodies (Pool Court)</b>			
<b>Consultee</b>	<b>Site Suitability</b>	<b>Summary of representation</b>	<b>Officer Response</b>
		<p>looking at existing yards and surrounding land (presumably in Bromley) as “this would be less onerous than seeking new land for yards.” This is a circular argument with the lack of an allocation (making new yards onerous) being used to justify the zero allocation.</p> <ul style="list-style-type: none"> <li>• Transit Provision: The GTAA does not recommend that Lewisham Council consider any transit provision on the basis that there were “only 18 unauthorised encampments from April 2015 - early 2016. This number of incursions is of a similar order to that experienced by Bromley. Bromley’s Proposed Submission Draft Local Plan (2016) draft Policy 12 indicates that, with regard to transit pitches, “the Council will work with the sub region to secure their provision in an appropriate location within the sub region”. Such work will be undertaken mindful of the numbers of incursions experienced by boroughs and the sub regional provision for Travelling Show people that Bromley already provides.</li> </ul>	
London Borough of Enfield	No objection to the site stated.	<ul style="list-style-type: none"> <li>• Given the physical distance between boroughs, the delivery of new pitches in Lewisham would be unlikely to impact on Enfield.</li> </ul>	Noted.
London Gypsy & Traveller Unit (LGTU)	In principle support of the site, however issues related to access, flooding and ownership must be resolved.	<ul style="list-style-type: none"> <li>• Both proposed site allocations suitable for the accommodation of the 6 pitches needed. However, there are constraints for each of the sites that have to be mitigated and it is therefore too early to choose a preferred option.</li> <li>• A number of issues have to be taken into account, particularly in terms of safe access in and out of the site, given its irregular shape, flood risk mitigation, and site</li> </ul>	<p>Access</p> <p>Officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade consider that there would be no need for a secondary vehicular access and that a pedestrian-only exit on to Pool Court was desirable, but not</p>

**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<p>ownership.</p> <ul style="list-style-type: none"> <li>• There should be a secondary access point through Pool Court for emergency vehicles such as fire engines and ambulances.</li> <li>• Need to ensure the part of the site under Network Rail ownership can be acquired or leased at a convenient rate over a long-term period, as the accommodation provided will be permanent.</li> <li>• Should be a clear agreement on any repairs and maintenance required to the railway embankment, who will be responsible for these and how the process will have minimal disruptions on the site residents.</li> <li>• Should consider the possibility of using one site for permanent accommodation and one for negotiated stopping to direct any Gypsies and Travellers who are on unauthorised encampments while passing through the borough.</li> <li>• The IIA should acknowledge the positive impacts the proposed site allocations would have in addressing some of the inequalities facing the Gypsy and Traveller Community, particularly in terms of health</li> </ul>	<p>essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met all relevant guidance and best practice.</p> <p>Flood Risk See response to Environment Agency above.</p> <p>Ownership See response to Network Rail below. On-going maintenance obligations would be considered as part of detailed discussions to acquire the eastern part of the site, should this potential site be taken forward.</p> <p>IIA The updated Integrated Impact Assessment (October 2017) takes account of these and other comments and officers consider that it provides an adequate assessment of the two potential sites.</p>

<b>Table A7i: Summary of representations received from specific and general bodies (Pool Court)</b>			
<b>Consultee</b>	<b>Site Suitability</b>	<b>Summary of representation</b>	<b>Officer Response</b>
Multimac Surfaces Ltd.	No objection to the site stated, however the suitability of the site for residential purposes was questioned.	<ul style="list-style-type: none"> <li>We are opposite the proposed site at 29 Fordmill Road. We recently enquired into the freehold purchase of the adjoining property which was owned by the national rivers authority, but were deterred from purchasing as they had entered a form of covenant to the title which stated that the area was a flood zone and could never be used for residential purposes.</li> </ul>	Noted. See response to the Environment Agency.
National Grid	No objection to the site stated.	<ul style="list-style-type: none"> <li>National Grid has no comments to make in response to this consultation.</li> </ul>	Noted.
Natural England	Do not support the use of this site and support the provision of an alternative sites.	<ul style="list-style-type: none"> <li>Removal or disconnection of green space corridors is considered an impact to the environment that should be avoided by finding an alternative site.</li> <li>The site is located adjacent to the Pool River and Ravensbourne River junction. This area is identified in Lewisham’s River Corridor Improvement Plan.</li> <li>The site is part of the ‘River Pool Linear Park site of importance for nature conservation’ and is protected by SINC2 in Lewisham Site Allocation Plan.</li> <li>Any works within ten meters of Pool or Ravensbourne Rivers will need an environmental permit.</li> <li>Pool Court site, including any unused portions of the scaffolding site and railway siding should be rehabilitated and included in the Pool River Linear Park as per the Lewisham’s River Corridor Improvement Plan.</li> </ul>	<p>Currently the whole site is within the Pool Court Linear Park Site of Importance for Nature Conservation (SINC) (Borough Importance), although the Re-Survey of SINC’s 2016 proposes to exclude the scaffolding yard from the designation. Planning Policy CS 12 &amp; Site Allocations Local Plan seek to protect SINC’s.</p> <p>Officers anticipate that the ecological value of the potential site would be relatively limited due to the dominance of Japanese knotweed across the Council owned land. Overall, officers consider that a carefully designed scheme that eradicates knotweed, responds positively to the river, retains/mitigates the loss of existing valuable trees and any protected species issues would be acceptable.</p> <p>Site-specific development guidance contained in the Potential Site Consultation Report already calls for careful treatment next to the River,</p>

Page 180



Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>If development were to be planned for this site, significant contributions to neighbouring green space and on-site Green Infrastructure would need to be included.</li> </ul>	retention of trees where possible and careful lighting. This could be strengthened if this potential site went forward.
Network Rail	The site is unsuitable for allocation	<p>Site contains a large area of land owned by Network Rail. The section of land known as 'Land off Fordmill Road, Bellingham' which is located within the Pool Court site forms part of the DfT remit.</p> <p>Parts of the site are also located adjacent to Network Rail's ownership boundary and operational infrastructure.</p> <p>Network Rail has freeholder ownership of the site which is currently leased to R.H. Scaffolding. The lease is protected by the Landlord and Tenant Acts, compensation would be due to the tenant if the lease was terminated and the lease can only be terminated under certain conditions, the landlord wishing to redevelop the site being one of these.</p> <p>Network Rail object to the proposed Gypsy and Traveller designation at Land at Pool Court, Catford.</p> <p>The use of the Land off Fordmill Road site as a Gypsy and Traveller site would not maximise the development potential of the site in relation to delivering residential units to meet DfT and Lewisham Council housing targets and in generating funds to reinvest into the railway.</p> <p>We feel the site is unsuitable for the above allocation due to:</p> <ul style="list-style-type: none"> <li>Network Rail is not willing to sell the property to the</li> </ul>	The Council owns the western part of the potential site, but not a sliver of land between the site and the Ravensbourne River. Network Rail owns this sliver of land and also the eastern part of the potential site, which is partly occupied by a scaffolding yard which has a lease expiring in 2020. Officers have held discussions with Network Rail over the possibility of purchasing its interest in this land. Network Rail is currently undertaking a portfolio sale of its commercial estate. However, in August 2017, in response to a letter from the Mayor, Network Rail confirmed that owing to the requirement to produce a definitive portfolio of assets for the marketing and potential disposal of its commercial estate, it is no longer able to consider offers for the sale of the eastern part of the potential site. On this basis, the Council would need to discuss purchase with the new owner of the land. Officers understand that Network Rail is hoping to dispose of its commercial estate in June 2018.

**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Council for the above purpose and LB Lewisham would need to use CPO powers to acquire the property. Network Rail will pursue maximum value in any disposal process.</p> <ul style="list-style-type: none"> <li>• The property is currently included in a wider disposal package which is currently undergoing a lengthy and complex disposal process. LB Lewisham will potentially need to deal with a new land owner.</li> <li>• The property is currently leased to a tenant and compensation would be due to the tenant if the lease was terminated.</li> <li>• The question of using part of the property as a Gypsy / Traveller site was raised; Network Rail is unenthusiastic due to the adverse impact this would have on the value of the remainder of the property.</li> <li>• The second potential site, 'New Cross Social Club and adjoining land', is owned by the LB Lewisham which we believe makes it a more appropriate site.</li> </ul> <p>2) Network Rail would be keen to work with LB Lewisham in order to bring forward the Network Rail owned land at Pool Court and adjacent LB Lewisham owned vacant land for residential development. As you are aware, this site extends to approx. 0.3ha and could accommodate a significant number of residential units, with potential for affordable housing provision as part of any development.</p> <p>3) Unfortunately, due to the stage Network Rail is at with the aforementioned disposal process, we need to make a decision on whether to pull the property out of the disposal package in the very near future. The only justification to remove the property from the disposal package would be its</p>	

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		potential as a development site - in terms of assisting Network Rail in meeting our housing provision targets and the higher value of the property as development land.	
New Cross Gate Trust	Object to the site suitability on conservation grounds.	<ul style="list-style-type: none"> <li>Unfamiliar with site. But it has a conservation order on it and therefore should not be considered suitable either</li> </ul>	There is no 'conservation order' in place. See response to Natural England above.
NHS Lewisham Clinical Commissioning Group	No objection stated.	<ul style="list-style-type: none"> <li>Lewisham CCG feel that the impact on health services in the area would be minimal.</li> </ul>	Noted.
Outreach Service for Gypsy and Roma Travellers, Lewisham Irish Community Centre	No objection to the site stated, however issues including ownership, flood risk and access were identified.	<ul style="list-style-type: none"> <li>Both proposed site locations appear to be of a suitable size to accommodate the 6 pitches needed. There are advantages and disadvantages to each of the proposed site locations.</li> <li>Very few of the travellers currently living in Lewisham are living in and around New Cross, which is a very built up, and is close to an area of regeneration area in the adjoining borough. This regeneration programme is liable to increase population density, making the area less suitable for a traveller site. There are also two existing Traveller sites run by Southwark Council very close to Lewisham's proposed New Cross site.</li> <li>Most traveling families connected to Lewisham are living in and around the south of the borough, close to the Bromley border, and tend to return to this part of the borough between periods of travelling.</li> </ul>	<p>Noted.</p> <p>Access See response to London &amp; Gypsy Traveller Unit above.</p> <p>Flood Risk See response to the Environment Agency above.</p> <p>Ownership See response to London Gypsy &amp; Traveller Unit above.</p> <p>Negotiated Stopping Place The Gypsy and Traveller Accommodation Assessment Update (August 2016) notes that there is the possibility that changes to the definition of 'gypsy and traveller' that took place</p>

**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>• The south of the borough has lower rise buildings and accommodation which create a more suitable environment for the community.</li> <li>• In the south of the Borough there are facilities, shops and services where the community is known and accepted and schools which have accrued experience in working with young people from the Traveller communities. Family ties and networks are stronger in the south of the borough than they are in New Cross.</li> <li>• To accommodate only 6 tenants/licenseses from the community at New Cross while the rest of the community remains south of the borough is likely to fragment the community cause isolation for families as extended families would be split.</li> <li>• Access in and out of the site is a concern, given its irregular shape. Some homes might need to be located along the long 'arm' of the site, which could be dangerous for pedestrians &amp; children.</li> <li>• A secondary access point through Pool Court would resolve this problem, obviate the need for a turning circle in the triangular part of the site and allow excellent access for emergency vehicles such as fire engines and ambulances.</li> <li>• There is a possible flood risk, including that from potential 'run-off' from the railway embankment.</li> <li>• Importantly, the council needs to ensure that the part of</li> </ul>	<p>in 2015 could result in increased levels of travelling but it is not recommended that there is a need for the Council to consider any transit provision at this time.</p> <p>The Council and the Metropolitan Police have developed a joint policy and protocol for unauthorised encampments and officers do not consider that there is the need for a transit site or a negotiated stopping place.</p> <p>IIA See response to Gypsy &amp; Traveller Unit above.</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>the site currently under Network Rail ownership can be acquired or leased at an affordable rate over in the long term, as the site accommodation provided will be permanent.</p> <ul style="list-style-type: none"> <li>• There should be a clear agreement on any repairs and maintenance required to the railway embankment (which would remain in Network Rail ownership), including who will be responsible for these and how any repairs would cause minimal disruption to site and existing residents.</li> <li>• As there has been an increase in the number of unauthorised encampments in the borough in the last two years, it would be wise for the council to consider the possibility of using one of the identified locations for permanent accommodation and the other one as a negotiated stopping place. This would allow the CRT or police to direct any Gypsies and Travellers who stop on unauthorised encampments in the borough to a legal and safe temporary stopping place.</li> <li>• Should acknowledge the positive impacts the two proposed site allocations would have in addressing some of the inequalities facing the Gypsy and Traveller community, particularly in terms of health.</li> </ul>	
Phoenix Community Housing Association	Phoenix does not consider that this site is suitable for 6 pitches and has a number of other concerns.	<ul style="list-style-type: none"> <li>• Phoenix does not consider that this site is suitable for 6 pitches and has a number of other concerns.</li> <li>• The ownership of the land could hamper development of the site. The land at Pool Court is partly owned by the Council and partly owned by Network Rail. There is also a</li> </ul>	<p>Ownership See response to Network Rail above.</p> <p>Safety, public space &amp; play space: Officers consider that a safe and attractive traveller site could be provided here – including</p>

**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<p>scaffolding yard operating a business on the land owned by Network Rail and an area designated as a Site of Importance for Nature Conservation.</p> <ul style="list-style-type: none"> <li>• We are concerned that building a community, which is likely to include children, and placing it on a narrow strip of land in a potentially unsafe, flood area between a river and a railway line presents risks that are not easily mitigated.</li> <li>• The location of the site and physical constraints mean there is limited access to public space.</li> <li>• The size combined with the shape of the site could limit turning and mobility within in the site both for the actual pitches as well as other vehicles.</li> <li>• The shape of the site and single point of access at Fordmill Road further limits safe vehicular access for the community, visitors and emergency vehicles, which could be disruptive to both the new community and residents in the local area.</li> <li>• The size of the pitch could also limit the provision of amenity space on the site such as landscaping, play area and or communal space.</li> <li>• In addition, the shape and location of the site, (a narrow strip adjacent to a river and railway line), seems to provide little opportunity for physical integration with the local community.</li> </ul>	<p>areas of open space and shared space suitable for play. See response to Environment Agency above in relation to flooding.</p> <p>Access The Highway and Access Feasibility Report (October 2016) tested vehicular access and 'swept path analysis' (vehicle turning space requirements) for an 18.5m lorry (which is bigger than a fire engine) for three scenarios: (1) In and out via scaffolding yard, (2) In and out via Pool Court and (3) In from Scaffolding yard and out from Pool Court.</p> <p>All scenarios allow for a lorry to enter and leave in forward gear but take up different amounts of the site. The Potential Sites Consultation Report incorporates Scenario 1, on the basis that an in and out single access from Fordmill Road is preferable to traveller site traffic using Pool Court to exit a site. Officers consider that likely levels of traffic mean that family-sized pitches would be acceptable. Such an approach should not be unduly disruptive for people living on a site and should cause inconvenience for users of Fordmill Road or existing local residents.</p> <p>Nature Conservation See response to Natural England above.</p> <p>Environment Agency Appraisal See response to Environment Agency above.</p>

**Table A7i: Summary of representations received from specific and general bodies (Pool Court)**

Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>• Presence of other communities in the vicinity at Beatrice House (that consists of 73 flats in blocks offering sheltered housing for elderly residents) and McMillan House which offers safe accommodation for women.</li> <li>• We are concerned that if this site is selected there will be an even higher density of people with specific needs and different needs located in one area.</li> <li>• The proposed site is a Site of Importance for Nature Conservation. We are concerned that any re-designation of the site could have a negative impact on the biodiversity value of neighbouring sites which support protected or priority habitats of species.</li> <li>• Recommend that the Environmental Agency sustainability appraisal (with respect to flood risk) is completed before a decision is made on the site.</li> <li>• Would like to know the response rate from the local community and local service providers. Our experience is many hard to reach groups respond best to door knocking and one to one contact rather than public meetings.</li> <li>• Unclear from the supporting documents what provision would be for utilities and waste management at the proposed site.</li> </ul>	<p>Any planning application for a traveller site here would need to be supported by a detailed Flood Risk Assessment.</p> <p>Response Rate See summary in the body of this Statement.</p> <p>Utilities &amp; Waste Management Issue would be addressed as part of any detailed design.</p>
RHS Site Services Ltd.	Does not support the site due to loss of an operational business.	<ul style="list-style-type: none"> <li>• Small local firm been in the yard at Fordmill Road London SE6 3JL since 2007.</li> <li>• Have serviced all the local builders and residents with all</li> </ul>	Core Strategy Policy 5 and DM Policy 11 seek to protect the scattering of employment locations throughout the borough outside of designated employment locations. However,

<b>Table A7i: Summary of representations received from specific and general bodies (Pool Court)</b>			
<b>Consultee</b>	<b>Site Suitability</b>	<b>Summary of representation</b>	<b>Officer Response</b>
		<p>their scaffolding and small building needs and have trained many young people that live in Lewisham. If this was taken away from Lewisham this would be a big loss especially to the Bellingham estate.</p> <ul style="list-style-type: none"> <li>• I would like to have the opportunity to meet with you at The Yard at Fordmill Road SE6 3JL to explain why the yard needs to stay as it is.</li> </ul>	<p>officers consider that facilitating the provision of a traveller site could represent special circumstances that justify this loss. If this site went forward, officers would consider what re-location assistance the Council would be able to offer.</p>
Southern Gas Network	No objection stated.	<ul style="list-style-type: none"> <li>• Presence of various large diameter gas mains within the access area to both of the planned sites. The large diameter gas mains are located in the public highway.</li> <li>• These mains are 630mm / 48" in diameter and access to our plant would be needed 24/7m. Any impingement to our plant could cause us severe operational issues to our gas distribution network.</li> <li>• From safety point of view any bonfires, near our plant would be of concern.</li> </ul>	<p>Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.</p>
The Wheelshunters Club	No objection to this site stated.	<ul style="list-style-type: none"> <li>• Feel that this site would be better and its selection would enable the Wheelshunters Club to continue to serve the community.</li> </ul>	<p>Noted.</p>
Thames Water	No objection stated.	<ul style="list-style-type: none"> <li>• For Thames Water to comment on the sewerage requirements of the sites being considered and the impact on existing systems an indication of the location and number of pitches proposed, would be necessary. However, in very general terms for the small number of new units proposed Thames Water don't expect any major concerns.</li> </ul>	<p>Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.</p>



<b>Table A7i: Summary of representations received from specific and general bodies (Pool Court)</b>			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> <li>In the absence of sewers within the vicinity, the developer of the accommodation will be required to make provision for wastewater services either, after consultation with Thames Water, lay a sewer (at his/her own expense) from the site to an appropriate and agreed connection point on the public sewerage network and offer this for adoption or make some form of onsite provision to the disposal of wastewater, septic tank for example.</li> </ul>	
Transport for London (TFL)	No objection stated.	<ul style="list-style-type: none"> <li>This site does not raise any strategic transport issues</li> </ul>	Noted.

Page 189

<b>Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters</b>		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Site size/capacity	<ul style="list-style-type: none"> <li>The site is not suitable for the development of 6 pitches.</li> <li>The average pitch size suggested (400m) is the smallest end of the recommended density rating according to the London Gypsy and Traveller Unit.</li> <li>The site is too small to accommodate roads, turning etc.</li> <li>Does the site allow for hard standing for a static caravan, touring caravan and a parking space, plus single storey amenity, some landscaping / open space and a play area?</li> <li>The site should be used to house homeless people and at a higher density to accommodate more people.</li> <li>The Council is proposing six pitches, but traveler communities are known to illegally enlarge.</li> </ul>	<p>The Masterplan Capacity Study demonstrates that the site could satisfactorily accommodate at least 6 pitches in accordance with the draft development guidelines in the Potential Sites Report (including a single in-out vehicular access from Fordmill Road and pitches set back 8m from the River) and also taking account of subsequent advice from the Environment Agency to pull pitches away from the western boundary.</p> <p>Officers have begun investigating the possibility of further rationalising the potential site so include part of the existing hammer head vehicular-turning area at the northern end of Pool Court.</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Location	<ul style="list-style-type: none"> <li>The potential site is unsuitable because it is currently a Conservation Area (Culverley Green)</li> <li>A traveler site in this location is not the way forward for the regeneration of Catford which the Council have been discussing for a long time.</li> <li>Overcrowding is already an issue in Catford.</li> </ul>	Officers do not consider that a traveller site would have any significant adverse effects on the Culverley Green Conservation Area (which lies to the east of the railway embankment).
Suitability for residential use	<ul style="list-style-type: none"> <li>Land is more suited to a scaffolding yard than housing.</li> <li>The environment is not safe for residential use due to proximity to river, the railway line and flood based risks.</li> <li>It would be better used as allotments or a community garden</li> <li>The loss of designated open space would be negative for the local community</li> <li>The site is designated Site of Importance for Nature Conservation (SINC).</li> <li>Pool River Walk is valued by local residents and shouldn't be built on.</li> </ul>	<p>The potential site has been identified as 'Good' for four of the relevant Site Selection Criteria, 'Average' for four and 'Excellent' for one and officers consider that it is suitable. The draft Masterplan Capacity study demonstrates that the potential site could accommodate at least six traveler pitches.</p> <p>Whilst existing and potential alternative use is relevant, there is pressing need to provide a traveller site.</p>
Highways, access and accessibility	<ul style="list-style-type: none"> <li>The site does not appear to meet approved criteria for safe vehicular access or be capable of safe vehicular access for 15m long caravans and turning</li> <li>The site does not appear to be capable of safe access for emergency vehicles</li> <li>The site has poor public transport connections</li> <li>The site will worsen levels of existing traffic congestion on the south circular and Fordmill Road where traffic associated with nearby school converges / The Canadian Avenue/Bromley Road/Fordmill Road area already suffers from excess traffic and regular queues - additional traffic to and from this site would only exacerbate that. The main entrance will be in Fordmill road which is a very busy road with big lorries going to the warehouse with goods all day</li> <li>15 m x 3m caravans would have an impact on highway safety for</li> </ul>	<p>The Highway and Access Feasibility Report (October 2016) tested vehicular access and 'swept path analysis' (vehicle turning space requirements) for an 18.5m lorry (which is bigger than a fire engine) for three scenarios: (1) In and out via scaffolding yard, (2) In and out via Pool Court and (3) In from Scaffolding yard and out from Pool Court.</p> <p>All scenarios allow for a lorry to enter and leave in forward gear but take up different amounts of the site. The Potential Sites Consultation Report incorporates Scenario 1, on the basis that an in and out single access from Fordmill Road is preferable to traveller site traffic using Pool Court to exit a site. Officers consider that likely levels of traffic mean that family-sized pitches would be acceptable. Such an approach should not be unduly</p>

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Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>children walking to school and cause delays for bus routes on Fordmill Road and buildup of other traffic</p> <ul style="list-style-type: none"> <li>• The position of the exit to the site on Fordmill Road would necessitate further parking restrictions to improve sightlines from the site entrance. This would worsen existing on street parking issues for local residents</li> <li>• Large vehicles including emergency vehicles can't travel along the road because of people parking on the unrestricted side of the road. Concern there would be overspill from the proposed site that would increase the problem.</li> <li>• There is only one access/exit route whilst the New Cross site has two.</li> <li>• The positioning of the exit to the camp would require further restriction to parking in this area and make parking for residents even more difficult.</li> </ul>	<p>disruptive for people living on a site and should cause inconvenience for users of Fordmill Road or existing local residents.</p>
Ownership & Delivery	<ul style="list-style-type: none"> <li>• Delivery of the site is constrained by landownership as the site is part owned by network rail and part owned by the Council.</li> <li>• Land is not available right now due to landownership constraints and the Council stipulated that the proposed land by Council owned.</li> <li>• Network Rail land should only be purchased if it will benefit the whole community.</li> <li>• It is uncertain Council will be able to purchase Network Rail Land</li> <li>• The negative impact of costs associated with purchasing land from Network Rail, undertaking further Environmental Impact Assessment work loss and /or relocation of existing operational business</li> <li>• The cost of delivering a site for a small number in light of wider cuts</li> </ul>	<p>See response to Network Rail in Table A7ii.</p> <p>Concerns about affordability noted.</p>
Loss of operational business	<ul style="list-style-type: none"> <li>• The re-development of the site for gypsy and traveller accommodation would result in the loss of an operational business, the scaffolding yard and the Council supports successful businesses.</li> <li>• There would be fewer local employment opportunities</li> <li>• Potential disruption to nearby businesses</li> </ul>	<p>See responses to RHS Site Services Ltd in Table A7ii. Officers do not consider that a residential traveler site would disrupt nearby businesses.</p>

Page 191

**Table A7ii Summary of matters raised by individuals as to why the Pool Court site is not a suitable site and other matters**

Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Biodiversity	<ul style="list-style-type: none"> <li>• The site is a Site of Importance for Nature Conservation (SINC). Environment Agency good practice states the gypsy and traveller sites should not have a negative impact on biodiversity value.</li> <li>• Would result in a negative effect on landscape as mature trees and undergrowth provide a tranquil vista to residents</li> <li>• Proposals will result in loss of habitat as the site is part of a wildlife corridor and surrounding wildlife must be protected.</li> <li>• The proposal is inconsistent with the aims of the Lewisham’s River Corridor Improvement Plan that the biodiversity and landscape of the Linear Park should be protected and enhanced.</li> <li>• There will be a risk of predation to existing wildlife from dogs kept on site</li> <li>• The site would increase the risk of chemical and light pollution impacting on nearby animals and plants.</li> <li>• Loss of SINC and wilderness space, precious in inner city borough and help to reduce pollution, heavy in Catford because of south circular and frequent slow-moving traffic entering area nearby, on approach to Catford Centre.</li> <li>• Needs more robust measures to ensure the development and subsequent occupation of the site maintains the environmental importance of the area</li> <li>• As the site is not accessible to the public it has remained a sanctuary to wildlife and provides a habitat to newts, toads, squirrels and foxes. There are a number of larger bird species including woodpeckers, warblers, greenfinches, chaffinches, magpies and parrots that nest in the trees</li> </ul>	See responses to the Environment Agency and Natural England in Table A7ii.

Page 192

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Flood Risk, Water Management & River Pool Management	<ul style="list-style-type: none"> <li>• There is a flood risk associated with this site</li> <li>• The site is liable to flooding</li> <li>• Think the council is underestimating the flood risk-maybe not that the site will fill out flood, but that it is waterlogged in winter</li> <li>• Updated flood modelling for the area needs to take place. It should offer allowances for any potential impacts of climate change which indicate future flood impact.</li> <li>• The existing undeveloped site provides a pervious surface for water to drain away. Increasing paved surfaces will increase surface water run-off.</li> <li>• Unsuitable due to the fact that the area is currently designated as part of the river pool linear park and is protected.</li> <li>• The allocation would create a risk of pollution and waste overspill into the river and surrounding areas / Risk of contamination (river) from dumping rubbish and human waste.</li> <li>• At present the undeveloped land acts as a soak away from rainwater. Further hardscaping of land will move the risk of localised flooding to neighbouring properties. Work to reduce the risk of flooding to the site would only push flood water to other areas nearby, whilst potentially damaging the River Pool Park</li> <li>• The river pathway between Catford and Bell Green is already lonely and I would not walk along there if I knew I was near a travellers' camp</li> </ul>	See response to the Environment Agency in Table 13.
Physical and social integration	<ul style="list-style-type: none"> <li>• Due to the site being bounded by the river and railway line as well as the shape, the site does not allow for physical integration with the local community.</li> <li>• The site has limited access to local amenities including a doctor's surgery and shops</li> <li>• The adjacent residential uses at Beatrice House and McMillian House offer residential accommodation for elderly residents and safe housing for women. Introducing another vulnerable group, gypsies and</li> </ul>	<p>The site would be self-contained, but not hidden from the surrounding settled community.</p> <p>If this site were chosen, the Council and its partners would need to strengthen their efforts to increase the capacity and resilience of local communities. In addition, officers recommend that the Outreach Worker facilitates meetings between local residents and members of the Lewisham traveller community to build</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>travellers, raises concerns.</p> <ul style="list-style-type: none"> <li>• Have the Council assessed any potential impact on Pool Court residents as a vulnerable group?</li> <li>• The allocation is going to detract people from moving into the area, including families.</li> <li>• If crime and antisocial behaviour increases in the area, that would be bad for the whole local community</li> <li>• I would like to know how the travelling community plan to integrate into the community in terms of contributing to community welfare and resources.</li> </ul>	<p>understanding and community cohesion during the detailed design, planning stages and beyond.</p>
Impact on area of deprivation	<ul style="list-style-type: none"> <li>• Best practice suggests traveller sites should not be built in socially deprived areas to allow for better integration. Bellingham ward has some of the highest levels of social deprivation in the borough.</li> <li>• The proposal will not improve the area and will bring more poverty to Bellingham</li> <li>• Buying land from Network Rail for a small handful of people would be a complete waste of money for Lewisham residents, and would raise serious questions about the council's ability to provide services for all, with monies raised from residents.</li> <li>• Too close to vulnerable old people</li> <li>• Why bring more poverty into our area? Maybe a more affluent area would cope better.</li> </ul>	<p>The English Indices of Deprivation 2015 measures multiple deprivation at the small area level across the country based on a number of issues including income, education, health, barriers to housing and services. Bellingham (which includes the potential Pool Court site) is the third most deprived Ward in Lewisham and is within the 20% most deprived neighbourhoods (Lower Layer Super Output Areas) in the country.</p> <p>See response above in relation to integration.</p>
Service and infrastructure constraints	<ul style="list-style-type: none"> <li>• Health, education, access to employment and other services in this location are already operating under under pressure. Will there be consultation with healthcare providers and schools in this area as part of the process?</li> <li>• Natural Environment Research Council (NERC) specifies that Gypsy and Traveller Site should be located in locations with good access to open space. This location does not comply.</li> <li>• The site is isolated and residents would have to go to Bellingham for the supermarket or more likely all the way to Catford.</li> </ul>	<p>The traveller community does have particular needs around education and health and faces particular challenges in accessing health, education and other services. Officers have engaged with the Council's School Places Manager and NHS Lewisham Clinical Commissioning Group (CCG) at all stages of the process. The CCG has responded to the latest consultation stating that it considers that the impact on health services would be minimal for either site.</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
		Officers do not envisage that the population generated by the provision of a site (circa 20-25 people) would add undue pressure on local infrastructure or services. However, it is recommended that liaison takes place with local schools and GP surgeries once a preferred site is known to enable them to make any adjustments to service provision that may be necessary in advance of a site being first occupied.
Safety	<ul style="list-style-type: none"> <li>• Fear of intimidation and discomfort walking past this site and living in close proximity to the site</li> <li>• It is a safe place for the elderly and if there was a Gypsy and Travellers site very near, old and vulnerable residents would be very frightened</li> <li>• Fear of theft and risk of antisocial behaviour</li> <li>• Danger to life and fear for safety of children linked to the proximity to the adjoining railway land and river</li> <li>• Provision of a single emergency access point is required.</li> <li>• Feeling on existing safety is low and people are already afraid to walk around. Existing issues could be made worse.</li> <li>• There are negative perceptions of the gypsy and traveller community</li> </ul>	<p>Access to adjoining railways would be secured and officers consider that detailed design should ensure a safe environment for children living on a site.</p> <p>The Potential Sites Consultation Report identifies the need for a Site Management Plan and this could satisfactorily manage the way the site is used.</p> <p>See response above in relation to Access &amp; Accessibility.</p> <p>Officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade considered that that there would be no need for a secondary vehicular access a pedestrian-only exit on to Pool Court was desirable, but not essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met the all relevant guidance and best practice.</p>
Amenity & Environmental Quality	<ul style="list-style-type: none"> <li>• New users of the site would create noise and disturbance</li> <li>• The noise absorption from the railway afforded by trees and bushes will be lost and will impact on residents both in Pool Court and Fordmill Road</li> <li>• Noise from the trains isn't going to be pleasant for the residents especially as Southern have said they are finally going to increase the</li> </ul>	<p>Officers consider that the site could provide a high-quality environment for the traveler community.</p> <p>The Council's Environmental Protection Team has highlighted the need to consider noise from neighbouring railway lines, but raised no objection in principle to residential use of the site. Caravans</p>

**Table A7ii Summary of matters raised by individuals as to why the Pool Court site is not a suitable site and other matters**

Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>trains on the Catford loop.</p> <ul style="list-style-type: none"> <li>• Poor sunlight, daylight and artificial lighting</li> <li>• Potential subsidence</li> <li>• Concerned about the dumping of rubbish by the gypsy group</li> <li>• Fly tipping is an existing problem and this problem may increase if people could feel they could blame the gypsy and traveller community. Will there be strict rules to guide waste disposal? Strangers come and dump their rubbish and the Housing Association cleared them. As a result, residents are affected by the rent increase</li> <li>• By bringing the traveller community to this area I believe it will make the area more unsightly.</li> <li>• There is already considerable light pollution. On-site external lighting should not cause disturbance to nearby residents or harm the biodiversity value of the site or adjoining land</li> <li>• An area dedicated to parking large caravans, smaller caravans and cars with the purpose of people residing in the area will have an ugly appearance as a visual amenity to the local area</li> </ul>	<p>are generally not well insulated against noise and the layout, orientation and design of pitches and associated structures would need to take account of this. If this site was chosen, it is recommended that the site-specific guidance is amended to reflect this and to refer to the need for a solid fence of appropriate mass/sound reduction qualities to be installed along the western boundary.</p>
Other	<ul style="list-style-type: none"> <li>• We have so many more important problems that are being ignored.</li> <li>• The Council should not be diverting resources to this when there are so many cuts going on</li> <li>• More information on the plan for residents would be beneficial for example, how do you plan to advertise to travellers? Will the site be open to the residence in the local area which are currently facing a housing shortage? Will there be permanent buildings on the site? There is a good example of how one should work at South Bermondsey Station.</li> <li>• More could have been done to inform residents about this process by writing to the houses in Fordmill Road next to, opposite the site and within Pool Court. I would also like assurance that the Council will keep residents well informed about the outcome of the review of the two proposed sites and about the next steps in what is a complex and lengthy process.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted.</li> <li>• Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified.</li> <li>• The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site, establishing a flood evacuation plan and managing potential anti-social behaviour (such as burning off material).</li> <li>• Consultation can always be better. However, officers consider</li> </ul>

Page 196



Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<ul style="list-style-type: none"> <li>The draft plans appear to be fine on paper, but in reality, how will monitor this to ensure travellers adhere to these?</li> <li>Many companies such as 'Park Home Living' provide the lifestyle to live in a permanent mobile home for those that choose to do so.</li> <li>Adjacent sites will lose value.</li> </ul>	<p>that high quality consultation took place in accordance with the relevant regulations and Council's Statement of Community Involvement.</p> <ul style="list-style-type: none"> <li>Property values are not a material planning consideration.</li> </ul>

Table A7iii Summary of matters raised by individuals as to why the Pool Court site <u>is</u> not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Size & Capacity	<ul style="list-style-type: none"> <li>There is more room around this site / it is a good size</li> <li>The site is larger and the pitches will be larger</li> <li>It can accommodate more travelers / pitches</li> <li>The site could potentially fit more pitches on the site</li> <li>Traveller families also have larger families than average so need large sites wherever possible (Pool Ct: 500sqm vs New Cross 400sqm)</li> </ul>	Noted.
Location	<ul style="list-style-type: none"> <li>Traveller families who should not be forced to live in a very limited geographical area. It makes it more difficult to house families separately for example if there was a domestic violence or intimidation issue. This is in contrast to other social housing tenants who could request to be moved to a different area.</li> <li>Future development of the Catford site will be restricted by its nature reserve type setting, and its use therefore for single storey light-touch traveller accommodation is appropriate</li> <li>If pitches are not provided, Gypsies will end up unlawfully occupying land around the borough which has not been identified or authorised for residential use from the Council.</li> <li>The location of the traveller site at Pool Court will have far less of an impact on the lives of residents within the borough</li> </ul>	Noted.

Page 197

Highways, Access and Accessibility	<ul style="list-style-type: none"> <li>No new road entry points will be needed to be constructed, so there should be minimal impact on existing residents on Fordmill road.</li> </ul>	Noted.
Ownership & Delivery	No relevant comments.	n/a
Suitability for residential use	<ul style="list-style-type: none"> <li>Not much of the land is in use</li> <li>The scaffolding yard could easily relocate and this will be cheaper than replacing community facilities.</li> <li>The site has less housing potential than the New Cross site.</li> </ul>	Noted. See response to RHS Site Services in Table A7ii.
Loss of operational business	<ul style="list-style-type: none"> <li>A new location for the scaffolding business is important as it brings jobs to the area.</li> <li>Supporting a business to relocate is also a significantly simpler and cheaper undertaking for a council than providing replacement community facilities.</li> </ul>	See response to RHS Site Services Ltd. In Table A7ii.
Biodiversity	<ul style="list-style-type: none"> <li>The biodiversity can be managed well</li> </ul>	Noted – see response to Natural England in Table A7ii.
Flood Risk & Water Management	<ul style="list-style-type: none"> <li>The flood risk can be managed well</li> <li>Enhancement of the river area will be critical to the success of the scheme as well as the management and maintenance of this area while the site is in occupation.</li> </ul>	Noted – see response to the Environment Agency in Table A7ii.
Physical and social integration	<ul style="list-style-type: none"> <li>The development of the site would affect fewer people</li> <li>This land is not used by the community and this solution that would not harm the community in the way that the Social Club solution would.</li> <li>The site is closer to family [of known gypsies and travellers] who live Downham and Catford.</li> <li>We need to stay close together to support each other.</li> <li>Familiar with the surrounding area including shops and doctors.</li> <li>The site would provide a more welcoming environment for potential travelers, in a more welcoming area.</li> </ul>	Noted.
Impact on area of Deprivation	<ul style="list-style-type: none"> <li>More sunlight / daylight</li> <li>Greater privacy. It is not located close to other flats.</li> <li>More space</li> </ul>	Noted.

<p>Service &amp; Infrastructure Constraints</p>	<ul style="list-style-type: none"> <li>• In close proximity to local amenities including green space.</li> <li>• Links to the community and facilities, especially next to green space of Bellingham Park Play for the children.</li> <li>• More open space nearby for recreation including for any travellers with horses.</li> <li>• Suitable as not infringing on existing community services and provision.</li> </ul>	<p>Noted.</p>
<p>Safety</p>	<ul style="list-style-type: none"> <li>• The site is a safer environment</li> <li>• It is important that all local authorities provide a safe suitable space for families to live with dignity</li> </ul>	<p>Noted.</p>
<p>Amenity &amp; Environmental Quality</p>	<ul style="list-style-type: none"> <li>• Pool Court has a lower population density in the surrounding areas which means adjacent buildings are 2 storey (vs 4 storey at Hornshay) so the sites won't be overlooked.</li> <li>• What measures are going to be put in place to ensure contamination of this land and environmental resource does not take place?</li> <li>• Sounds well planned and I think it would improve the area.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Contamination issues would be addressed at detailed design stage if this site went forward.</li> <li>• Noted.</li> </ul>
<p>Other</p>	<ul style="list-style-type: none"> <li>• It is important for the council to make provision for our travelling community</li> <li>• It would be good to have more information on the plan for residents. For example: Will the site be open to the residence in the local area which are currently facing a housing shortage</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified.</li> <li>• The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site, establishing a flood evacuation plan and managing potential anti-social behaviour (such as burning off material).</li> </ul>

# Appendix 8: Shontelle Williams Report

Page 200

## Appendix 9: Petitions

### (1) Lovelinch Close (opposing New Cross site)

Petition signed by 315 people was submitted at the Council meeting on 23 November 2016.

The petition states:

“The planned site will adversely affect our local infrastructure and our community will struggle even further to supply the needs of residents, particularly our younger residents, with safe areas to play, socialise and channel their energies positively. The proposed plan is to demolish the multi-use games area and social hall/bar – both of which play an integral part for our residents and will greatly affect the future wellbeing of our community. In a climate where murder, crime and a lack of opportunities are already soaring at an alarming rate within our community, we believe that the proposal of a Traveller Site is disproportionately weighted against Lovelinch Close and our neighbours.”

Summary of main issues raised:

- Adverse effect on local infrastructure and the community will struggle even further to supply the needs of residents, particular younger residents with safe areas to play, socialise and channel their energies positively.
- The multi-use games area and social hall/bar – both play an integral part for residents and their demolition will greatly affect the future wellbeing of the community.
- Murder, crime and a lack of opportunities are already soaring at an alarming rate within the community, and the proposal for a Traveller site is disproportionately weighted.

The petition is accompanied by comments from individual people that raised the following issues (numbers in brackets = frequency of issue being raised)

- Effect on facilities for young people (51)
- Effect on community facilities, including the loss of the social club (18)
- Perceptions of travelling community (12)
- Impact on a community already experiencing high levels of crime and other problems (10)
- Investment is needed for the existing local community / the proposal will not benefit the estate (9)
- Site alternatives (4)
- Views on accommodation needs for travelling community (3)
- The number of existing traveller sites in the area (2)
- Number of people in the area already (2)
- Potential impact on property value (1)
- Use of taxpayers' money (1)

**(2) Wheelshunters Club (opposing New Cross site)**

The petition signed by 61 people states:

“We the undersigned as members and supporters of the Wheelshunters Club SE15 1HB. We have read the attached statement and agree with it wholeheartedly”

Summary of main issues raised:

- Loss of a family-friendly meeting space and services for the local community, including (social club members, faith groups, travelling community, older people and young people)
- Loss of jobs and housing for existing employees and caretaker.
- The number of existing traveller sites in the area
- The Catford site would be better so that the club can continue to service its community

**(3) Pool Court Petition (opposing Pool Court site)**

Petition signed by 57 people.

Dear Neighbours/friends - Last month, you may have seen an advert posted on the lamppost from the Local Authority – Lewisham Gypsy and Traveller – stated that Pool Court is a potential location for at least six permanent pitches. They want to buy the scaffolding under the bridge to access the land at the back. By adding your name below, you are expressing your support and to confirm that you will be adversely affected by this plan”

Summary of main issues raised:

The petition itself simply states that residents will be adversely affected (no specific issues identified). However, it is attached to letter from a resident at Sybil Phoenix House, indicating that it is written on behalf of residents in Pool Court. The letter raises the following issues:

- Residents of Pool Court will be impacted by the proposed change.
- Using the green belt of land between the river and Pool Court as housing. The riverbank is invaluable in improving their lifestyles and only local recreation land near their location.
- The land currently serves as a buffer to reduce the occurrence of flooding for properties 7 through 24.
- The proposal doesn't meet components of the Government's Good Practice Guide: Designing Gypsy and Traveller Sites (2008) and the Government's Planning Policy for Traveller Sites (2012).
  - Site location/selection: perceptions of the traveller community, noise and disturbance
  - Site layout, access and orientation: flood risk, green belt designations, visual and acoustic privacy, social integration, potential road safety risks, access for emergency vehicles, security including vandalism, fly-tipping and unauthorised caravans.
  - Site services and facilities: management of pets including dangerous dogs.
  - Consultation with gypsies and travellers and consideration of proximity to a network of local family support.
  - Consultation with the settled community

- Potential service charge increases at Pool Court.
- Potential increase in insurance premiums.
- Potential effect on walking in the street at night.

## Appendix 10 – Representations received from Councillors

Respondent's name	Comment	Officer Response
Councillor Brenda Dacres	<p>Neither areas are suitable. The area in New Cross particularly so. This area of the borough which already feels forgotten and lacking in facilities. There are innate issues with the area and this will compound those views by removing what little facilities they have.</p> <p>The New Cross site</p> <ul style="list-style-type: none"> <li>• It is very unsuitable. It is a loss of amenities. There is play court area for young people who do not have many facilities. Scotney Hall is closed. This is something that teenagers use. There is only a play area for small kids.</li> <li>• The social club is used by older people and there isn't anything for them to do.</li> <li>• It is unsuitable because it beside a densely-populated area with very little facilities. Where crime is high – need more facilities (not less).</li> <li>• The area has a problem with parked cars and abandoned cars.</li> <li>• The land is not sufficient for what is proposed (including it being in a flood plain).</li> </ul>	<p>Noted. See responses to the New Cross Gate Trust and the Environment Agency.</p>
Councillor Allan Hall on behalf of all Bellingham Councillors	<ul style="list-style-type: none"> <li>• Size and shape of site –appears inadequately small and tokenistic (particularly when Bromley and Southwark have better facilities)</li> <li>• The approved search parameters include that that the proposed land for the site be Council-owned and available now. Land at Poole Court is neither</li> <li>• Loss of business at a time when councils will become reliant on business rates. Land more suited to a scaffolding yard.</li> <li>• The proposal suggests building a community, which will inevitably include children, and placing it on a slim strip of land in a potentially unsafe, flood-prone environment sandwiched between a river and a railway line.</li> <li>• The Natural Environment Research Council (NERC) specifies that Gypsy and Traveller sites should be provided at locations with good</li> </ul>	<p>The Masterplan and Capacity study demonstrates that the potential site could provide at least six traveler pitches.</p> <p>The Mayor and Cabinet report (January 2016) and Potential Sites Report make clear that private land adjoining Council owned land may be considered suitable if it were considered necessary to develop a Council asset. The National Planning Policy for Traveller Sites' notes that to be considered deliverable sites should be available 'now',</p>



Respondent's name	Comment	Officer Response
	<p>access to open space. This location does not comply</p> <ul style="list-style-type: none"> <li>• The average pitch size suggested (400 sqm) is the smallest end of the recommended density rating (London Gypsy &amp; Traveller Unit), concern that this is too small to accommodate roads, turning etc.</li> <li>• Site is a thin, arrow-shaped space with one single point of access at Fordmill Road – does not appear to meet approved criteria for safe vehicular access, or the capability of creating safe vehicular access, for 15m long caravans for parking and turning, including allowing access to emergency services. This could mean disruption/moving around of vehicles to allow deliveries etc.</li> <li>• Question whether the site could include what is needed - a hard standing area for a static caravan, touring caravan and a parking space, plus some capacity to build a single storey amenity, some landscaping/open space and additionally a play area.</li> <li>• The shape and location does not offer much in the way of scope for physical integration with the local community – Concern at proposal to house a third community of under-represented people in this locality of already vulnerable residents.</li> <li>• Bellingham has some of the highest levels of social deprivation throughout the entire borough. Best practice suggests that to allow for better integration and interaction between communities, traveller sites should not be built in socially deprived areas - increased risk of the possibility of local tensions.</li> <li>• Additional stress placed on services which are already operating under pressure, such as health, education and access to employment opportunities. Will there be any consultation with healthcare providers and schools in this area of Bellingham as part of this process?</li> <li>• What provision will there be for electricity and water and how will the Council take care of waste management at the proposed site?</li> <li>• Loss of site of nature conservation value</li> <li>• Concern about flood risk.</li> </ul>	<p>offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. This definition was adopted as Site Selection Criteria 10. Part of the Pool Court site is currently owned by Network Rail, with the possible small addition of current public highway owned by London &amp; Quadrant. Not all the potential site is available 'now', although officers consider that the site is deliverable in that it could be provided within 5 years. In addition, it may be possible to develop the site in phases (with at least 3 pitches on the Council-owned land delivered up to 2021 and at least three further pitches being developed on land currently owned by Network Rail between 2021 and 2031.</p> <p>See response to RHS Site Services Ltd in relation to loss of business space.</p> <p>Officers consider that, subject to detailed design, the site could provide a high-quality and safe environment for the traveler community.</p> <p>See comments on Deprivation and Physical &amp; Social Integration in Appendix 7.</p> <p>See comments on Access and accessibility in Appendix 7.</p>

Respondent's name	Comment	Officer Response
		<p>See comments on Service and infrastructure constraints in Table 14 Appendix 7.</p> <p>See responses to Natural England Environment Agency in relation to flooding/nature conservation (Table 13 Appendix 7).</p>

## Appendix 11: Focus Group Meeting Notes (10-11-16 & 23-11-16)

### Focus group discussion - Resident's Lounge, 37 - 61 Pool Court, Catford Thursday 10th November 2016

Participants 10 residents  
Estella Kelly Oscar Property Manager, L&Q  
Claire Gray Planning Service, LB Lewisham  
Belinda Boerkamp Planning Service, LB Lewisham  
Megan Mellor Crime Enforcement and Regulation Officer, LB Lewisham

#### SUMMARY OF ISSUES RAISED:

##### 1. Perceptions of the Traveller Community

Page 207

It was raised that there are both positive and negative perceptions of traveller communities in information on the internet. Some residential sites appear to be well managed and others aren't. Some appear to have a family leader who manage community relationships while others don't.

Many in the group stated that they are not against the travelling community. As a vulnerable group, including older people and some with a disability, their principle concern is personal safety. Because of either personal experience with unauthorised encampments or reports about travellers on the internet and media, the fear is that pitches would be allocated to traveller families where there are issues of anti-social behaviour. There was concern that a residential site wouldn't be properly managed, there would be anti-social behaviour and any tenancy agreement wouldn't be enforced. It was asked whether the Council had assessed any potential impact on Pool Court residents as a vulnerable group.

- It was also a concern that because of the nature of gypsy & traveller culture where extended families support and look after one another, that the travellers or their visitors might encroach into Pool Court. There was a concern that tenancy agreements and road restrictions wouldn't be enforced.

Potential actions:

- Many of the residents have never met members of the travelling community. Some expressed that they would be interested in meeting the Lewisham Traveller outreach officer and some travellers from the different Gypsy & Traveller communities in Lewisham.
- It was discussed that there would be an opportunity for community discussions/feedback on a draft Pitch Allocation Scheme.

##### 2. Existing Issues

**Security and feelings of safety** - People said they are already afraid to walk around and to have their windows open. There is also an issue with security when entering the property. The concern is that their existing issues with security and feelings of safety would be made worse.

**Fly-tipping** – Fly-tipping in Pool Court is an existing problem. It was raised that some general members of the community may fly-tip more often thinking that the traveller community would be blamed.

**Pool Court parking restrictions** – double yellow lines have been installed on one side of Pool Court. Residents said they had originally requested the Council put them on both sides of the street but they were only put on one side. It was raised that larger vehicles including 2 emergency vehicles can't travel along the road, because of people parking on the unrestricted side of the road. They indicated it was used to park by people visiting a nearby Funeral parlour. It was raised that residents would be concerned about any overspill of vehicles from the property next door and worsen the existing issue.

### 3. Monitoring / Site Management

**How often would the Council monitor what's going on the site?** This includes the following issues:

- Encroachment of any activities onto Pool Court, e.g. vehicles or caravans of travellers or their visitors.
- Waste management

The number of people living on the site. It was a concern that permitted numbers would be exceeded without permission.

**Noise – how would the Council deal with noise?** This includes:

**Music (outdoor/indoor).** How would this be dealt with in the site management arrangements? It was asked whether residents would be able to talk to the Travellers and ask them to turn music down like they sometime ask the scaffolding site to stop banging noises. There is an existing a sense of neighbourliness with the business next door.

**Unsupervised children** – It was raised that their perception is that children within the traveller community are supervised less by adults. It was a concern that unsupervised children might run around unsupervised by parents.

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### Focus group discussion - Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate Wednesday 23rd November 2016

Participants 19 residents  
Valda Trowers Independent Living Officer, Lewisham Homes  
Belinda Boerkamp Planning Service, LB Lewisham  
Michael Westbrook Housing, LB Lewisham  
Megan Mellor Crime Enforcement and Regulation Officer, LB Lewisham

## **SUMMARY OF ISSUES RAISED:**

### **Impact on Community Amenities in the Area**

- It was expressed that kids in the area need somewhere to play. Before the football pen was built, kids played football outside Lewis Silken House against the shutters disturbing residents. If the football pen was removed, would it be relocated on the estate?
- It was raised that there is a need for somewhere for people to meet. The Wheelshunters Club has been used for some community occasions and its replacement would be a loss of amenities for the area.

### **The Number of Traveller Sites in the Area**

- It was raised by one resident that there are several other traveller sites nearby and that there are enough in this area.

### **Perceptions of the Traveller Community**

- Many of the group hadn't previously met members of the travelling community and had questions about gypsy and traveller culture. Because of unauthorised encampments that have been in the area, there were concerns about anti-social behaviour and questions about the difference between unauthorised encampments and a managed permanent traveller site.  
Residents asked what a permanent site would look like and whether travellers would be keen to be a part of the community on the estate.

### **Meeting Housing Needs for All**

- It was questioned by one resident whether the Council is giving preferential treatment to members of the travelling community compared to other residents and asked whether travellers are able to choose where they live unlike other residents.  
• Another resident expressed that as long as there is a roof over someone's head then they would be happy.

### **Site Management**

#### **How would the residential site be managed? This includes:**

- The number of people living on the site. It was a concern that permitted numbers would be exceeded without permission.
- Anti-social behaviour. It was asked if there are any issues on the site how would this be dealt with.

### **Existing Issues**

- **CCTV and feelings of safety** – people said there were issues of existing anti-social behaviour on the estate. Four CCTV cameras have been put in.
- Parking issues - this is an existing issue for residents. Lewisham Homes is responding to this.

## Appendix 12: Lewisham Traveller Forum Meeting Notes (11-10-16)

### Lewisham Traveller Forum

Date: 11 October 2016 (12:00)  
 Venue: Wesley Halls

#### Attendance

Margaret Mongan	Rep
Basil Desousier	Rep
Brenda Downes	GRTU
Claire Gray	LBL
Graham Harrington	LBL
Megan Mellor	LBL
Jon Biddle	Met Police
Susan Hailes	Met Police
Lucy Burrows	Met Police
Ilinca Diaconescu	LGTU

#### Apologies

Lisa Spall	LBL
Frances McAughly	GRTU

#### Planning consultation on sites

**Claire (LBL)** – Explained consultation dates and arrangements, including drop in information sessions.

**Ilinca (LGTU)** – Asked if there were any lessons learnt from past consultations. Brenda mentioned the last public meeting where the meeting was dominated by a few vocal people.

**Claire and Graham (LBL)** – The format is different this time, with drop in sessions, rather than public meetings. The drop-in session format doesn't provide individuals with a platform for dominating discussions, and does provide the format for sharing information and more meaningful discussions of the issues and traveller culture.

**Margaret (Rep)** – Could set up a meeting for travellers to meet the settled community.

**Brenda (GRTO)** – If Cllrs want meetings or to learn more about travellers Brenda can facilitate meetings, depending on traveller availability.

**Jon (Met Police)** – Ward Cllr briefings will be important and they may want to attend the drop-in sessions.

**Brenda (GRTO)** – People will want to talk about illegal encampments, especially near the New Cross site where they have been in high profile locations. Officers need to be prepared for this in discussions.

**Claire (LBL)** – Lisa Spall (LBL) will attend and Jon Biddle (Met Police) would like to attend.

**Ilinca (LGTU)** – LGTU may be able to attend too. Health and Education could attend too. Ilinca suggests it shows support from a range of areas across the Council.

**Graham (LBL)** – Reminder of site selection criteria and process so far: council assets; site size; anywhere in the borough. There has already been one round of consultation on these issues.

Discussion around each of the six sites shortlisted. Hither Green site is privately owned – they could still put in their own planning application.

**Discussion on the detail of the Pool Court site:**

**Ilinca (LGTU)** – Access. Does it have to be through the site? Is it wide enough? It seems an awkward shape. Concerned about noise from the railway lines. Noted that part of the site is owned by Network Rail.

**Brenda (GRTO)** – concerns over emergency vehicle access.

**Graham (LBL)** – Outlined the design guidance in the Local Plan document. Consultation asks for comment on these including flooding issues and the loss of the scaffolding yard and SINC site.

**Discussion on the detail of the New Cross site:**

**Graham (LBL)** – Discussion of the existing uses – social club, MUGA. Council owns the whole site.

**Brenda (GRTO)** – At the last meeting the poor relations between Southwark and Lewisham travellers was discussed. The threat to Southwark sites is development along Old Kent Road. The Ilderton Road site has a high rail embankment adjoining and now Southwark Council are saying it is no longer safe, and the traveller families may need to move. This may make the New Cross site more favourable again. It is too early to dismiss one site, especially given the uncertainty about the future of the surrounding area.

**Ilinca (LGTU)** – Will there be replacement facilities at New Cross for the loss of the MUGA and social club? Brenda – any replacement facilities should be opened before the existing facilities are lost.

**ALL-** Discussion around the waiting list and allocation policy – expect LBL Housing officer to come to a Forum meeting in 2017 – Jan meeting?

**Brenda (GRTO)** - Why is there a delay in the timetable from April to August? Claire – because of the examination process.

### Hate Crimes

**Megan (LBL)** – LBL are supporting Hate Crime awareness week. Encourage reporting all Hate Crimes, can also be reported via an app. Don't have to go to the Police Station and can report anonymously but wouldn't get any feedback. Brenda and the Irish Centre will be a 3<sup>rd</sup> party for reporting and anonymous incidents could be reported through them.

### Speed limit

**Jon (Met Police)** – Speed limit down to 20mph and signs on all roads where it applies.

### Next meetings:

Wednesday 9 November, 10.30am, Wesley Halls



# INTEGRATED IMPACT ASSESSMENT

## Gypsy and Traveller Site(s) Local Plan

Pro Vision

October 2017

Prepared on behalf of: The London Borough of Lewisham



**GYPSY AND TRAVELLER SITE(S) LOCAL PLAN**  
SUSTAINABILITY APPRAISAL  
PROJECT NO. 1403

**PREPARED BY:**  
LAURA COX MRTPI MCIEEM  
ASSOCIATE DIRECTOR

**CHECKED BY:**  
JEREMY HIGGINS MRTPI  
PLANNING DIRECTOR

**DATE:**  
OCTOBER 2017

**PRO VISION**  
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WINCHESTER ROAD  
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CONTENTS

Page

Non-technical summary

1.0	Introduction	1
2.0	Methodology	2
3.0	Context, Baseline and Objectives	10
4.0	Integrated Impact Assessment	26
5.0	Mitigation and Monitoring	36

**Appendices**

Appendix A: Plans, policies and programmes

Appendix B: Baseline information

Appendix C: Sustainability objectives, indicators, targets and monitoring

## Non-technical summary

This document provides a report of the Sustainability Appraisal, Strategic Environmental Assessment and Equalities Analysis Assessment of the Lewisham Gypsy and Traveller Site(s) Local Plan. The purpose of the Integrated Impact Assessment is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Lewisham Gypsy and Traveller Site(s) Local Plan.

This report has been prepared considering the consultation responses to a Scoping Report which has determined the principal matters to be addressed by the Integrated Impact Assessment and comments received on the IIA (August 2016). The scoping process identified the following sustainability issues.

1. To provide sufficient housing and the opportunity to live in a decent home
2. To improve the health of the population
3. To reduce poverty and social exclusion
4. To improve accessibility to leisure facilities, community infrastructure and key local services
5. To reduce crime, antisocial behaviour and the fear of crime
6. To reduce car travel and improve accessibility by sustainable modes of transport
7. To mitigate and adapt to the impact of climate change
8. To improve air quality and water quality, manage water resources and reduce noise and vibration
9. To increase, maintain and enhance open space, biodiversity, flora and fauna
10. To mitigate flood risk
11. To maintain and enhance landscapes and townscapes
12. To conserve and where appropriate enhance the historic environment
13. To minimise the production of waste and increase waste recovery and recycling
14. To encourage sustained economic growth
15. To promote access to employment, education, skills and training

The Integrated Impact Assessment incorporates the requirements of the European Strategic Environmental Assessment Directive (2001/42/EC), which states that a formal assessment should be undertaken of plans and programmes that are likely to have significant effects on the environment. The Integrated Impact Assessment has been prepared taking into account the Council's obligations in relation to the Equalities Act 2010 and the Council's equalities objectives.

The Integrated Impact Assessment process is designed to ensure that planning decisions are made that accord with the principles of sustainable development. The timing of the Integrated Impact Assessment, from the initial stages of the plan-making process, aims to make sure that sustainability considerations are taken into account early in the formulation of policy documents, including the Lewisham Gypsy and Traveller Site(s) Local Plan.

The Integrated Impact Assessment starts with an evaluation of the existing situation and then assesses how the Lewisham Gypsy and Traveller Site(s) Local Plan would affect each aspect of sustainability identified through the scoping process. Impacts are positive, neutral, negative or uncertain.

The two alternative sites for the 6 pitches required in the London Borough of Lewisham set out within the Lewisham Gypsy and Traveller Site(S) Local Plan are New Cross Social Club and the adjoining land, and Land at Pool Court. Land at Pool Court is the London Borough of Lewisham Officer's preferred site.

The provision of gypsy and traveller pitches at New Cross Social Club site could have a detrimental effect on health, social inclusion and accessibility to community infrastructure through the loss of a social club and, potentially, games area space. The provision of gypsy and traveller pitches at Pool Court could have a negative effect on landscape, biodiversity, flora and fauna through the loss of open space.

Proposals for monitoring, to identify significant sustainability effects of implementing the Lewisham Gypsy and Traveller Site(s) Local Plan so that remedial action can be taken if required, are set out in this report.

## 1.0 Introduction

- 1.1 Pro Vision have been instructed by the London Borough of Lewisham to prepare an Integrated Impact Assessment, incorporating a Sustainability Appraisal, Strategic Environmental Assessment and Equalities Analysis Assessment, of the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 1.2 SAs are intended to support the selection of options in the preparation of plans and to provide a mechanism for reviewing alternative options whilst assessing how the plan will contribute to the achievement of sustainable development. This IIA seeks to identify the economic, social and environmental impacts of the potential sites presented in the Lewisham Gypsy and Traveller Site(s) Local Plan. It includes discussion of the likely significant sustainability effects of its implementation and recommendations are made relating to the ways in which potential adverse effects can be reduced or beneficial effects can be enhanced. The report includes proposals for relevant environmental, social and economic indicators to monitor the effects of the implementation of the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 1.3 SAs must incorporate the requirements of the Strategic Environmental Assessment (SEA) Directive to ensure that the significant environmental effects arising from policies, plans and programmes are identified, assessed, mitigated, communicated to decision makers, monitored and that opportunities for public involvement are provided. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment.
- 1.4 The IIA considers the London Borough of Lewisham's obligations in relation to the Equalities Act 2010 and the Council's equalities objectives. The assessment has due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations.
- 1.5 Assessing policies from a sustainability perspective (including environmental, social and economic sustainability) alongside an equalities perspective will enable a holistic assessment of the alternative sites for gypsy and traveller accommodation. There are overlaps in the above assessments and therefore an approach that addresses the statutory requirements for Sustainability Appraisal, Strategic Environmental Assessment and Equalities Impact Assessment into a single integrated assessment will be used.
- 1.6 The Scoping Report, the initial stage of the IIA process, consisted of the collection of baseline data and information on other plans, policies and programmes that could influence the preparation of the Lewisham Gypsy and Traveller Site(s) Local Plan. The data collected was used to identify the key sustainability issues, objectives and targets at multiple spatial scales.
- 1.7 The Gypsy and Traveller Site(s) Local Plan is currently at the Potential Site(s) Regulation 18 (stage 2) consultation stage. The Local Plan will identify and designate land in the borough to accommodate the identified need for sites for Gypsies and Travellers.
- 1.8 Section 2 of this IIA Report provides a detailed description of the methodology for the IIA. The context, baseline and objectives of the IIA are set out in Section 3. The IIA is presented and the significant effects are discussed in Section 4. Measures for mitigation and monitoring are considered in Section 5.

## 2.0 Methodology

### SUSTAINABILITY APPRAISAL

- 2.1 The purpose of the IIA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of development plans. The UK Government Sustainable Development Strategy 2005 defines sustainable development as follows:
- Social progress which meets the needs of everyone;
  - Effective protection of the environment;
  - Prudent use of natural resources; and
  - Maintenance of high and stable levels of economic growth and employment.
- 2.2 The IIA of the Lewisham Gypsy and Traveller Site(s) Local Plan aims to ensure that the principles of sustainability are embedded into the plan-making process, forming an integral part of plan preparation. The IIA takes a long-term view, reflecting global, national, regional and local issues. The IIA identifies opportunities to enhance positive performance and to address negative impacts from an early stage in the process of policy formulation.
- 2.3 The stages which the IIA will follow are based on the Government's Planning Practice Guidance. The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004 have also been used to inform the stages followed. These stages are set out in Table 2.1 below. Stage A of the IIA process is covered within the IIA Scoping Report. This IIA Report documents stages B, C and D. Stage E will be completed following the adoption of the Lewisham Gypsy and Traveller Site(s) Local Plan.

Table 2.1: Stages of IIA

Gypsy and Traveller Site(s) Local Plan: Evidence Gathering and Engagement
<p>IIA Stages and Tasks</p> <p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>1: Identify other relevant policies, plans and programmes, and sustainability objectives</p> <p>2: Collect baseline information</p> <p>3: Identify sustainability issues and problems</p> <p>4: Develop the IIA framework</p> <p>5: Consult the consultation bodies on the scope of the IIA Report</p>
Gypsy and Traveller Site(s) Local Plan: Consult on Local Plan in preparation Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
<p>IIA Stages and Tasks</p> <p>Stage B: Developing and refining alternatives and assessing effects</p> <p>1: Test the Local Plan objectives against the IIA framework</p> <p>2: Develop the Local Plan options including reasonable alternatives</p> <p>3. Evaluate the likely effects of the Local Plan and alternatives</p> <p>4: Consider ways of mitigating adverse effects and maximising beneficial effects</p> <p>5: Propose measures to monitor the significant effects of implementing the Local Plan</p>

Gypsy and Traveller Site(s) Local Plan: Prepare the publication version of the Local Plan
IIA Stages and Tasks Stage C: Prepare the IIA Report
Gypsy and Traveller Site(s) Local Plan: Seek representations on the publication Local Plan (Regulation 19) from consultation bodies and the public
IIA Stages and Tasks Stage D1: Seek representations on the sustainability appraisal report from consultation bodies and the public
Gypsy and Traveller Sites Local Plan: Submit draft Local Plan and supporting documents for independent examination Outcome of examination
IIA Stages and Tasks Stage D2: Consider implications of the outcome of the examination for IIA compliance
Gypsy and Traveller Sites Local Plan: Adoption and Monitoring
IIA Stages and Tasks Stage E: Post adoption reporting and monitoring 1: Prepare and publish post-adoption statement 2: Monitor significant effects of implementing the Local Plan 3: Respond to adverse effects

## THE IIA PROCESS TO DATE

- 2.4 A Scoping Report was prepared by Pro Vision in January 2016, during the evidence gathering and engagement stage of the Lewisham Gypsy and Traveller Site(s) Local Plan. The Scoping Report identified the content and the level of detail of the information to be included in this IIA. The Scoping Report described the background and context, set out the relevant plans, policies and programmes, and established the baseline. This information was used to identify the sustainability requirements, issues and trends in the London Borough of Lewisham and to develop the IIA framework. Natural England, the Environment Agency, Historic England and the Greater London Authority were consulted on the scope of the IIA. Comments were received from Natural England, the Environment Agency and Historic England.
- 2.5 An IIA was completed of a Potential Site(s) Report prepared by the London Borough of Lewisham in August 2016. The IIA considered the comments received from Natural England, the Environment Agency and Historic England on the Scoping Report. Two potential residential traveller sites were identified in the Report, comprising New Cross Social Club and adjoining land, and Land at Pool Court. Statutory public consultation was completed on the Potential Site(s) Report and the August 2016 IIA between 17 October and 30 November 2016. Comments on the IIA were received from the following organisations and individuals. The relevant comments have been considered in the preparation of this IIA Report.
- Historic England;
  - Natural England;
  - Environment Agency;
  - Shontelle Williams Report;
  - Focus Group – 37 to 61 Pool Court;



- Focus Group – Lovelinch Close, New Cross;
  - Outreach Service for Gypsy and Roma Travellers;
  - London Gypsy and Traveller Unit;
  - Phoenix Housing;
  - Housing for Women;
  - London Borough of Lewisham, Director of Public Health;
  - Lewisham Police Partnership Team; and
  - Bellingham Community Project.
- 2.6 Since the publication of the Potential Site(s) Report, minor changes have been made to the boundary of Land at Pool Court, with the site now running parallel to the river.
- 2.7 In May 2017, Breeze Landscape Architects carried out a study into the possibility of re-providing a MUGA facility on the hardstanding area next to Upnall House – on the opposite side of Hornshay Street to New Cross Social Club – to replace (in part) the MUGA which would be lost if the proposals at New Cross Social Club and adjoining land are progressed. The study found that this area could accommodate one multi-use games area and a team area of approximately 407sqm or a multi-use games area and separate informal basketball practice area of approximately 323sqm.
- 2.8 BDP completed a masterplan and capacity study relating to each site in June 2017 and found that both sites are capable of accommodating at least 6 pitches. The study also suggests that it would be possible to provide 6 traveller pitches on the potential New Cross site whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement games area was also provided on the hardstanding next to Upnall House, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The study also identifies an option of providing 6 traveller pitches and a replacement multi-use games area on the site of the existing Social Club car park that could possibly retain all facilities and avoid any net loss in space.

## THE IIA APPROACH

### Lewisham Local Plan Regulation 18 Consultation

- 2.9 The policies in the draft Local Plan have been assessed to identify the likely significant effects of the alternative sites (Stage B). Forecasting and evaluation of the significant effects has helped to develop and refine the proposals in the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 2.10 Reasonable alternative sites were identified and considered at an early stage in the plan making process. The assessment of reasonable alternatives has informed the London Borough of Lewisham in choosing its preferred approach. Paragraph 152 of the National Planning Policy Framework was considered in the development of alternatives. Ways of mitigating any adverse effects, maximising beneficial effects and monitoring likely significant effects have been defined.
- 2.11 The IIA has compared the two potential sites for delivering the 6 pitches that Lewisham needs, and has assessed these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted.
- 2.12 The IIA has predicted and evaluated the effects of the two potential sites and has clearly identified the significant positive and negative effects of each alternative. The IIA has identified, described and evaluated the likely significant effects on environmental, economic and social factors using the evidence base. The determination of the likely significant effects on the environment is in line with the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

- 2.13 The IIA has identified any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The IIA has considered all reasonable alternatives and has assessed the two potential sites against the same criteria. The preferred site is then considered in more detail.
- 2.14 The IIA outlines the reasons the sites were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. The IIA provides conclusions on the overall sustainability of the potential sites. The assumptions used in assessing the significance of effects of the Local Plan are documented.
- 2.15 The development and appraisal of the proposals set out in the Lewisham Gypsy and Traveller Site(s) Local Plan is an iterative process. The proposals will be revised to take account of the appraisal findings. This will inform the selection, refinement and publication of the Local Plan.

#### **Prepare the publication version of Lewisham Local Plan**

- 2.16 Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the formal requirements of an 'environmental report', which forms an integral part of the IIA report and is a core output of the SEA. An environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing Lewisham Gypsy and Traveller Site(s) Local Plan policies and of the reasonable alternatives taking into account the objectives and geographical scope of the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 2.17 This IIA report clearly shows how these requirements have been met, in addition to recording the wider assessment of social and economic effects. The IIA includes a non-technical summary of the information within the main report. The summary has been prepared with a range of readers in mind and provides a clear, accessible overview of the process and findings.

#### **Seek representations on the publication Local Plan (regulation 19)**

- 2.18 The consultation bodies, and other parties who are affected, or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the Lewisham Gypsy and Traveller Site(s) Local Plan will continue to be consulted, in line with Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004. This IIA Report, including the non-technical summary, will be published alongside the Lewisham Gypsy and Traveller Site(s) Local Plan for a minimum of six weeks.
- 2.19 This IIA Report will not necessarily have to be amended if the Lewisham Gypsy and Traveller Site(s) Local Plan is modified following responses to consultation. Modifications to the IIA will be considered where appropriate and proportionate to the level of change being made to the Local Plan. A change is likely to be significant if it substantially alters the Local Plan and / or is likely to give rise to significant effects.
- 2.20 Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the IIA may also be required in such circumstances, but this will only be undertaken where necessary. Changes to the Local Plan that are not significant will not result in further IIA work.

#### **Lewisham Local Plan Examination**

- 2.21 This IIA Report will be submitted with the Lewisham Gypsy and Traveller Site(s) Local Plan to the Secretary of State for independent examination. This IIA Report will be examined as part of the evidence base for the Lewisham Gypsy and Traveller Site(s) Local Plan. The IIA Report will help integrate the different areas of evidence and will demonstrate why the site in the Local Plan is the most appropriate. If the necessary changes to the Local Plan resulting from Examination are significant, and were not previously subject to IIA, then further IIA may be required and the IIA Report will be updated and amended accordingly.

### Lewisham Local Plan Adoption and Monitoring

- 2.22 Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the relevant post-adoption requirements. The significant effects of implementing the Gypsy and Traveller Site(s) Local Plan will be monitored (as required by Regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004). This will enable the London Borough of Lewisham to identify unforeseen adverse effects at an early stage and enable appropriate remedial actions.
- 2.23 Details of monitoring arrangements will be included in the post-adoption statement. The monitoring results will be reported in the London Borough of Lewisham's Annual Monitoring Report.

### STRATEGIC ENVIRONMENTAL ASSESSMENT

- 2.24 This IIA has, where appropriate, incorporated the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC). The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. The Directive has been transferred into UK law through the SEA Regulations (July 2004).
- 2.25 The SEA Directive focusses exclusively on environmental issues, whilst IIA also encompasses social and economic concerns. Government guidance on SA has been prepared to meet the requirements of the SEA Directive. Consistent with this approach, the IIA of the Gypsy and Traveller Sites Local Plan addresses the requirements of the SEA Directive.

Table 2.2 The requirements of the SEA Directive

SEA Directive Requirements	Where reported
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is: (Art. 5 and Annex I)	This IIA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Scoping Report January 2016, Section 3 and Appendix A of this report
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report January 2016, Section 3 and Appendix B of this report
c) The environmental characteristics of areas likely to be significantly affected;	Scoping Report January 2016, Section 3 and Appendix B of this report
d) Any existing environmental problems which are relevant to the plan programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report January 2016, Section 3 and Appendix B of this report

<p>e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;</p>	<p>Scoping Report January 2016, Section 3, Section 4 and Appendix A of this report</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p>Section 4 of this report</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>Section 5 of this report</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Sections 2 and 3 of this report</p>
<p>i) A description of measures envisaged concerning monitoring in accordance with Article 10;</p>	<p>Section 5 and Appendix C of this report</p>
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p> <p>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</p>	<p>N/A</p>

<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process</p>
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted;</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art. 9 and 10).</p>	<p>The Adoption Statement documents how environmental considerations have been integrated into the Lewisham Gypsy and Traveller Site(s) Local Plan</p> <p>Section 5 and Appendix C set out the proposed measures for monitoring</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	<p>Section 5 and Appendix C of this report</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This table identifies how the requirements of the SEA Directive have been met</p>

## EQUALITIES ANALYSIS ASSESSMENT

- 2.26 Public bodies are legally required to consider the aims of the public-sector equality duty and document their findings as part of the decision-making process. The three aims that public bodies are required to have due regard to when decision making are:
- To eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
  - To advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
  - To foster good relations between people who share a protected characteristic and people who do not share it.
- 2.27 In order to give the required due regard to the above aims of the public-sector equality duty, Lewisham Council undertakes EAA when changing the way a service is delivered.
- 2.28 EAA is the process of systematically analysing a proposed or existing policy to identify the likely affect from the implementation of the policy on different groups in the community. EAA seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The EAA process ensures that decisions and services meet the needs of local communities. Local Authorities have a duty to complete an EAA of relevant plans under the Equality Act, introduced by central government in October 2010.

- 2.29 The IIA of the Lewisham Gypsy and Traveller(s) Sites Local Plan encompasses the requirements for EAA. The diverse needs of the Lewisham community have been considered during the production of the IIA. The methodology and the approach set out within the London Borough of Lewisham's EAA toolkit has been followed in the preparation of the IIA. The baseline analysis has included an assessment of data and research. Consultation on the IIA has met the requirements for consultation in relation to EAA. The impact assessment has included due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations. Proposed measures for monitoring and mitigation reflect the objectives of EAA.

#### LIMITATIONS AND ASSUMPTIONS

- 2.30 The data relates to the London Borough of Lewisham as a whole. The following gaps in available baseline data have been identified.
- Number of developments granted planning permission incorporating renewable energy solutions;
  - Total energy used in the borough from renewable schemes;
  - Number and location of healthcare facilities;
  - New affordable housing as a percentage of all new housing;
  - Tenure mix of affordable housing;
  - Number of bedrooms in new dwellings;
  - Planning applications obtaining new open space or public access linkages per year;
  - Number of planning applications approved with waste management / recycling facilities incorporated; and
  - Specific data covering public rights of way, cycle parking and lighting.
- 2.31 Gaps in baseline data will be addressed through the ongoing monitoring processes of the Council's Annual Monitoring Report.

## 3.0 Context, Baseline and Objectives

### **LONDON BOROUGH OF LEWISHAM LOCAL PLAN**

3.1 The Local Plan represents a series of planning documents, which collectively outline planning strategy and policies for the London Borough of Lewisham. Local Plan documents can be procedural or policy based.

3.2 The following procedural documents have been approved or adopted by the London Borough of Lewisham:

- Local Development Scheme (LDS) – the LDS sets out an outline of the documents Lewisham propose to prepare and the timetable for the preparation of the various documents;
- Statement of Community Involvement (SCI) – the SCI aims to ensure that local communities know when, how and for what reason a consultation is to happen. The SCI sets out the type, extent and timing of consultation in relation to planning matters in the borough;
- Annual Monitoring Report (AMR) – the AMR sets out information on whether the Council is meeting, or on track to meet, the key dates for Local Plan preparation and whether the policies in the development plan are achieving what they set out to achieve.

3.3 Policy based documents and their status are described below:

- Lewisham Core Strategy (LCS) – the principal and overarching Local Plan document, adopted in June 2011;
- Lewisham Site Allocations Local Plan (LSALP) – identifies, designates and safeguards land for a particular use, adopted in June 2013;
- Lewisham Development Management Local Plan (LDMLP) – sets out additional planning policies to guide decisions on planning applications, adopted in November 2014;
- Lewisham Gypsy and Traveller Site(s) Local Plan (LGTSLP) – will allocate a site or sites to accommodate Gypsies and Travellers in the borough;
- Lewisham Town Centre Local Plan (LTCLP) – policies and proposals for development in Lewisham town centre, this was adopted on 26 February 2014;
- Supplementary Planning Documents (SPD's) – advice and guidance on policies and proposals contained in the development plan; and
- Neighbourhood Plans – the vision and policy for how local people would like their area to develop. None as yet, although 5 forums have been established and have expressed an interest in preparing a neighbourhood plan.

3.4 The Council is in the process of preparing a new integrated Local Plan which will eventually replace the existing Core Strategy, Site Allocations, Lewisham Town Centre and Development Management Local Plans.

### **LEWISHAM GYPSY AND TRAVELLER SITE(S) LOCAL PLAN**

3.5 Given the pressing need to provide traveller accommodation, the Council is developing a standalone Gypsy and Traveller Site(s) Local Plan that will sit alongside the integrated Local Plan. The Lewisham Gypsy and Traveller Site(s) Local Plan is being prepared to allocate a site, or sites, to accommodate Gypsies and Travellers in the London Borough of Lewisham, as specified in adopted Core Strategy Policy 2: Gypsies and Travellers.

- 3.6 The Lewisham Gypsy and Traveller Accommodation Needs Assessment (LGTANA) (2015) as updated August 2016 found that the provision needed to 2030 in Lewisham is for 6 pitches. Since the publication of the GTANA (2015), the Government published its revised policy on planning for traveller sites (2015). This includes a new definition of gypsy and travellers for planning policy purposes. To ensure a robust assessment of need, the GTANA (2016) identifies a need for 6 pitches up to 2031.
- 3.7 The Local Plan will provide site and development information, and guidance for the allocated site or sites, expanding on the criteria set out in adopted Core Strategy Policy 2. Two sites have been proposed as alternatives for delivering at least 6 pitches to provide for Lewisham's identified need.
- 3.8 The two sites comprise New Cross Social Club and the adjoining land, and Land at Pool Court. New Cross Social Club is currently in use as a licensed bar and hall, with car parking. Land at Pool Court comprises two parcels of vacant open land and a scaffolding yard.
- 3.9 The chosen site is likely to be designed and developed to accommodate at least 6 pitches of varying sizes to meet the needs of those households that have the greatest housing need and are top of the Council's waiting list for pitches. Pitches are likely to include a hardstanding area for a static caravan, touring caravan and parking space. Pitches are also expected to include a single-storey amenity building and some landscaping / open space. It is hoped that there would also be an area of communal play / open meeting space on the site.

#### PLANS, POLICIES AND PROGRAMMES

- 3.10 This section summarises plans, policies, programmes and related sustainability objectives established at other levels of the planning system that are relevant to the IIA of the Lewisham Gypsy and Traveller Site(s) Local Plan. International, European, National, London wide and Lewisham based plans and strategies are considered where they are relevant.
- 3.11 Table 3.1 provides a list of those reviewed in the context of the Lewisham Gypsy and Traveller Site(s) Local Plan. Appendix A provides further detail, explaining the plans, policies and programmes relevance to the Lewisham Gypsy and Traveller Site(s) Local Plan and the IIA, and how they have been considered during the IIA process.

Table 3.1: Plans, Policies and Programmes

Plans, Policies and Programmes
International
<ul style="list-style-type: none"> <li>• The Johannesburg Declaration on Sustainable Development (2002)</li> <li>• The Kyoto Agreement (1997)</li> <li>• Convention concerning the Protection of the World Cultural and Natural Heritage (1972) (UNESCO)</li> <li>• Agenda 21 Declaration, UNCED Rio de Janeiro (1992)</li> <li>• Convention on Biological Diversity, Rio de Janeiro (1992)</li> </ul>
European
<ul style="list-style-type: none"> <li>• SEA Directive 2001/42/EC</li> <li>• European Sustainable Development Strategy (2001) (Reviewed in 2009)</li> <li>• European Spatial Declaration on Sustainable Development (1999)</li> <li>• European Spatial Development Perspective (1999)</li> <li>• European Directive 92/43/EEC (&amp; 97/62/EC) on the conservation of natural habitats and of wild fauna and flora</li> </ul>



- European Directive on Conservation of Wild Birds 2009 (2009/147/EC)
- European Directive 2002/49/EC (Noise)
- European Directive on Ambient Air Quality Assessment and Management (96/62/EC) and daughter directives
- European Directive 2000/60/EC (Water Framework Directive)
- EU Community Biodiversity Strategy 2012-2020
- EU Landfill Directive (99/31/EC)
- European Waste Framework Directive (2008/98/EC)
- Directive 2003/87/EC (establishing a scheme for greenhouse gas emission allowance trading)
- EU Seventh Environmental Action Plan 2013-2020

#### National

- National Planning Policy Framework (2012)
- National Policy on Planning for Traveller Sites (2015)
- National Planning Practice Guidance (2014)
- Environmental Assessment of Plans & Programmes Regulations (2004)
- The Housing and Planning Act (2016)
- Housing White Paper (2017)
- Planning and Compulsory Purchase Act (2004)
- Town and Country Planning Act (1990)
- Housing Act (2004)
- Planning and Energy Act (2008)
- Climate Change Act (2008)
- The Equalities Act (2010)
- Noise Policy Statement for England (2010)
- UK Air Quality Strategy 'Working together for clean air' (Defra 2007)
- Energy White Paper 2003 'Our energy, our future, creating a low carbon economy'
- Environment Agency, Creating a better place strategy 2010-2015
- Thames Catchment Flood Management Plan and TE2100 Plan 2012
- Thames River Basin Management Plan (2009)
- Climate Change and the Historic Environment (English Heritage, 2007)
- Building in Context (English Heritage, CABE 2007)
- Seeing History in the View (English Heritage 2010, revised in 2012)
- Streets for All (English Heritage, 2006)
- Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (Historic England, 2013)

- UK Climate Change Risk Assessment: Government Report (Defra, 2012)
- National Adaption Programme – Making the country resilient to a changing climate (Defra, 2013)
- Working with Natural Processes to Manage Flood and Coastal Erosion Risk (EA, 2010)
- National Flood Emergency Framework for England (Defra, 2011)
- Greater working with Natural Processes to Manage Flood and Coastal Erosion Risk (EA, 2012)
- Our River Habitats – River Habitats in the Thames River Basin District: Current State and Character (EA, 2010)
- Designing Gypsy and Traveller Sites: Good Practice Guide (2008)
- Strategic Environmental Assessment and the Historic Environment (English Heritage)
- Gypsy and Traveller Accommodation Needs and Assessment: Guidance (2007)
- Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (2008)
- National Flood and Coast Erosion Management Strategy (July 2011)
- Civil Contingencies Act 2004
- Localism Act 2011
- Growth and Infrastructure Act 2013
- River Basin Management Plan 2015
- National Waste Plan and Prevention Programme
- The Water White Paper – Water for Life
- Environment Agency Classification of Water Stressed Areas
- Water Resource Management Plans
- Groundwater Protection: Principles and Practice
- Guiding Principles for Land Contamination
- Climate Change Adaptation Manual
- Catchment Abstraction Management Strategies
- Water Stress Classification
- Climate Change Information for each River Basin District
- Biodiversity Planning Toolkit
- Equality and Human Rights Commission (EHRC) 2016, Is England Fairer? England's most disadvantaged groups: Gypsies, Travellers and Roma
- EHRC 2016, Race report: Healing a divided Britain
- Traveller Movement, 2016, Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health

London
<ul style="list-style-type: none"> <li>• The London Plan (March 2016)</li> <li>• London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008)</li> <li>• The Mayor's Air Quality Strategy (2010) and Progress Report July 2015</li> <li>• The Mayor's Economic Development Strategy (2010)</li> <li>• The Mayor's Biodiversity Action Plan 2010-2015</li> <li>• The Mayor's Cultural Strategy (2014)</li> <li>• The Mayor's Climate Change Adaptation Strategy (2011)</li> <li>• The Mayor's Transport Strategy (2010)</li> <li>• Mayor of London's Municipal Waste Management Strategy (2011)</li> <li>• Mayor's Ambient Noise Strategy (2004)</li> <li>• London Housing Strategy (2014)</li> <li>• London Tree and Woodland Framework (2005)</li> <li>• Revised London View Management Framework SPG (2010)</li> <li>• The London Rivers Action Plan (2009)</li> <li>• Mayor's Best Practice Guidance on Health Issues in Planning (2007)</li> <li>• Mayor's Supplementary Guidance Sustainable Design and Construction (2014)</li> <li>• Mayor's Supplementary Guidance Accessible London: Achieving an inclusive environment (2014)</li> <li>• Mayor's Supplementary Guidance Providing for Children and Young People's Play and Informal Recreation (2012)</li> <li>• Shaping Neighbourhoods: Character and Context (2014)</li> <li>• London Planning Statement (2014)</li> <li>• Housing in London (March 2016)</li> <li>• All London Green Grid (2012)</li> <li>• London's Foundations (2012)</li> <li>• London Housing Supplementary Planning Guidance (March 2016)</li> <li>• Homes for Londoners - Affordable Housing and Viability Supplementary Planning Guidance (August 2017)</li> <li>• London Land for Industry and Transport Supplementary Planning Guidance (2012)</li> <li>• London Social Infrastructure Supplementary Planning Guidance (2015)</li> </ul>
Lewisham
<ul style="list-style-type: none"> <li>• Lewisham Gypsy and Traveller Accommodation Needs Assessment (2015), as updated August 2016</li> <li>• Lewisham Sustainable Community Strategy 2008-2028</li> </ul>

- Lewisham Core Strategy (2011)
- Community Safety Strategy 2012-2017
- Safer Lewisham Plan 2013-2014
- Corporate Plan 2008-2011
- Lewisham Regeneration Strategy 2008-2020
- Lewisham Housing Strategy 2015 -2020
- Lewisham Municipal Waste Strategy
- Lewisham Children and Young People's Plan 2012-2015
- Lewisham Carbon Reduction and Climate Change Strategy (2008)
- Social Inclusion Strategy 2005-13
- Healthier Communities – A health and well-being framework for Lewisham (2007-2010)
- Lewisham Leisure and Open Space Study (2010)
- Local Biodiversity Action Plan – A Natural Renaissance for Lewisham 2006-2011
- Comprehensive Equalities Scheme 2016-2020
- Better futures: Lewisham's Homelessness Prevention Strategy 2009-2014
- Lewisham Borough Sports Plan 2010-13
- Lewisham Local Air Quality Action Plan (2008)
- Lewisham Strategic Flood Risk Assessment (2008)
- Lewisham Strategic Flood Risk Assessment Update (2015)
- Lewisham Flood Risk and Development Sequential Test (2009)
- Lewisham Surface Water Management Plan (April 2011)
- Lewisham Local Implementation Plan (Transport) 2010) (LIP)
- Lewisham Strategic Housing Market Assessment 2008 and the South-East London Sub-regional SHMA (2009)
- Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA) (2009)
- Lewisham Health and Wellbeing Strategy (2015)
- Lewisham Conservation Area Management Plans
- Lewisham Borough Wide Character Study (2010)
- Control of Pollution and Noise from Demolition and Construction Sites Code of Practice May (2008)
- Creative Lewisham – Lewisham Cultural and Urban Development Commission 2009-2013
- Control of Pollution and Noise from Demolition Construction Sites Code of Practice May (2008)
- Healthy Weight Healthy Lives (PCT with LB Lewisham) (2009)

- Creative Lewisham – Lewisham Cultural and Urban Development Commission 2009-2013
- Control of Pollution and Noise from Demolition Construction Sites Code of Practice May (2008)
- Lewisham River Corridor Improvement Plan (2015)
- Lewisham Planning Obligations SPD (2015)
- Lewisham Bromley Road Supplementary Planning Document (2009)
- Hatcham Conservation Area Character Appraisal (2006)
- Culverley Green Conservation Area Character Appraisal (2001)

### CURRENT AND PREDICTED FUTURE SOCIAL, ECONOMIC AND ENVIRONMENTAL BASELINE CHARACTERISTICS

- 3.12 The baseline outlines the current and likely future state of the London Borough of Lewisham. The baseline provides the context for predicting and monitoring the impacts of the Lewisham Gypsy and Traveller Site(s) Local Plan. The baseline assessment supports the identification of the sustainability issues in the London Borough of Lewisham relevant to the Lewisham Gypsy and Traveller Site(s) Local Plan. The baseline information was reported in the Scoping Report January 2016. The updated relevant information is set out in Appendix B.
- 3.13 The baseline data and the policy context have been used to identify the relevant requirements, the current issues and the likely future trends in the London Borough of Lewisham. In some cases, there are constraints which must be overcome, or impacts which must be avoided. In other cases, the baseline presents opportunities.
- 3.14 The general sustainability issues for the Lewisham Gypsy and Traveller Site(s) Local Plan have been identified and are presented under broad themes in Table 3.2, below.

Table 3.2 Sustainability Requirements, Issues and Trends

Key issues	Source
Social Progress that meets the needs of Everyone	
<p>The population, including the Gypsy and Traveller population, is expected to rise. Lewisham must make provision for additional pitches to accommodate Gypsies and Travellers.</p> <p>The demand for affordable housing in Lewisham is very high.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Housing Act (2004)</p> <p>The Housing and Planning Act (2016)</p> <p>The London Plan (March 2016)</p> <p>London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008)</p> <p>London Housing Strategy (2010)</p> <p>Housing in London (2016)</p> <p>Lewisham Core Strategy (2011)</p> <p>Lewisham Housing Strategy 2015 -2020</p> <p>Lewisham Gypsy and Traveller Accommodation Needs Assessment (2015) as updated August 2016</p>

<p>The health of the Gypsy and Traveller population is an essential consideration, including access to healthcare and opportunities for healthy lifestyles.</p>	<p>National Planning Policy Framework (2012)  National Policy on Planning for Traveller Sites (2015)  The London Plan (March 2016)  Healthier Communities – A health and well-being framework for Lewisham (2007-2010)  Equality and Human Rights Commission (EHRC) 2016, Is England Fairer? England’s most disadvantaged groups: Gypsies, Travellers and Roma  EHRC 2016, Race report: Healing a divided Britain  Traveller Movement, 2016, Impact of insecure accommodation and the living environment on Gypsies’ and Travellers’ health</p>
<p>There are areas with high levels of poverty and social deprivation in the London Borough of Lewisham.</p>	<p>Mayor’s Supplementary Guidance  Accessible London: Achieving an inclusive environment  Social Inclusion Strategy 2005-13</p>
<p>Gypsy and Traveller sites must be located where there is good access to leisure facilities, community infrastructure and key local services.  The environment should encourage walking and cycling.</p>	<p>National Planning Policy Framework (2012)  National Policy on Planning for Traveller Sites (2015)  The London Plan (March 2016)  Lewisham Core Strategy (2011)</p>
<p>Crime, antisocial behavior and fear of crime are important considerations.  A safe environment should be created, with high quality, people friendly spaces.  Pedestrian movements, lighting and improvements to unsafe areas should be considered.</p>	<p>Lewisham Sustainable Community Strategy 2008-2020  Community Safety Strategy 2008-2011  Safer Lewisham Plan 2013-2014</p>
<p>Lewisham is the 15<sup>th</sup> most ethnically diverse local authority in England and 130 different languages are spoken.</p>	<p>Lewisham Regeneration Strategy 2008-2020</p>

Effective protection of the Environment and prudent use of resources	
<p>Gypsy and Traveller sites should be located in areas with good access to sustainable transport.</p> <p>Public transport needs to be made more appealing and car movements and car parking better managed.</p> <p>With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.</p> <p>There is a need to reduce pollution from transport, particularly private cars.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>The London Plan (March 2016)</p> <p>The Mayor's Transport Strategy (2010)</p> <p>Lewisham Core Strategy (2011)</p> <p>Lewisham Local Implementation Plan (Transport) (2010) (LIP)</p>
<p>Climatic change due to greenhouse gas emissions from fossil fuel use is likely to affect the natural environment.</p> <p>Viable decentralised renewable energy networks should be developed where applicable to supply energy to Gypsy and Traveller sites. There is a need to increase the proportion of energy used from renewable resources.</p> <p>Climate change may result in increased frequency of flooding. Damage to rural roads and overloading of sewers may become more commonplace.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Planning and Energy Act (2008)</p> <p>Climate Change Act (2008)</p> <p>Energy White Paper (2003)</p> <p>The London Plan (March 2016)</p> <p>London Climate Change Adaptation Strategy (2008)</p> <p>Lewisham Carbon Reduction and Climate Change Strategy (2008)</p> <p>Department for Energy and Climate Change</p>
<p>Water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance.</p> <p>The Air Quality Strategy objectives should be adhered to, particularly within the London Borough of Lewisham's five Air Quality Management Areas.</p> <p>The relationship between high noise sources and Gypsy and Traveller sites should be considered.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Noise Policy Statement for England (2010)</p> <p>UK Air Quality Strategy (DEFRA 2007)</p> <p>The London Plan (March 2016)</p> <p>The Mayor's Air Quality Strategy (2010)</p> <p>Mayor's Ambient Noise Strategy</p> <p>Thames Water Resources Management Plan</p> <p>Lewisham Local Air Quality Action Plan (2008)</p> <p>Lewisham Assessment of Air Quality (2009)</p> <p>Lewisham Strategic Flood Risk Assessment (2008)</p>

<p>Gypsy and Traveller sites should be provided at locations with good access to open space. The adequacy and quality of open space should be considered.</p> <p>The provision of Gypsy and Traveller sites should be balanced with the protection of designated nature conservation sites, biodiversity, flora and fauna.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>The London Plan (March 2016)</p> <p>The Mayor's Biodiversity Action Plan 2010-2015</p> <p>Lewisham Core Strategy (2011)</p> <p>Local Biodiversity Action Plan – A Natural Renaissance for Lewisham 2006-2011</p> <p>Lewisham Leisure and Open Space Study (2010)</p>
<p>Gypsy and Traveller sites should be allocated avoiding areas at risk of flooding.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Thames Catchment Flood Management Plan</p> <p>Thames River Basin Management Plan (2009)</p> <p>The London Plan (March 2016)</p>
<p>There are areas of Lewisham which require an improved image, in terms of design and the built form.</p> <p>The design of the natural environment requires consideration in terms of open space.</p> <p>Spaces and places need to be of high design quality, respecting historical features and promoting local distinctiveness, providing access for all.</p> <p>There is a need to address linkages between design and achieving objectives for the delivery of Gypsy and Traveller sites.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Designing Gypsy and Traveller Sites: Good Practice Guide (2008)</p> <p>The London Plan (March 2016)</p> <p>Mayor's Supplementary Guidance Sustainable Design and Construction (2014)</p> <p>Lewisham Core Strategy (2011)</p>
<p>The provision of Gypsy and Traveller sites should be balanced with the need to protect listed buildings, conservation areas and other heritage assets, respecting the architectural identity and character of the Borough.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>English Heritage documents</p> <p>The London Plan (March 2016)</p> <p>London's Foundations (2012)</p> <p>Lewisham Core Strategy (2011)</p> <p>Hatcham Conservation Area Character Appraisal (2006)</p> <p>Culverley Green Conservation Area Character Appraisal (2001)</p>



Waste generation should be reduced and recycling rates should be improved.	Mayor of London's Municipal Waste Management Strategy (2008) Lewisham Municipal Waste Strategy
Maintenance of high and stable levels of economic growth	
Sustained economic growth is essential as Lewisham's underlying economy is one of the smallest in London. The provision of Gypsy and Traveller sites should be balanced with the provision of employment land, particularly for small and medium size enterprises.	National Planning Policy Framework (2012) National Policy on Planning for Traveller Sites (2015) The London Plan (March 2016) The Mayor's Economic Development Strategy (2010) Lewisham Core Strategy (2011)
Access to education, skills and training is vital, as 25% of the population of Lewisham has no qualifications. A linkage with apprentice schemes needs to be considered.	The Mayor's Economic Development Strategy (2010)
Gypsy and Traveller sites should be provided at locations with good access to employment.	National Planning Policy Framework (2012) National Policy on Planning for Traveller Sites (2015) The London Plan (March 2016) The Mayor's Economic Development Strategy (2010) Lewisham Core Strategy (2011)

### SUSTAINABILITY OBJECTIVES, TARGETS AND INDICATORS

- 3.15 The sustainability objectives provide a method for describing, analysing and comparing the sustainability effects of the Lewisham Gypsy and Traveller Site(s) Local Plan. A series of sustainability objectives were developed at the scoping stage, taking into account the relationship between the Lewisham Gypsy and Traveller Site(s) Local Plan and the objectives of other plans and programmes, along with the findings of the baseline information review. The sustainability objectives were developed and consulted on as part of the scoping process. These objectives have been refined to reflect the changing sustainability concerns in the borough.
- 3.16 The objectives are supported by specific, measurable, achievable, realistic and time related (SMART) indicators. The objectives and indicators facilitate the comparison of options, the prediction and assessment of impacts and monitoring. The IIA framework focusses on areas where significant effects are likely. The sustainability objectives and indicators are presented in Table 3.3 below.

Table 3.3: IIA objectives and indicators

IIA Objective	Indicator
Social	
1. To provide sufficient housing and the opportunity to live in a decent home	Number of housing completions Gypsy and Traveller pitches Number of affordable housing completions (by tenure type) Mix of housing tenure Mix of dwelling type and size Provision of student/other specialist housing Number of households in housing need
2. To improve the health of the population	Households with limiting long-term illness Mortality rate from circulatory diseases at age under 75 Mortality rate from all cancers at age 75 or under Health life expectancy at age 65 Number of people taking part in activities that improve physical and mental health in the borough Indices of deprivation: health deprivation and disability; barriers to housing and services domain; and living environment domains
3. To reduce poverty and social exclusion	Number of recorded racial incidents Indices of Multiple Deprivation 2015: Employment and Income Domains Children in Poverty (under 16s)
4. To improve accessibility to leisure facilities, community infrastructure and key local services	Gain/loss of community/recreational facilities Delivery of identified social infrastructure Funding for community facility improvements secured
5. To reduce crime, antisocial behavior and the fear of crime	Number of schemes incorporating 'secured by design' Indices of deprivation: Crime domain Number of offences per 1,000 population Numbers of types of crime per annum (Metropolitan Police) Reports of anti-social behavior (Metropolitan Police)

	<p>Indicators for the following:</p> <ul style="list-style-type: none"> <li>• Violence against the person;</li> <li>• Burglaries;</li> <li>• Robberies;</li> <li>• Violent crime;</li> <li>• Sexual offences.</li> </ul>
Environmental	
6. To reduce car travel and improve accessibility by sustainable modes of transport	<p>Number of car parking spaces delivered in new development</p> <p>Number of completed car limited developments</p> <p>Number of car clubs and parking bays</p> <p>% of permitted major developments with a travel plan</p> <p>Proportion of journeys made on foot and by bicycle</p> <p>Number of electric car charging points</p> <p>Improvements to legibility and signage</p> <p>Improved pedestrian and cycle routes and crossings</p> <p>Number of cycle parking spaces provided for each new home or other development and public realm</p> <p>Improved lighting and natural surveillance on pedestrian and cycle paths</p> <p>Number of road accident casualties per 1,000 population serious or fatal</p> <p>Public transport accessibility levels</p> <p>Transport related CO2 emissions</p>
7. To mitigate and adapt to the impact of climate change	<p>Number of homes achieving Code for Sustainable Homes level 4 or above granted/completed</p> <p>Number of BREEAM buildings granted/completed</p> <p>Number and capacity of decentralised energy granted/completed</p> <p>Number, type and capacity of renewable energy granted/completed</p> <p>Number and size of living roofs granted/completed</p> <p>Number of new developments incorporating water efficiency measures</p>

<p>8. To improve air quality and water quality, manage water resources and reduce noise and vibration</p>	<p>Water pollution incidents</p> <p>Change in chemical river quality</p> <p>Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</p> <p>LLSOA Electricity and Gas consumption</p> <p>Per capita reductions in CO2</p> <p>Levels exceeding Main Air Pollutant Quality Standards</p> <p>Levels of NO2 and PM10</p> <p>Number of complaints related to noise from roads, construction, maintenance, noisy neighbours and/or other.</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p> <p>Estimated water consumption of new development</p>
<p>9. To increase, maintain and enhance open space, biodiversity, flora and fauna</p>	<p>Area of designated habitats</p> <p>Number and size of biodiverse brown living roofs granted/completed</p> <p>Number of bat and other bird boxes delivered as part of new developments</p> <p>Number of applications granted or refused on designated open space and within SINCs</p> <p>Amount of new or improved open space provided, including that which provides a net gain for biodiversity and accessible natural greenspace</p> <p>Number of new allotments and community gardens</p> <p>Funding secured for open space improvements</p> <p>Waterways created, restored or enhanced</p>
<p>10. To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network</p>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defense grounds or water quality</p> <p>Number of SUDS granted and delivered</p> <p>Flooding incidents</p> <p>Condition of any flood defenses</p>
<p>11. To maintain and enhance landscapes and townscapes</p>	<p>Number of key views maintained and enhanced</p>

	<p>Pre- applications and applications considered by the design review panel</p> <p>Number of interventions aimed at improving streetscapes</p> <p>Density of housing</p>
12. To conserve and where appropriate enhance the historic environment	<p>Number of designated heritage assets (including listed buildings and conservation areas)</p> <p>Number of undesignated heritage assets (locally listed buildings, areas of archaeological significance)</p> <p>% of applications where archaeological strategies were developed and implemented</p> <p>Number of applications that have considered views of strategic importance</p> <p>Number of conservation areas with up to date conservation area character appraisals or at risk (absent conservation area appraisal)</p> <p>Condition of designated and undesignated heritage assets</p>
13. To minimise the production of waste and increase waste recovery and recycling	<p>% of waste recycled, reused or composted</p> <p>Tonnes of waste sent to landfill per year</p> <p>Residual household waste per year</p> <p>Amount of waste recycled on site by residents and employment industries</p>
14. To reduce land contamination and safeguard soil quality and quantity	<p>Number of planning applications with the potential for land contamination</p> <p>Number of identified contaminated sites</p> <p>Number of new homes built on previously developed land</p>
<b>Economic</b>	
15. To encourage sustained economic growth	<p>Area of employment land with mixed use employment location (MEL) and local employment location (LEL)</p> <p>Size and type of employment floorspace</p> <p>Amount of vacant employment floorspace</p> <p>Amount of new completed employment floor space</p> <p>New business registration rate</p> <p>Rent levels of employment accommodation</p>
16. To promote access to employment, education, skills and training	<p>Employee numbers in Lewisham</p> <p>Indices of deprivation: Education, skills and training domain</p>

	<p>% of businesses in the area showing employment growth</p> <p>Job density in Lewisham</p> <p>Number of employed and unemployed living in the area</p> <p>Numbers of employees and business owners who are BME</p> <p>% of population of working age who claim unemployment benefit</p> <p>Number of pupils achieving 5 or more GCSE's at grades A* to C or equivalent</p> <p>% of population aged 16-74 with no qualifications</p> <p>Number of full and part time courses provided</p> <p>Number of full and part time people participating in educational courses/events in the area</p> <p>% of population in Lewisham with higher education qualifications</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p>
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## 4.0 Integrated Impact Assessment

### CORE STRATEGY POLICY 2

- 4.1 The IIA and SEA of the London Borough of Lewisham's Core Strategy included an assessment of Core Strategy Policy 2. The allocation of sites for Gypsies and Travellers was deemed to have a positive sustainability impact on meeting housing need. Impacts dependent on implementation include access to public transport and facilities, respecting the amenity of neighbouring properties and protecting existing habitats and biodiversity.

### ASSESSMENT OF SUITABLE ALTERNATIVES

- 4.2 Sustainability criteria relating to access to facilities and services, access to the road network, land use, health and environmental quality informed the identification of the potential sites from the following list of potential sites. Land ownership, planning considerations and deliverability also informed the site selection process.
- A – Land off Westbourne Drive SE23;
  - B – Land off Turnham Road SE4;
  - C – New Cross Social Club and adjoining land, Hornshay Street SE15;
  - D – Land at rear of 46 – 116 Baizdon Road SE23;
  - E – Land at Pool Court SE6;
  - F – Land at St Mildred's Road, Hither Green SE12.

### SUSTAINABILITY APPRAISAL

- 4.3 It is important that the Lewisham Gypsy and Traveller Site(s) Local Plan is in accordance with sustainability principles. The potential sites, C – New Cross Social Club and adjoining land, and E – Pool Court, have been assessed in accordance with the SEA Directive and related UK regulations. The likely significant effects on the environment of implementing the Lewisham Gypsy and Traveller Site(s) Local Plan are identified, evaluated and described in Tables 4.2 and 4.3. An evidence based approach has been adopted to:
- Identify changes to the baseline which are predicted to arise from the implementation of the Lewisham Gypsy and Traveller Site(s) Local Plan;
  - Describe the changes in terms of their magnitude, geographical scale, time period over which they will occur, whether they are permanent or temporary, positive or negative, the level of probability of the effect arising and any secondary, cumulative and / or synergistic effects.
- 4.4 The assessment incorporates EAA. The Lewisham Gypsy and Traveller Site(s) Local Plan has been systematically analysed to identify the effect, or likely effect, of implementation for different groups in the community. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures.
- 4.5 Evidence based predictions and evaluations are both qualitative and quantitative. The sites have been assessed in terms of their impact against the sustainability objectives, to assist in refining the Lewisham Gypsy and Traveller Site(s) Local Plan. The following symbols have been used to assess overall whether the contribution that each site makes in relation to each of the sustainability objectives is positive, negative, neutral or uncertain. The assessments are set out in Tables 4.2 and 4.3.

Table 4.1: Assessment symbols

Symbol	Contribution
√√	Significant positive
√	Positive
0	Neutral
x	Negative
xx	Significant negative
?	Unknown

## NEW CROSS SOCIAL CLUB AND ADJOINING LAND

Table 4.2: Integrated Impact Assessment

IIA Objective	Integrated Impact Assessment	Comments
Social		
1. To provide sufficient housing and the opportunity to live in a decent home	√√	The site has capacity to accommodate the 6 pitches required in the borough up to 2031.
2. To improve the health of the population	√	The proposed site would address some of the inequalities facing the Gypsy and Traveller population, particularly in terms of health. Subject to consultation, the MUGA would be partially or wholly replaced as part of the proposed development. Therefore, the potential negative effect would be wholly or partially counteracted.
3. To reduce poverty and social exclusion	x	The loss of the social club / hall used for community events could have a local negative effect on social exclusion.
4. To improve accessibility to leisure facilities, community infrastructure and key local services	x	The loss of the social club / hall used for community events could have a local negative effect on community infrastructure.
5. To reduce crime, antisocial behavior and the fear of crime	?	The effects on crime, antisocial behavior and fear of crime will be dependent on policy implementation.



Environmental		
6. To reduce car travel and improve accessibility by sustainable modes of transport	√√	The site has convenient access to bus services and the railway network.
7. To mitigate and adapt to the impact of climate change	0	The site will have a neutral effect on climate change. The loss of the social club / hall used for community events may result in a slight negative effect on climate change, as journey lengths will be increased. The site does, however, have good access to public transport, which helps to mitigate the effect.
8. To improve air quality and water quality, manage water resources and reduce noise and vibration	0	The site will not have a significant effect on air, water or noise.
9. To increase, maintain and enhance open space, biodiversity, flora and fauna	√	The proposed tree planting along the boundary with Hornshay Street will enhance biodiversity and flora.
10. To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network	?	The site is within an area at risk from flooding identified by the Environment Agency (Flood Risk Zone 3a – high fluvial flood risk identified). However, based on the presence of existing defenses the actual risk to property is considered low. There is moderate to high surface water flood risk on parts of the site.
11. To maintain and enhance landscapes and townscapes	√	The demolition of the existing buildings and tree planting along Hornshay Road would have a positive effect on the townscape in the medium to long term.
12. To conserve and where appropriate enhance the historic environment	0	The site would have a neutral effect on the historic environment, including Hatcham Conservation Area, which is situated to the south east.

13. To minimise the production of waste and increase waste recovery and recycling	?	Effects on the production of waste and increased waste recovery and recycling will be dependent on implementation of the policy.
14. To reduce land contamination and safeguard soil quality and quantity	0	The site would have a neutral effect on land contamination
Economic		
15. To encourage sustained economic growth	√	The future residents could make a contribution to the local labour market.
16. To promote access to employment, education, skills and training	√	The site has convenient access to local employment and education.

## LAND AT POOL COURT

Table 4.3: Integrated Impact Assessment

IIA Objective	Integrated Impact Assessment	Comments
Social		
1. To provide sufficient housing and the opportunity to live in a decent home	√√	The site has capacity to accommodate the 6 pitches required in the borough up to 2031.
2. To improve the health of the population	0	The preferred site will not have a significant effect on the health of the population. The proposed site would address some of the inequalities facing the Gypsy and Traveller population, particularly in terms of health.
3. To reduce poverty and social exclusion	0	The preferred site will have a neutral effect on poverty and social exclusion. The Traveller Outreach Officer will engage with the local community and the traveller community.
4. To improve accessibility to leisure facilities, community infrastructure and key local services	√	The site has convenient access to local facilities and services.
5. To reduce crime, antisocial behavior and the fear of crime	?	The effects on crime, antisocial behavior and fear of crime will be dependent on policy implementation.
Environmental		
6. To reduce car travel and improve accessibility by sustainable modes of transport	√√	The site has convenient access to bus services and the railway network.
7. To mitigate and adapt to the impact of climate change	0	The preferred site will have a neutral effect on climate change. The hedges, trees and landscaping on the site should be maintained and enhanced where possible, to contribute to climate change mitigation.
8. To improve air quality and water quality, manage water resources and reduce noise and vibration	0	The preferred site will not have a significant effect on air, water or noise.

9. To increase, maintain and enhance open space, biodiversity, flora and fauna	x	The loss of open land could have a local adverse effect on biodiversity, flora and fauna.
10. To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network	?	The preferred site is within an area at risk from flooding identified by the Environment Agency (part in Flood Zone 2, part in Flood Zone 3a). There is a medium risk of fluvial flooding, with a high risk of surface water flooding due to topography, and moderate groundwater risk.  There is a reasonable prospect of the sequential and exceptions tests being met.
11. To maintain and enhance landscapes and townscapes	x	The loss of open land, particularly the area to the north west of Pool Court, could have a local negative landscape effect.
12. To conserve and where appropriate enhance the historic environment	0	The preferred site would have a neutral effect on the historic environment and there would be a very limited impact on the Culverley Green Conservation Area which is adjacent to the site.  The site is located adjacent to an area of known archaeological potential. It is therefore anticipated that archaeological consideration would be required in the event of a planning application.
13. To minimise the production of waste and increase waste recovery and recycling	?	Effects on the production of waste and increased waste recovery and recycling will be dependent on implementation of the policy.
14. To reduce land contamination and safeguard soil quality and quantity	0	The preferred site would have a neutral effect on land contamination.
<b>Economic</b>		
15. To encourage sustained economic growth	√	The future residents could make a contribution to the local labour market.

16. To promote access to employment, education, skills and training	√	The site has convenient access to local employment and education.
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#### FURTHER DETAIL RELATING TO LAND AT POOL COURT

- 4.6 The site is located in Catford, to the south of the River Ravensbourne and to the west of the railway line, at the corner of Pool Court and Fordmill Road. The eastern part of the site is currently used as a scaffolding yard, whilst the western part is vacant open land. There is also the possibility that the site may include a small area of Pool Court itself (currently public highway).
- 4.7 The Land at Pool Court site has been identified by Lewisham Council as the preferred potential site, for further investigation. The main reason for Officers' selection of Land at Pool Court as the preferred potential site was the loss of community space at New Cross Social Club (the social club and possibly the games court area) that the allocation of this site and adjoining land would incur. Pool Court is preferred by the Lewisham Traveller community; It is more self-contained, without being isolated; the site is better suited to relatively low-density housing (suburban character and lower public transport accessibility); it is outside Lewisham's Regeneration and Growth Area and the London Plan Lewisham, Catford and New Cross Opportunity Area, where bricks and mortar housing and employment growth is focused, and it would not result in the loss or displacement of existing community facilities or housing. Loss of community space was considered to have a very negative effect on the IIA objectives, namely IIA 3 and 4. Although the Pool Court site has a few negative impacts on the IIA objectives, it is considered that these effects can be mitigated.
- 4.8 The following builds on the above tabular assessment and provides more detailed consideration of the preferred potential site, Land at Pool Court, against the IIA objectives.

#### **IIA Objective 1 - To provide sufficient housing and the opportunity to live in a decent home**

- 4.9 The Land at Pool Court site would provide the 6 pitches which are required to meet the identified need for Gypsy and Traveller Sites until 2031. The allocation of the site would therefore have a significant positive effect on this IIA objective.
- 4.10 The nine protected characteristics (age, disability, gender, ethnicity, sexual orientation, religion and belief, gender reassignment, pregnancy / maternity and marriage / civil partnership) relating to EAA have been considered in the assessment. All of these protected characteristics will be unaffected by the proposals, aside from the positive effect on the Gypsy and Traveller community (an ethnicity) through the provision of accommodation to meet their needs.

#### **IIA Objective 2 - To improve the health of the population**

- 4.11 The allocation of Land at Pool Court as a Gypsy and Traveller site would not affect the number or distribution of healthcare facilities in the borough. The site is in an easily accessible location, approximately 1 mile, to existing healthcare facilities in Catford. The proposed site would address some of the inequalities facing the Gypsy and Traveller population, particularly in terms of health.

#### **IIA Objective 3 - To reduce poverty and social exclusion**

- 4.12 The site will have a neutral effect on this IIA objective. The Traveller Outreach Officer will engage with the local community and the traveller community to promote social inclusion.

**IIA Objective 4 - To improve accessibility to leisure facilities, community infrastructure and key local services**

- 4.13 Land at Pool Court is located approximately 1km to the south of Catford Town Centre and is within close proximity to existing local facilities and services, including banks, restaurants, supermarkets and a pharmacy. Residents would benefit from good access to these facilities and services. The convenient access to local facilities and services in Catford results in a positive effect on this IIA objective.

**IIA Objective 5 - To reduce crime, antisocial behaviour and the fear of crime**

- 4.14 The effects on levels of crime, antisocial behaviour and the fear of crime of allocating Land at Pool Court as a new Gypsy and Traveller site will depend on the detailed design of the site and the implementation of an expected Allocations and Management policy and a Site Management Plan.

**IIA Objective 6 - To reduce car travel and improve accessibility by sustainable modes of transport**

- 4.15 The preferred site is located in a highly accessible area. The closest bus stop is approximately 100m from the site entrance, Bellingham train station is located 1km to the south east, whilst Catford station is located 900m to the north. The proximity to these sustainable modes of transport enables residents to use non-car based modes of transport with ease. The allocation of this site would have a significant positive effect on this IIA objective.

**IIA Objective 7 - To mitigate and adapt to the impact of climate change**

- 4.16 The allocation of the Land at Pool Court site would have a negligible effect on this IIA objective as the effects will depend on the detailed site design. However, as considered above under objective 6, the site is well located to encourage the use of sustainable transport. In addition, the trees and hedgerows within the site could be maintained and enhanced, where possible, to contribute to reducing the effects of climate change.

**IIA Objective 8 - To improve air quality and water quality, manage water resources and reduce noise and vibration**

- 4.17 This Gypsy and Traveller preferred potential site is likely to have no significant impact on air quality, water quality or noise. The site is a brownfield site and is not located in an area where pollution is managed.

**IIA Objective 9 - To increase, maintain and enhance open space, biodiversity, flora and fauna**

- 4.18 The whole site is within the Pool Court Linear Park Site of Importance for Nature Conservation (SINC) which is of Borough Importance, although the Re-Survey of SINC's 2016 proposes to exclude the eastern (scaffolding yard) from the designation. Planning Policy CS 12 and the Site Allocations Local Plan seek to protect SINC's. The loss of open land could result in a negative effect on the biodiversity of the site. However, this impact could be mitigated by introducing an 8-metre buffer zone with the Ravensbourne River and by incorporating ecological enhancements, such as new habitat (e.g. living roofs / walls); appropriate soft landscaping (native or wildlife species trees / shrubs); nesting boxes for birds / bats / insects; and dead wood habitat (stag beetle log piles).

**IIA Objective 10 - To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network**

4.19 As detailed in the above table, the preferred site is located partly within Flood Zone 2 and partly within Flood Zone 3a. This is an area at risk from flooding identified by the Environment Agency. There is a medium risk of fluvial flooding, with a high risk of surface water flooding due to topography, and moderate groundwater risk. Therefore, the site presents a minor negative effect on this IIA objective. However, there is a reasonable prospect of the sequential and exceptions tests being met. The site design could include a drainage strategy which would mitigate the risk from flooding. Potential mitigation includes the following:

- Set back development 8-metres from the existing river channel.
- Investigate naturalising the southern bank (i.e. removing the concrete wall).
- Follow guidance in the Council's River Corridor Improvement Plan SPD.
- Avoid locating caravans, car parking and hard-standing areas which could be used for storage purposes (i.e. builders rubble / machinery / plant etc.) in the western part of the site, which is at highest risk from flooding, and locate these elements of the development on higher ground or on areas which are considered at low risk.
- Incorporate SUDS (e.g. green roofs on permanent buildings) where possible.
- Include devices to control rates of discharge into the River to greenfield runoff rates (when not in flood) and consider providing attenuation ponds for surface water storage and amenity value.
- Ensure there is a safe and dry route to escape flooding.
- Prepare a Flood Evacuation Plan.

**IIA Objective 11 - To maintain and enhance landscapes and townscapes**

4.20 The allocation of the site for Gypsies and Travellers would result in the loss of open land, particularly the area to the north west of Pool Court. This could have a locally negative landscape effect. However, the site could be suitably designed to include native planting to mitigate the landscape impact, ensuring a very minor effect on this IIA objective.

**IIA Objective 12 - To conserve and where appropriate enhance the historic environment**

4.21 The closest designated heritage asset, a Grade II listed telephone kiosk, is located approximately 320m to the east of the site. The allocation of the site will have no impact on this heritage asset, due to its remote location from Land at Pool Court. The site is screened from the telephone kiosk by the existing built form. There would be a very limited impact on the Culverley Green Conservation Area as the site is wholly screened from the Conservation Area by vegetation and built form. The site is located adjacent to an area identified as having known archaeological potential. It is therefore anticipated that a desk based archaeological assessment would be required in support of any planning application. The preferred site would have a neutral effect on the historic environment and therefore the site is considered to have a negligible effect on this IIA objective.

**IIA Objective 13 - To minimise the production of waste and increase waste recovery and recycling**

4.22 The effect on this IIA objective is uncertain as it depends on policy implementation and the provision of waste and recycling facilities for residents.

**IIA Objective 14 - To reduce land contamination and safeguard soil quality and quantity**

- 4.23 The Land at Pool Court site would have a neutral effect on this IIA objective. Much of the site is brownfield land. However, the extant use as a scaffolding yard is unlikely to have resulted in contamination. The reuse of the brownfield site will have no effect on soil quality and quantity.

**IIA Objective 15 - To encourage sustained economic growth**

- 4.24 The site would introduce new residents to the locality who would contribute to the vitality and viability of Catford Town Centre, as they would be likely to purchase local goods and services. Residents of the site of working age would make a positive contribution to the local labour market. It is therefore considered that there is positive effect on this IIA objective.

**IIA Objective 16 - To promote access to employment, education, skills and training**

- 4.25 The site is located close to both educational facilities and employment sites. Rushey Green Primary School is the closest school, located approximately 900m to the north east of the site. The access to sustainable modes of transport also promotes access to both employment and education in the wider area. There is a positive effect on this IIA objective.



## 5.0 Mitigation and Monitoring

### MITIGATION

- 5.1 The site-specific development guidelines set out within the Lewisham Gypsy and Traveller Site(s) Local Plan provide appropriate mitigation measures associated with the implementation of the document. Further requirements for mitigation may be identified through the monitoring process. Mitigation measures should follow the hierarchy set out in Table 5.1.

Table 5.1: Mitigation hierarchy

Mitigation approach	Comment
Avoidance or prevention	This involves modifying alternative options and policies for the Local Plan
Reduction	Mitigation could focus on timing or phasing to reduce adverse effects.
Offsetting or compensation	This approach is used where opportunities are not available to either avoid or reduce adverse effects.
Remediation	Remediation is used where an adverse effect is unavoidable but the long-term effects can be reduced by restoring the affected area to its original state.
Enhancement	Although not strictly a measure to mitigate an adverse effect, enhancement is an opportunity to improve social, environmental and economic conditions. Enhancement could be used successfully to improve conditions.
Further information	Although the overall effects of the Gypsy and Traveller Site(s) Local Plan have been assessed through the IIA there may be a degree of uncertainty as to the anticipated effects of specific measures on the ground. In such circumstances mitigation could include specification of the need to conduct further assessments.

### MONITORING

- 5.2 The indicators relating to each sustainability objective are set out in Table 3.3. Appendix C sets out the targets, monitoring frequency, data sources and actions relating to each indicator. Monitoring will be completed by the London Borough of Lewisham and presented within the Annual Monitoring Report.

Appendices

**Appendix A**  
**Plans, Policies and Programmes**

Plans, Policies and Programmes	Relevant objectives	Implications for the Gypsy and Traveller Sites Local Plan and IIA
<b>International – All info apart from the National Section is taken from the 2005 Scoping Report</b>		
<b>The Johannesburg Declaration on Sustainable Development 2002</b>	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	The definition of sustainable development 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'.
<b>The Kyoto Agreement 1997</b>	The key aim is to limit and/or reduce the emissions of greenhouse gases.	Reducing greenhouse gas emissions.
<b>Convention concerning the Protection of the World Cultural and Natural Heritage 1972 (UNESCO)</b>	Article 5 – To ensure that effective and active measures are taken for the protection, conservation and presentation of cultural and natural heritage and to adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes.	The protection of Lewisham's cultural and natural heritage.
<b>Agenda 21 Declaration Rio de Janeiro 1992</b>	Committed countries to the principles of sustainable development. The Convention came into force on 29 December 1993. It has three main objectives: <ul style="list-style-type: none"> <li>• Conserve biological diversity;</li> <li>• Sustainable use of biological diversity;</li> <li>• Fair and equitable sharing of the benefits of biological diversity.</li> </ul>	The integration and balancing of economic, environmental and social objectives. Ensure the protection and enhancement of the area's biodiversity.
<b>Convention on Biological Diversity, Rio de Janeiro 1992</b>	The Convention outlines three main goals for the conservation, protection and enhancement of biological diversity; the conservation of biological diversity, its sustainable use, and the equitable sharing of benefits associated with genetic resources. National strategies and action plans must be implemented by Contracting Parties to achieve these goals.	Minimise impacts on biodiversity. View ecosystems holistically, rather than focussing on islands of protected species.
<b>European</b>		
<b>SEA Directive 2001/42/EC</b>	Requires an assessment of the effects of certain plans and programmes on the environment and prescribes the environmental issues to assess.	Ensure key environmental issues are assessed and considered.

<p><b>European Sustainable Development Strategy 2001</b> (Reviewed in 2009)</p>	<p>Environmental objectives and priorities derived from the EU Sixth Environmental Action Programme focus on:</p> <ul style="list-style-type: none"> <li>• limiting climate change and increasing the use of clean energy;</li> <li>• addressing threats to public health (e.g. hazardous chemicals, food safety);</li> <li>• combating poverty and exclusion;</li> <li>• dealing with the economic and social implications of an ageing society;</li> <li>• managing natural resources more responsibly (including biodiversity and waste generation);</li> <li>• improving the transport system and land use management.</li> </ul>	<p>The integration and balancing of economic, environmental and social objectives.</p>
<p><b>European Spatial Declaration on Sustainable Development, EU 1999</b></p>	<p>The aim is to work towards a balanced and sustainable development of the territory of the European Union.</p>	<p>The integration and balancing of economic, environmental and social objectives.</p>
<p><b>European Spatial Development Perspective 1999</b></p>	<p>ESDP aims to ensure that the three fundamental goals of European policy are achieved equally in all the regions of EU:</p> <ul style="list-style-type: none"> <li>• economic and social cohesion;</li> <li>• conservation and management of natural resources and the cultural heritage;</li> <li>• more balanced competitiveness of the European territory.</li> </ul>	<p>Economic and social cohesion, protecting and enhancing historic and cultural heritage, and reducing greenhouse gas emissions.</p>
<p><b>European Directive 92/43/EEC (&amp; 97/62/EC) on the conservation of natural habitats and of wild fauna and flora</b></p>	<p>Promote the maintenance of biodiversity by requiring member states to introduce robust protection measures to maintain or restore natural habitats and wild species.</p>	<p>Minimise the impact on natural habitats.</p>
<p><b>European Directive on Conservation of Wild Birds 2009 (2009/147/EC)</b></p>	<p>The maintenance of the favourable conservation status of all wild bird species across their distributional range.</p>	<p>Preserve habitats for birds.</p>

<b>European Directive 2002/49/EC (Noise)</b>	The Environmental Noise Directive aims to “define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to the exposure to environmental noise”. It aims at providing a basis for developing EU measures to reduce noise emitted by major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.	Mitigation of adverse impacts on health and well-being from temporary and permanent noise nuisance.
<b>European Directive on Ambient Air Quality Assessment and Management (96/62/EC) and daughter directives</b>	The Directives aim to reduce specified air pollutants. Limits have been translated into UK law in Air Quality Regulations.	Monitor progress in relation to air quality.
<b>European Directive 2000/60/EC (Water Framework Directive)</b>	To establish a framework to address pollution of waterways from urban wastewater and agriculture and to improve Europe’s waterways. Target: Member States to produce River Basin Management Plans by 2009 and to achieve the environmental objectives of the Plans by 2016.	Protection of ground and surface water from incidental, as well as accidental pollution.
<b>EU Community Biodiversity Strategy 2012-2020</b>	Seeks the conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).	Protection and enhancement of biodiversity.
<b>EU Landfill Directive (99/31/EC)</b>	To prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, ground water, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the land-filling of waste, during the whole life-cycle of the landfill.	Minimise waste generation and maximise sustainable waste management.
<b>European Waste Framework Directive (2008/98/EC)</b>	The Directive seeks to reduce the quantity of waste going to landfill and introduces the waste hierarchy of prevention, reuse, recycle, recovery, and disposal.	Reduce the amount of waste requiring final disposal. Monitor the proportion of waste reduced/recycled/recovered.
<b>Directive 2003/87/EC (establishing a scheme for greenhouse gas emission allowance trading)</b>	Introduces a European wide emissions trading scheme.	Reduce greenhouse gas emissions and overall carbon footprint. Reflect carbon reduction targets.

<b>EU Seventh Environmental Action Plan 2013 - 2020</b>	Seeks a high level of protection of the environment and human health and for general improvements in the environment and quality of life.	Protect and enhance overall environmental quality.
<b>National</b>		
<b>National Planning Policy Framework 2012</b>	The National Planning Policy Framework includes a presumption in favour of sustainable development and sets out the social, economic and environmental roles of the planning system.	A presumption in favour of sustainable development, considering the social, economic and environmental roles of the planning system.
<b>National Policy on Planning for Traveller Sites (2015)</b>	Sets out the Government's planning policy for traveller sites. The government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of live of travellers while respecting the interests of the settled community.	<p>The Government's aims in respect of traveller sites are:</p> <ul style="list-style-type: none"> <li>a) that local planning authorities should make their own assessment of need for the purposes of planning.</li> <li>b) To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.</li> <li>c) To encourage local planning authorities to plan for sites over a reasonable timescale.</li> <li>d) That plan-making and decision-taking should protect Green Belt from inappropriate development.</li> <li>e) To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites.</li> <li>f) That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.</li> <li>g) For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.</li> </ul>

		<ul style="list-style-type: none"> <li>h) To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.</li> <li>i) To reduce tensions between settled and traveller communities in plan-making and planning decisions.</li> <li>j) To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.</li> <li>k) For local planning authorities to have due regard to the protection of local amenity and local environment.</li> </ul>
<b>Environmental Assessment of Plans &amp; Programmes Regulations 2004</b>	Transposes the SEA directive into UK law.	Reflect the regulations and associated guidance note.
<b>The Housing and Planning Act 2016</b>	The Act sets out provision regarding housing, estate agents, rent charges, planning and compulsory purchase.	Comply with legislation.
<b>The Housing White Paper 2017</b>	This document sets out a broad range of reforms that government plans to introduce to help reform the housing market and increase the supply of new homes.	Comply with legislation.
<b>Planning and Compulsory Purchase Act 2004</b>	The Act provides the statutory planning framework for England.	Comply with legislation.
<b>Town and Country Planning Act 1990</b>	Sets out the procedures for the preparation, approval and adoption of Local Plans.	Comply with legislation.
<b>Housing Act 2004</b>	Requires Local Planning Authorities to complete an accommodation assessment and consider how to meet Gypsy and Traveller accommodation needs as part of their housing and planning requirements.	Comply with legislation.
<b>Planning and Energy Act 2008</b>	An Act to enable Local Planning Authorities to set requirements for energy use and energy efficiency in Local Plans.	Energy efficiency to reduce greenhouse gas emissions.



<b>Climate Change Act 2008</b>	The Act creates a new approach to managing and responding to climate change in the UK.	Consideration of impacts on Climate Change.
<b>Noise Policy Statement for England 2010</b>	<p>The Noise Policy Statement for England aims to provide the necessary clarity and direction to enable decisions to be made regarding what is an acceptable noise burden to place on society.</p> <p>To avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; and where possible, contribute to their improvement.</p>	<p>Avoid noise impacts.</p> <p>Mitigation of adverse impacts on health and well-being from noise.</p>
<b>UK Air Quality Strategy 'Working together for clean air' (2007)</b>	Everyone can enjoy a level of ambient air quality in public places which poses no significant risk to health or quality of life.	<p>Improve Air Quality.</p> <p>Encourage reduction or mitigation of air polluting land uses.</p>
<b>Energy White Paper 2003: Our energy, our future, creating a low carbon economy</b>	<p>The Strategy seeks to:</p> <ul style="list-style-type: none"> <li>• Reduce waste by making products with fewer natural resources;</li> <li>• Break the link between economic growth and waste growth;</li> <li>• Most products should be used or their materials recycled;</li> <li>• Recover energy from other wastes.</li> </ul>	Waste hierarchy – reduce, reuse, recycle.
<b>Environment Agency, Creating a better place strategy 2010-2015</b>	The strategy shows how the EA will work in specific areas to achieve its aims relating to biodiversity, climate change, flood risk, creating sustainable places and waste management.	Biodiversity, climate change, flood risk, and waste management.
<b>Thames Catchment Flood Management Plan</b>	Provides an overview of flood risk in the Thames catchment and sets out the EAs preferred plan for sustainable flood risk management over the next 50 to 100 years.	Manage flood risk.
<b>TE2100 Plan November 2012</b>	Provides an overview of flood risk in the Thames catchment and sets out the EAs preferred plan for sustainable flood risk management over the next 50 to 100 years.	Manage flood risk.

<b>Thames River Basin Management Plan 2009</b>	Pressures facing the water environment in this river basin district, and the actions that will address them.	Protection of water quality.
<b>Climate Change and the Historic Environment (English Heritage, 2007)</b>	Provides an overview of climate change impacts on the historic environment and of the impacts associated with responses to climate change.	Impacts on heritage assets and the wider historic environment.
<b>Building in Context (English Heritage, CABE 2007)</b>	Provides case-study examples of how new development can respond well to historic character in terms of design.	Impacts on heritage assets and the wider historic environment.
<b>Seeing History in the View (English Heritage 2010, revised in 2012)</b>	Explains how the heritage significance of views can be assessed in a systematic and consistent way however these views have come into being.	Impacts on heritage assets and the wider historic environment.
<b>Streets for All (English Heritage, 2006)</b>	Shows how public realm upgrades can be designed to be appropriate to and enhance the historic environment.	Impacts on heritage assets and the wider historic environment.
<b>Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (Historic England, 2013)</b>	Guidance focuses on SEA/SA for development plans. Committed to the principles of sustainable development.	Impacts on heritage assets and the wider historic environment.
<b>National Flood Emergency Framework for England (Defra, 2011)</b>	Provides a framework to follow in a flooding emergency.	Design of Gypsy and Traveller sites.
<b>Gypsy and Traveller Accommodation Needs and Assessment: Guidance 2007</b>	Guidance which aims to provide advice on carrying out an assessment of accommodation needs of Gypsies and Travellers.	Needs of Gypsies and Travellers.
<b>Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers 2008</b>	Guidance towards all aspects associated with Gypsy/Traveller developments.	Responsibilities associated with Gypsies and Travellers.
<b>Drfat guidance to housing authorities on the periodical review of housing needs – Caravans and Houseboats (March 2016)</b>	Draft guidance which aims to provide advice on carrying out an assessment of accommodation needs for caravans and houseboats.	Needs of Gypsies and Travellers
<b>National Flood and Coast Erosion Management Strategy (July 2011)</b>	Objective <ul style="list-style-type: none"> <li>• ensure a clear understanding of the risks of flooding and coastal erosion</li> <li>• set out clear and consistent plans for risk management</li> <li>• manage flood and coastal erosion risks in an appropriate way</li> </ul>	Impacts on Environment.

	<ul style="list-style-type: none"> <li>ensure that emergency plans and responses to flood incidents are effective</li> <li>help communities to recover more quickly and effectively after incidents.</li> </ul> <p>Aim</p> <ul style="list-style-type: none"> <li>put in place long-term plans to manage risks ensuring other plans take account of them</li> <li>avoiding inappropriate development in areas of flood and coastal erosion risk</li> </ul>	
<b>Civil Contingencies Act 2004 (CCA)</b>	<p>This legislation aims to provide a single framework for civil protection.</p> <p>The Act, and accompanying non-legislative measures, delivers a single framework for civil protection in the country. The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office's initiative to develop wider community resilience to threats and hazards.</p>	Impacts on Environment.
<b>Localism Act</b>	<p>Planning and regeneration provisions will provide for neighbourhood development orders to allow communities to approve development without requiring normal planning consent. Local authorities, the Environment Agency and other prescribed bodies are obliged to work together on certain strategic matters under the 'duty to cooperate' in the Localism Act in England. In particular, these organisations should cooperate across boundaries because flood risk often requires wider than local consideration.</p>	Impacts on Environment.

	<p>The Localism Act also requires lead local flood authorities (LLFAs) to make arrangements for overview and scrutiny committees to review and scrutinise risk management authorities. Risk management authorities are now under a duty to comply with a request made by an overview and scrutiny committee for information or a response to a report in relation to its flood or coastal erosion risk management functions.</p>	
<p><b>Growth and Infrastructure Act 2013 (April 2013)</b></p>	<p>The Act:</p> <p>Allows the modification or discharge of the affordable housing elements of section 106 planning gain agreements in order to make developments more viable.</p> <p>Contains the controversial measures to extend permitted development rights to allow single-storey extensions of up to eight metres.</p> <p>Introduces measures to allow developers to take planning applications to the Planning Inspectorate where a council has "consistently failed to meet statutory requirements to consider applications on time".</p>	<p>Impacts on Environment.</p>
<p><b>River Basin Management Plan 2015</b></p>	<p>This provides an important baseline not only for the status of the river water bodies mentioned in the IIA but also the groundwater bodies that were not mentioned in the IIA.</p>	<p>Impacts on Environment.</p>
<p><b>National Waste Plan and Waste Prevention Programme</b></p>	<p>This plan provides an analysis on waste management in England, bringing current and planned waste management policies together in one place.</p>	<p>Impacts on Environment.</p>

<b>The Water White Paper – Water for Life</b>	The Water White Paper focuses on the challenges facing the water sector, including maintaining water supplies, keeping bills affordable and reducing regulation. It recognises the need to protect rivers, streams and lakes from pollution and unsustainable abstraction, and acknowledges the critical importance of water supply and sewerage infrastructure.	Impacts on Environment.
<b>Groundwater Protection: Principles and Practice (GP3)</b>	The GP3 document is a key Environment Agency reference for LPAs, developers and land owners. It is an important accompaniment to the River Basin Management Plan as it explains the relevance of Source Protection Zones and how these contribute to achieving good status under the Water Framework Directive.	Impacts on Environment.
<b>Catchment Abstraction Management Strategies, (CAMS) EA</b>	CAMS provide current water availability for abstraction on a catchment by catchment basis, ensuring we safeguard water resources despite increasing pressures on water availability due to population growth and climate change.	Impacts on Environment.
<b>Equalities Act 2010</b>	Includes the requirement to protect the rights of individuals and to advance equality of opportunity for all.	Impacts on Equalities.
<b>Equality and Human Rights Commission (EHRC) 2016, Is England Fairer? England's most disadvantaged groups: Gypsies, Travellers and Roma</b>	This report summarises the findings on the the experiences of Gypsies, Travellers and Roma in relation to education, work and standard of living, health, prisons and stigmatising treatment. It promotes and enforces the laws that protect our rights to fairness, dignity and respect and is intended for use by policy makers.	Impacts on Gypsy and Travellers equalities.
<b>EHRC 2016, Race report: Healing a divided Britain</b>	Review into race inequality in Britain, providing comprehensive analysis and evidence on whether our society lives up to its promise to be fair to all its citizens.	Impacts on race inequalities.

<b>Traveller Movement, 2016, Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health</b>	Presents findings of health of the most vulnerable members of society.	Impacts on health.
<b>London</b>		
<b>The London Plan (March 2016)</b>	Strategic policies for spatial planning and development across London to ensure the city develops in a sustainable manner.	General conformity with the London Plan.
<b>London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008)</b>	Responds to the requirement placed on Local Authorities under the Housing Act 2004	Comply with legislation
<b>The Mayor's Air Quality Strategy 2010 and Progress Report July 2015</b>	Concentrates on policies to promote healthy living and sets out measures to tackle London's air quality problem.	Improve air quality.
<b>The Mayor's Economic Development Strategy 2010</b>	Sets out to encourage the expansion of opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life.	Encourage sustainable economic growth.
<b>The City of London's Biodiversity Action Plan 2010-2015</b>	Sets policies and proposals to protect and care for London's biodiversity by encouraging the greening of the built environment and the use of open spaces in ecologically sensitive ways.	Protect and enhance biodiversity.
<b>The Mayor's Cultural Strategy 2014</b>	Sets out the Mayor's proposals for developing and promoting cultural life in London.	Ensure the enhancement of cultural and social growth.
<b>London Climate Change Adaptation Strategy 2008</b>	Presents adaptation measures to address climate change within London.	Reducing the impacts and adapting to the effects of climate change.
<b>The Mayors Climate Change and Adaptation Strategy 2011</b>	Sets out a framework for enhancing quality of life in London and protecting the environment.	Reduce the impact and adapt to the effects of climate change.
<b>The Mayor's Transport Strategy 2010</b>	Details priority areas for transport that directly or indirectly benefit the environment and the London community.	Reduce the need for car travel and encourage sustainable modes of transport.
<b>Mayor of London's Municipal Waste Management Strategy 2011</b>	Reduce London's waste generation by 2020 and sustainably manage the waste created.	Reduce waste generation.
<b>Mayor's Ambient Noise Strategy 2004</b>	Minimise the adverse impacts of noise on people living, working and visiting London, using the best available practises and technology.	Mitigation or avoidance of noise impacts.

<b>The Mayor's Housing Strategy 2014</b>	Raise aspirations and promote opportunity: by producing affordable homes, particularly for families, and by increasing opportunities for home ownership; Improve homes and transform neighbourhoods: by improving design quality, by greening homes, by promoting successful, strong and mixed communities and by tackling empty homes.	Quality and affordability of housing supply.
<b>London Tree and Woodland Framework</b>	Plant the right trees in the right places to enhance the environment and quality of life.	Protect and enhance trees.
<b>Revised London View Management Framework SPG 2012</b>	New development needs to comply with appropriate viewing corridors that are located both within and across the borough.	Maintain and enhance the quality of the townscape.
<b>The London Rivers Action Plan</b>	Restoration of rivers and implementation of London Plan Blue Ribbon policies.	River restoration, access to rivers, acknowledgement of the positive role rivers and river restoration play in biodiversity, climate change and flood risk management.
<b>Mayor's Best Practice Guidance on Health Issues in Planning (2007)</b>	BPG promotes the Mayor's statutory duty to promote the health of Londoners. The guide helps boroughs tackle health inequalities and promote healthy developments. Helps Local Authorities to meet their obligations to promote wellbeing in their boroughs.	Appraise health and seek to reduce health inequalities.
<b>Mayor's Supplementary Guidance Sustainable Design and Construction 2014</b>	The SPG seeks to ensure future developments meet the highest standards of sustainable design and construction.	The sustainable use of natural resources and reduced impact of climate change through energy efficient design and construction.
<b>Mayor's Supplementary Guidance Accessible London: Achieving an inclusive environment 2014</b>	The SPG seeks to ensure the promotion of an inclusive accessible environment	Accessibility for all and inclusivity.
<b>Mayor's Supplementary Guidance Providing for Children and Young People's Play and Informal Recreation 2012</b>	The SPG seeks to ensure the provision for children of free and accessible spaces offering high quality play opportunities.	Accessible open space and access for all.

<p><b>Shaping Neighbourhoods: Character and Context 2014</b></p>	<p>The Mayor has published for public consultation draft Supplementary Planning Guidance on 'Shaping Neighbourhoods: Character and Context' to help with the implementation of policies in Chapter 7 of the 2011 London Plan, particularly Policies 7.4 on Local Character and 7.1 on Building London's Neighbourhoods and Communities.</p>	<p>Understand character and local context to identify how a place should develop.</p>
<p><b>London Planning Statement 2014</b></p>	<p>The Mayor has published for public consultation a draft 'London Planning Statement' as proposed London Plan Supplementary Planning Guidance. This is intended to fill the gap left by the Government's revocation of the former Government Office for London Circular 1/2008 by pulling together information about the Mayor's role in the London Planning system.</p>	<p>Propriety (in compliance with legal requirements regarding procedural fairness and propriety, and ensuring that decisions are properly based on relevant planning considerations); Promoting Sustainable Growth; and Viability (of development).</p>
<p><b>Housing in London March 2017</b></p>	<p>Housing in London is the evidence base for the Mayor's London Housing Strategy, summarising key patterns and trends across a wide range of topics relevant to housing in the capital. The Mayor formally adopted his London Housing Strategy in February 2010 and in December 2011 he consulted on proposals for a new Strategy.</p>	<p>Demographic pressures, housing affordability, the housing market, mobility and housing need, housing supply, decent housing, energy efficiency and fuel poverty.</p>
<p><b>All London Green Grid 2012</b></p>	<p>The All London Green Grid takes the principles of the East London Green Grid and applies them across London.</p>	<p>Integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways.</p>
<p><b>London's Foundations 2012</b></p>	<p>Sets out London's geological heritage, explaining the process for identifying sites of geological importance and important geological sites for protection.</p>	<p>Impacts on heritage assets and the wider historic environment.</p>
<p><b>London Housing Supplementary Planning Guidance (March 2016)</b></p>	<p>This Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan (MALP). It replaces the 2012 Housing SPG.</p>	<p>Demographic pressures, housing affordability, the housing market, housing need, housing supply, viability, social infrastructure and housing quality.</p>



<b>Homes for Londoners - Affordable Housing and Viability Supplementary Planning Guidance (August 2017)</b>	This SPG focuses on affordable housing and viability. It includes four distinct parts: background and approach; the threshold approach to viability assessments; detailed guidance on viability assessments; and a specific approach to Build to Rent schemes.	Meet identified affordable housing need.
<b>London Land for Industry and Transport Supplementary Planning Guidance (2012)</b>	This Supplementary Planning Guidance provides guidance on the implementation of policies relating to land for industrial type activities and transport in the Mayor's London Plan published in July 2011.	Achieving accessibility for all.
<b>London Social Infrastructure Supplementary Planning Guidance (2015)</b>	This document contains guidance to support London Plan Policy 3.16 on the Protection and Enhancement of Social Infrastructure, as well as policies 3.17 Health and Social Care Facilities, 3.18 Education Facilities and 3.19 Sports Facilities. It particularly focuses on those elements of social infrastructure that face the biggest strategic challenges - specifically health, education, sport, faith and burials.	Impacts on social infrastructure and health.
<b>Lewisham</b>		
<b>Lewisham Gypsy and Traveller Accommodation Needs Assessment (2015) as updated August 2016</b>	The assessment identifies the need for the borough to accommodate 6 or more pitches for gypsies and travellers.	Meet identified housing need.
<b>Lewisham Sustainable Community Strategy (SCS) 2008 -2028</b>	The SCS sets out the vision for the borough up until 2020 and includes objectives to improve social, environmental and economic outcomes for the borough.	Improve social, environmental and economic outcomes for the borough.
<b>Lewisham Core Strategy 2011</b>	The Core Strategy provides the spatial planning framework for the borough and is underpinned by five strategic objectives: <ul style="list-style-type: none"> <li>• Regeneration and growth areas;</li> <li>• Providing new homes;</li> <li>• Growing the local economy;</li> <li>• Environmental management;</li> <li>• Building a sustainable community.</li> </ul>	Avoid, and secondarily minimise and compensate for, any significant negative effects on the community, in social and economic terms, or the environment.

<b>Community Safety Strategy 2012-2017 (SCS), Safer Lewisham Plan 2013-14</b>	Sets out the results of the Strategic Assessment which identifies the key crime and disorder issues that face the borough, and the multi-agency actions that will be deployed to address them.	Reduce crime and the fear of crime.
<b>Corporate Plan 2008-2011</b>	The purpose of the Corporate Plan is to: <ul style="list-style-type: none"> <li>• set out the Council's vision, values, strategic direction and key priorities for action up to 2009 and beyond;</li> <li>• outline the Council's contribution to the delivery of the SCS.</li> </ul>	Improve social, environmental and economic outcomes for the borough.
<b>Lewisham Regeneration Strategy 2008-2020</b>	The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy complements the SCS.	Ensure the sustainable development of the borough.
<b>Lewisham Housing Strategy 2015 -2020</b>	Focuses on delivering the right housing mix to meet the housing needs and aspirations of all the borough's residents and achieving the wider goals expressed within the SCS.	Provide sufficient housing of appropriate quality, mix and tenure.
<b>Lewisham River Corridor Improvement Plan (2015)</b>	Provides guidance relating to rivers in Lewisham.	The Council seeks to secure high quality development along the river corridors.
<b>Lewisham Municipal Waste Strategy</b>	The Strategy aims to minimise Lewisham's annual growth in waste.	Minimise growth in waste.
<b>Lewisham Children and Young People's Plan 2012 - 2015</b>	The Plan focuses on implementing actions to improve a number of key outcomes for children and young people which will improve their lives and life chances.	Improve life outcomes for residents –promotion of education, employment, housing and leisure and community facilities.
<b>Lewisham Carbon Reduction and Climate Change Strategy 2008</b>	The Strategy is based on achieving a lasting and sustained decrease in emissions of CO2 working with strategic partners and with citizens to: <ul style="list-style-type: none"> <li>• reduce demand for energy;</li> <li>• increase energy efficiency;</li> <li>• increase the use of renewable energy;</li> <li>• tackle fuel poverty.</li> </ul>	Reduce the borough's carbon footprint.

<b>Social Inclusion Strategy 2005-13</b>	This strategy centres around five broad themes. It identifies the links between the council's existing strategies and services to enable more joined-up working.	Promote social inclusion, improve urban design, transport and education, and promote health and well-being in the borough.
<b>Healthier Communities – A health and well-being framework for Lewisham (Draft 2007 – 2010)</b>	The Strategy seeks to improve the health outcomes for Lewisham residents by adopting preventative measures and other innovative approaches.	Enhance the health levels in the borough.
<b>Lewisham Leisure and Open Space Study 2010</b>	This strategy aims to provide: <ul style="list-style-type: none"> <li>• A review of outdoor sport and recreation;</li> <li>• a borough playing pitch strategy;</li> <li>• an implementation plan and prioritised investment;</li> <li>• Plan for the Playing Pitch Strategy.</li> </ul>	Protect and maintain open spaces and biodiversity across the borough.
<b>Local Biodiversity Action Plan – A Natural Renaissance For Lewisham 2006 -2011</b>	The key objective is the protection and enhancement of areas suitable for wildlife in the borough and to increase citizens' access to nature, even in urban areas.	Primarily avoid, and secondarily minimise and compensate for, any significant negative effects upon biodiversity.
<b>Comprehensive Equalities Scheme 2016-2020</b>	Provides a set of equality objectives and a framework to assess and evaluate the equality impact of strategic planning.	Enables the Council to demonstrate its compliance with the Equality Act 2010
<b>Better futures: Lewisham's Homelessness Prevention Strategy 2009-2014</b>	The Strategy complements the objectives of the Lewisham Housing Strategy and seeks to prevent homelessness by providing long term and sustainable housing and promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment.	Ensure measures providing sufficient housing of appropriate quality, mix and tenure and improve access to, and opportunities for, childcare, health, education, training and employment are integrated.
<b>Lewisham Borough Sports Plan 2010-13</b>	The Strategy provides a vision for sport to increase opportunities to participate in sport at all levels and for all ages	Enhancing the health wellbeing levels in the borough.

<b>Lewisham Local Air Quality Action Plan 2008</b>	The key aim is to bring about change to reduce emissions (NO2 and PM10) from main source of pollution (road transport) in a cost-effective and proportionate way through Area Quality Management Areas (AQMA) with designated geographical boundaries.	Improve air quality. Promote land uses and activities with minimal impacts on air quality.
<b>Lewisham Strategic Flood Risk Assessment 2008</b>	The study identifies and provides advice to the Council on the suitability of development in areas at varying risks of flooding across the borough.	Minimise and mitigate the risk of flooding in the borough.
<b>Lewisham Strategic Flood Risk Assessment Update (2015)</b>	Updates previous study.	Updates previous study.
<b>Lewisham Flood Risk and Development Sequential Test 2009</b>	The sequential test identifies potential development sites and steers development to areas at lowest flood risk. Where there are no reasonable alternative sites in an area of lower flood risk, authorities must ensure that measures are incorporated that render the proposed development's vulnerability to flooding appropriate to the probability of flooding in the area.	Minimise and mitigate the risk of flooding in the borough.
<b>Lewisham Surface Water Management Plan (April 2011)</b>	This plan outlines the surface water flood risk in Lewisham and establishes a long term action plan for the management of surface water in the Borough.	Minimise and mitigate the risk of surface water flooding in the borough.
<b>Lewisham Local Implementation Plan (Transport) 2010 (LIP)</b>	The LIP is a statutory plan to implement the London Mayor's Transport Strategy.	Seek a reduction car travel and increase sustainable transport.
<b>Lewisham Local Implementation Plan 2011 to 2031</b>	The Local Implementation Plan (LIP) is the borough's transport plan, detailing its policies and programme for delivering the Mayor's Transport Strategy (MTS) within Lewisham.	Improving the existing transport network.
<b>Lewisham Employment Land Study 2015</b>	The ELS assesses the quantity, quality and viability of the borough's employment land to form an evidence base to support the review of policies and preparation of Lewisham Local Plan.	Informs the new Local Plan.

<b>Lewisham Infrastructure Delivery Plan – Framework Document 2015</b>	Lewisham’s Infrastructure Delivery Plan (IDP) was published in August 2010 as a ‘living document’ to be monitored and revised as necessary and supported the submission version of the Lewisham Core Strategy (October 2010).	Provides guidance on infrastructure delivery for the borough.
<b>Lewisham Local Plan Regulation 18 Document – Consultation on Main Issues</b>	This initial round of consultation notifies interested people about the Council’s intention to produce a new Lewisham Local Plan.	Updates previous Local Plan.
<b>Lewisham Strategic Housing Market Assessment 2008 and the South East London Sub-regional SHMA 2009</b>	The SHMA assesses housing provision and need within the borough and the five south east London boroughs. It outlines recommendations for the level of affordable housing and tenure mix, and identifies areas as well as specific groups within the borough and sub-region who may have different housing requirements.	Seek to facilitate housing provision, including its mix and tenure, and to ensure decent homes for all.
<b>Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA) 2009</b>	A joint collaboration between the Council and Lewisham Primary Care Trust (PCT). The JSNA identifies key themes for action aimed at improving long-term health and influence the long-term commissioning priorities of health infrastructure providers in the borough.	Seek to improve the health and well-being of the borough’s residents.
<b>Lewisham Conservation Area Management Plans</b>	Provides guidance for the management of the borough’s conservation areas.	Impacts on heritage assets and the wider historic environment.
<b>Lewisham Borough Wide Character Study 2010</b>	The character study provides a description of the physical form of the borough, its origins, places, streets and buildings to provide an understanding of the particular attributes of the London Borough of Lewisham.	Impacts on the character of the borough.
<b>Creative Lewisham – Lewisham Cultural and Urban Development Commission 2009 - 2013</b>	Vision of Lewisham as a visually exciting, creative and imaginative hub, with a synthesis between urban design, arts, culture and the economy.	Promote a vibrant and dynamic borough.
<b>Equality Analysis Revised Statement of Community Involvement (SCI) v.1 draft – 3 August 2016</b>	The document sets out the draft Equalities Analysis of the Revised Statement of Community Involvement (SCI).	Seeks to implement changes to the services budget.

<b>Hatcham Conservation Area Character Appraisal (2006)</b>	This character appraisal provides an assessment and definition of Hatcham's special historic and architectural interest	Seeks to ensure new development is in keeping and respects the conservation area.
<b>Culverley Green Conservation Area Character Appraisal (2001)</b>	This appraisal document provides an assessment and definition of Culverley Green's special historic and architectural interest.	Provides information on ensure new development is in keeping and respects the conservation area.

**Appendix B**  
**Baseline Information**

## 1. Climate

### ***Carbon emissions and energy consumption***

There is a consensus among experts that human activities are contributing to climate change through the release of greenhouse gases into the atmosphere. This has implications for the way we use and manage resources, particularly the future supply, availability and use of energy. The built environment, and the way people use their environment, contributes to greenhouse gas emissions and therefore sustainable development plays a critical role in tackling climate change. The full effects of climate change are unknown but climate risks which are expected to intensify in London over the coming decades include flooding, higher and unseasonal temperatures, urban heat island effect and limited water resources including drought, all impacting our quality of life.<sup>1</sup>

A significant contributor to climate change is the concentration of carbon dioxide (CO<sub>2</sub>) in the atmosphere. According to the Department for Energy and Climate Change (2011) the total CO<sub>2</sub> emissions for Lewisham between 2005 and 2009 are reducing annually and the per capita reduction rate is at 17.4% since 2005. This is shown on Table A1. The figure exceeds the target of 8.5% set by the Council. The total CO<sub>2</sub> emission in Lewisham is 998,000 tonnes and contributed 2.35% of London's total CO<sub>2</sub> emissions. The largest source of emissions is from the domestic sector followed by road transport. At just 3.8 tonnes per person, Lewisham has the lowest per capita carbon emissions in inner London, the second lowest in the capital as a whole (after Redbridge) and the fourth lowest in the UK. There has been a decrease in London's per capita emissions falling by 12.7% from 6.3 tonnes person to 5.5 tonnes.

Annual CO<sub>2</sub> emissions (tonnes) in Lewisham 2005 to 2009

Lewisham	Industry and commercial	Domestic	Road Transport	Total	Population ('000s, mid-year estimate)	Per capita emissions (t)	Per capita reduction since 2005 (%)
2005	315	581	282	1,180	254	4.6	17.4
2006	316	572	277	1,166	257	4.5	
2007	306	556	278	1,141	259	4.4	
2008	264	556	267	1,088	262	4.2	
2009	239	500	258	998	265	3.8	

Source: DECC, 2011

Annual CO<sub>2</sub> emissions (tonnes) in Greater London 2005 to 2009

Greater London	Industry and commercial	Domestic	Road transport	Total	Population ('000s, mid-year estimate)	Per capita emissions (t)	Per capita reduction since 2005 (%)
2005	20,389	17,291	9,239	46,966	7,485	6.3	12.7
2006	21,738	17,193	9,114	48,089	7,547	6.4	
2007	20,977	16,807	9,050	46,876	7,602	6.2	
2008	21,157	16,865	8,664	46,726	7,668	6.1	
2009	18,752	15,232	8,419	42,441	7,753	5.5	

Source: DECC, 2011

<sup>1</sup> Where temperatures in urban areas, particularly at night are warmer than non-urban areas



The GLA notes that by far the largest contributor to domestic emissions is space heating and cooling, which produce three times as many emissions as either water heating or appliances, and ten times as many as lighting.<sup>2</sup> It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO<sub>2</sub> identified in the London Climate Change Adaptation Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels.

The emissions for Lewisham reflect its small industrial and commercial base and predominantly residential character with older properties, and its limited Underground services. It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO<sub>2</sub> identified in the London Climate Change Adaptation Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels. The percentage of homes that do not meet decent homes standards in the borough is reducing; however there is still a need to improve this.

The Council is proactively working to address climate change issues. The borough was awarded Beacon Status in 2005/06 for work on sustainable energy and has a wide variety of programmes aimed at energy efficiency and reducing CO<sub>2</sub> emissions. To implement its goals the Council has a Corporate Sustainability Board and in July 2008 published a Carbon Reduction and Climate Change Strategy to ensure it leads by example on energy efficiency. The Council's ambition is for Lewisham to play a leading role in responding to climate change locally, regionally and nationally with the aim of achieving the lowest amount per capita CO<sub>2</sub> emissions in London. Any future residential development will need to meet Code for Sustainable Homes Level 4 or higher. Level 4 will provide greater energy efficiency (heating and cooling) as well as water efficiency features to improve biodiversity such as a green/living roof.

Section 3.4 of the London Borough of Lewisham Renewable Evidence Base Study<sup>3</sup> states the existing renewable energy capacity in Lewisham. A review of the Ofgem Renewables and CHP Register<sup>4</sup> showed that out of over 2000 facilities for renewable energy none of them are located in the London Borough of Lewisham. Although there are no major renewable energy facilities currently in the borough there may be some standalone renewable installations that provide renewable energy on a small scale.

## **2. Air**

There are five air quality management areas (AQMAs) in the borough, located where the level of pollutants is higher than the acceptable threshold. National Air Quality Objective (NAQO) for nitrogen dioxide (NO<sub>2</sub>) is set at 40µg/m<sup>3</sup> as an annual average. In urban areas, this is the most difficult target to meet. Road traffic is the main source of air pollution in the borough. Excessive road traffic, which affects areas of poor air quality, is considered to be one of the main modern 'environmental stress' factors.

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<sup>2</sup> Housing in London: The Evidence Base for the Mayor's Housing Strategy, September 2014

<sup>3</sup> London Borough of Lewisham Renewable Evidence Base Study 2010

<sup>4</sup> Ofgem, "Ofgem Renewables and CHP Register",

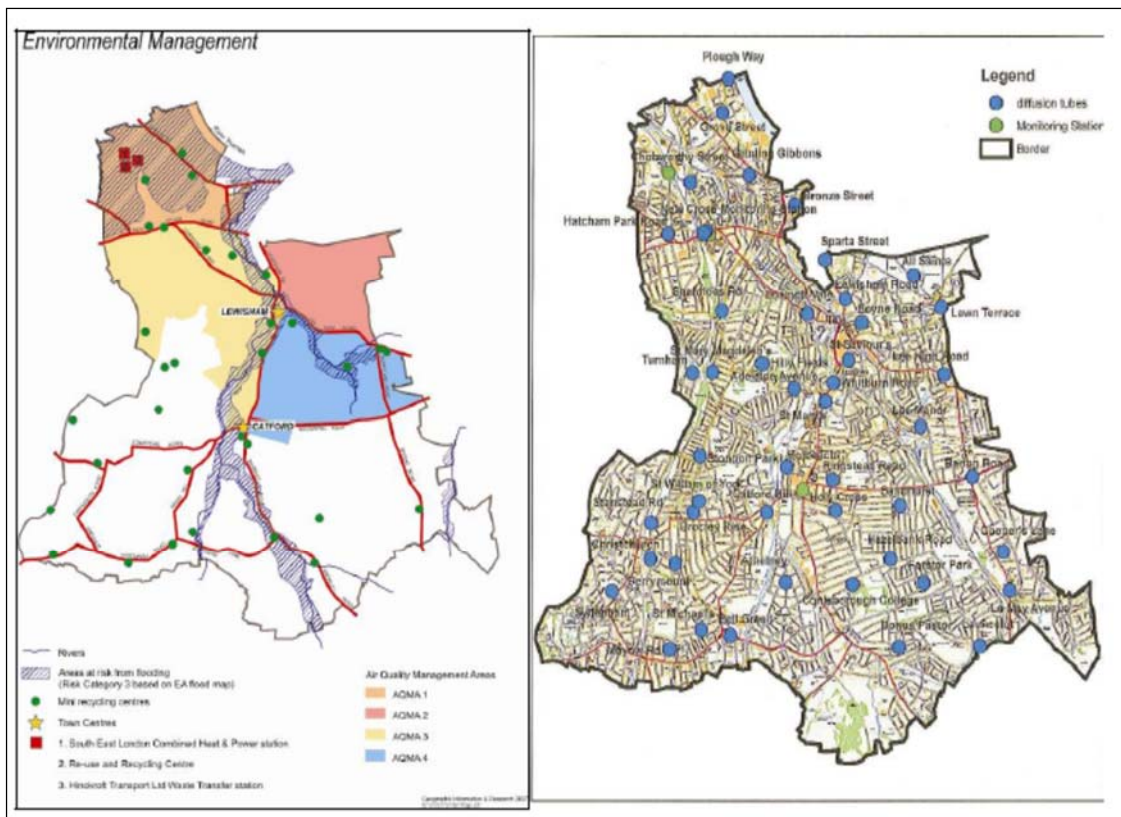
<http://www.ofgem.gov.uk/Sustainability/Environment/RCHPreg/Pages/RCHPreg.aspx>

Exposure to higher levels than  $40\mu\text{g}/\text{m}^3$  is most likely to affect those who have a pre-existing respiratory illness as it causes irritation of the nose, throat and airways. However, the objectives do not necessarily represent 'safe' levels and it is agreed that authorities should continue to work to improve air quality and not just aim to meet the targets.

The borough's air quality will remain an important issue that needs to be addressed. The Council adopted an Air Quality Action Plan in 2008. The focus of which is mainly concerned with reducing emissions from road transport, with an emphasis on balancing supply side measures, such as improved walking, cycling and public transport, and demand side management, such as traffic restraint and regulation. The implementation of the London Low Emission Zone is expected to have the highest benefit in improving air quality within Lewisham AQMAs.

The Council's fourth review and assessment (Updating and Screening Assessment) of air quality was conducted in June 2009. There is a risk of the annual mean objective being exceeded for nitrogen dioxide and for particles PM10. The Detailed Assessment concluded that the Council should maintain the designated AQMAs and continue the programme of monitoring which was expanded in 2010 to measure PM10 in a location where fugitive sources were believed to be an issue.<sup>5</sup>

#### Air Quality Management Areas in Lewisham and Monitoring Stations



<sup>5</sup> Air Quality Action Plan 2008

### **3. Biodiversity, flora and fauna**

Lewisham's natural heritage has helped shape the borough's development and continues to be a reason why people choose to live and work here. Names such as Lee Green, Grove Park and Forest Hill give an idea of the landscape from which Lewisham developed. Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields.

Lewisham has more than 560 hectares of green space (about 14% of the area of the borough), with 46 public parks covering about 370 hectares of land. Lewisham is one of the greenest parts of south-east London with over a fifth of the borough being parkland or open space.<sup>6</sup> Areas of parkland and open space play an important environmental role, contributing to biodiversity within the borough.

The Stag Beetle is the largest beetle in the UK, is threatened at the global level and has undergone significant decline in the past 40 years. Recent surveys indicate south London is a national hotspot and in Lewisham they can be found throughout the borough. They require suitable dead wood for their survival and management of this resource is a key priority for land managers.

Within the borough of Lewisham there are 60 sites designated as Sites of Nature Conservation Importance (SNCI) including 19 Local Nature Reserves (LNR). In addition, the council has 21 nature conservation areas directly under ecological management, each with its own unique features.<sup>7</sup> The River Thames and other waterways, private garden areas, and railway line-sides also provide valuable habitats for wildlife in the borough.<sup>8</sup>

### **4. Soil**

The solid geology of Lewisham is predominantly marine London Clay in the central and southern sections of the borough, with a pocket of Lambeth Group clay in the south and a number of pockets in the north. Towards the north of the borough there are also pockets of chalk (Upper Chalk and Chalk Group) and sand (Thanet Sand Formation). In the north east and south / south eastern sections of the borough there are also pockets of Harwich Formation sand and gravels.<sup>9</sup>

The drift deposits are concentrated in the north and central sections of the borough, with alluvium in the vicinity of the River Thames and along the River Ravensbourne valley. Gravels of the Kempton Park Gravel Formation can generally be found adjacent to the alluvial deposits. In addition, there is a pocket of Langley Silt

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<sup>6</sup> Lewisham Leisure and Open Space Study 2010

<sup>7</sup> Core Strategy 2011

<sup>8</sup> Core Strategy 2011

<sup>9</sup> London Borough of Lewisham, 2010: Contaminated Land Inspection Strategy, prepared by the Environmental Protection Group.

Formation deposits in the north west of the borough and pockets of Head (Clay) in the south of the borough.<sup>10</sup> The borough is characterised by slowly permeable soils which are seasonally wet and slightly acid but base rich loamy and clayey in texture. Along the river corridors, and specifically in the locality of Catford town centre, the soils are loamy with naturally high groundwater.<sup>11</sup>

There are currently no entries recorded in Lewisham's Contaminated Land Register.<sup>12</sup> This should not however, be interpreted that the land is necessarily free of contamination.

## **5. Water**

### ***Flood zones***

The London Borough of Lewisham has some land within flood zones 2 and 3. Flood zone 2 represents the 1 in 1000 year probability of flooding, and flood zone 3 represents the 1 in 100 year probability of flooding. The area of land within flood zones 2 and 3 is predominantly around in the North of the Borough, where the risk is tidal flooding from the Thames. Other areas include the land around the river Ravensbourne and river Pool, extending to the south of the Borough and the Quaggy, extending towards the east of the Borough. In Lewisham there are approximately 21,752 properties at risk of flooding from river and tidal sources. This equates to 16% of all properties in the Borough. For the properties at risk of flooding, 8% are classified as having a significant likelihood of flooding, compared to 83% which are classified as having a low likelihood of flooding. The remainder have a moderate likelihood of flooding. Potential risk of flooding from other (non river related) sources also exists including possible sewer surcharging and surface water flooding as a result of heavy rainfall and/or blocked gullies. With changing climate patterns, it is expected that intense storms will become increasingly common and those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years.<sup>13</sup>

### ***Water Framework Directives***

The Water Framework Directive is European legislation designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology. The Environment Agency is the lead authority on the WFD in England and Wales. We are required to plan and deliver actions that will improve our water environment. There are three watercourses in Lewisham designated under the WFD, The River Pool, Quaggy and Ravensbourne. Under the WFD, these need to achieve good ecological potential by 2027. A programme of measures to improve the status is being developed. This will include a series of measures to address urban diffuse pollution in some parts of London, in order to achieve the 'good' ecological status required for the Directive.

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<sup>10</sup> Contaminated Land Inspection Strategy, 2010.

<sup>11</sup> National Soil Resources Institute (NSRI) Soilscales website <http://www.cranfield.ac.uk/sas/nsri/>

<sup>12</sup> Lewisham Borough Council website: [www.lewisham.gov.uk](http://www.lewisham.gov.uk)

<sup>13</sup> SFRA 2008

### ***Water Quality: Chemical Water Quality***

The only watercourse in the Borough currently designated under the chemical General Quality Assessment (GQA) is the section of the River Ravensbourne between the River Pool and the Tideway. New chemical GQA calculations have been introduced under which biological oxygen demand has been removed as one of the parameters. This means the calculation is now based on ammonia and dissolved oxygen levels to grade each river reach. Using this method, the chemical quality has consistently been found to be very good, having achieved a grade A every year between 2000 and 2009. There has been a reduction in the size of the GQA network over the last few years. The River Quaggy and the River Pool were designated up until 2006. The quality of the River Quaggy was good, with the reach achieving a grade B on average. The quality of the River Pool was only fairly good, as it predominantly achieved a grade C.

The River Quaggy and River Ravensbourne merge in Lewisham town centre, and these rivers have quite similar catchments. Unusually there are no major point sources of pollution in these urban rivers, and water quality issues (principally related to nutrients) arise from diffuse urban sources such as road runoff and missed connections, where domestic sewerage is wrongly connected to pipes intended for surface water runoff. As a result, water quality is very variable, and can be good during periods of dry weather.

### ***Householder Water Use***

All of Lewisham falls in Thames Water's London resource zone, where average consumption in 2009-10 was 167 litres per person per day.<sup>14</sup> This compares to the five year average for the Borough of 160.4 litres consumed per person per day between 2005/06 and 2009/10. This water resource zone (WRZ) is seriously water stressed. The Government has set a target for households to achieve 130 litres per person per day, which will require changes to consumption patterns in order to meet it. Through the Code for Sustainable Homes, any future residential development in Lewisham will need to meet Code for Sustainable Homes Level 4. Level 4 will provide greater water efficiency features to encourage sustainable consumption of drinking water within buildings and external watering/irrigation.

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<sup>14</sup> Thames Water, 2010. Thames Water revised Water Resources Management Plan. [online] (Updated 2010) Available at: <http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/5392.htm>

## 6. Population, human health and equality

### *Population*

The population of the London Borough of Lewisham was 275,885 at the 2011 census. The population of Lewisham grew by 3% between 2001 and 2011. It is forecast to increase by almost a quarter (64,300) between 2006 and 2031.<sup>15</sup> Children and young people (0 to 19 years) make up over a quarter of the population, one of the highest proportions in London.<sup>16</sup> Elderly residents (over 75 years) make up just 5%. The average age of our population is 34.7 years and is young when compared with other London boroughs. Population growth and an increase in the number of households is expected to be concentrated within the Evelyn, New Cross and Lewisham Central wards. This is due in part to the major development and regeneration plans such as Convoys Wharf and within the Lewisham Town Centre. In terms of life expectancy for the borough's population, between 2005 and 2007 the average life expectancy at birth for men in Lewisham was 76 years, compared with 77.3 years in England; and over the same period the life expectancy for women was 80.8 years in Lewisham compared with 81.5 years in England.<sup>17</sup> The population was more or less evenly split between males and females and these proportions are not expected to change in the period to 2014.<sup>18</sup>

There was a growth in all groups of the black and minority ethnic (BME) population between the 2001 and the 2011 Census. This has risen from 39% of households to 58.5%, who largely live in the northern and central parts of the borough.<sup>19</sup> The general level of health of people in Lewisham is significantly poorer than the health of people in the rest of England. Some indicators of poor health are specifically related to low income such as coronary heart disease, cancer and respiratory disease. Reducing premature mortality from circulatory diseases and cancer remain priorities for Lewisham.<sup>20</sup>

The 2011 Census explored characteristics of the Gypsy and Traveller Community for the first time. It established that 58,000 people identify themselves as a Gypsy or Irish Traveller, this equates to 0.1% of the usual resident population of England and Wales. People identifying as Gypsy or Traveller included 39% of residents under 20, compared to 24% of the overall England and Wales population under 20. Gypsy or Traveller was the ethnic group with the lowest proportion of respondents who were economically active at 47%. The Census found that the ethnic group were more than twice as likely to live in social housing than the overall population of England and Wales. Gypsy and Travellers had the lowest proportion of any ethnic group rating their general health as 'good' or 'very good' at 70% compared to 81% of the overall population for England and Wales. According to the 2011 census there are 93 Gypsy and Travellers in bricks and mortar accommodation in Lewisham.

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<sup>15</sup> Greater London Authority 2008 Round of Demographic Projections, RLP High

<sup>16</sup> Census 2011

<sup>17</sup> JSNA, NHS London

<sup>18</sup> Male 49% and female 51%.

<sup>19</sup> BME population estimated at 49.4% of households as evidenced through the Lewisham Household Survey 2007 for the Strategic Housing Market Assessment (SHMA)

<sup>20</sup> Joint Strategic Needs Assessment (JSNA), NHS Lewisham

The Index of Deprivation 2015 ranked Lewisham as the 19<sup>th</sup> most deprived area in the UK that affects children and older people. It also states the population for Lewisham has increased since the census and is now 293,100<sup>21</sup>. Lewisham is within the 20% most deprived Local Authorities in the country. In 2010 Lewisham was ranked the 31<sup>st</sup> most deprived Local Authority. Although the recent ranking is lower than in the 2010 Index of Deprivation, a number of local authorities that were previously within the 20% most deprived nationally are no longer in existence. The Index of Deprivation looks at a range of indicators covering income, employment, health, education, training, skills, living conditions and access to services.

In the 2015 Index of Deprivation of Lewisham's 166 LSOAs 40% were in the 20% most deprived in England, compared with 38% in 2007. Only five of these LSOAs were within the worst 10% (this is the same as in the 2010 ID); they are dispersed across the wards of Bellingham, Evelyn, Lewisham Central, Rushey Green and Whitefoot. However, 58 of Lewisham's LSOAs were in the bottom 10-20% (up two from 2007); making a total of 63 LSOAs in the bottom 20%.

With nearly 40% of Lewisham's LSOAs in the bottom 20%, and almost all of the remaining LSOAs being in the bottom 50%, the ID results again suggest that Lewisham faces some significant challenges. Care must be taken not to assume that 'less deprived' means 'wealthier' as the indices measure only levels of deprivation, not affluence. In addition, it is important to recognise that even in LSOAs with little deprivation there may be individuals and families experiencing deprivation. These people will also need to access support and services aimed at tackling deprivation.

## **Health**

There are many healthcare facilities in Lewisham. There are a vast array of health services incorporating the needs of the population. The main health care services in Lewisham are community services as well as a university hospital and several mental health centres<sup>22</sup>.

The following list details these:

Southbrook Road Community Mental Health Centre – 1 Southbrook Road, Lee

Speedwell Mental Health Centre – Speedwell Street

Cygnets Lodge Lewisham – Lewisham Park

University Hospital Lewisham – High Street, SE13 6LH

Burgess Park – Unit 2, Burgess Park Industrial Estate, SE5 7TG

Downham Health and Leisure Centre – 7-9 Moorside Road, Downham, BR1 5EP

Primary Care Centre Hawstead Road - Primary Care Centre, Hawstead Road, Catford, SE6 4JH

Honor Oak Health Centre - 20 Turnham Road, Honor Oak Rd, SE4 2HH

Ivy House - Bradgate Road, Catford, SE6 4TT

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<sup>21</sup> London Datastore <http://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles.html/atlas.html>

<sup>22</sup> <https://www.lewishamandgreenwich.nhs.uk/contact-community-sites-in-lewisham/>

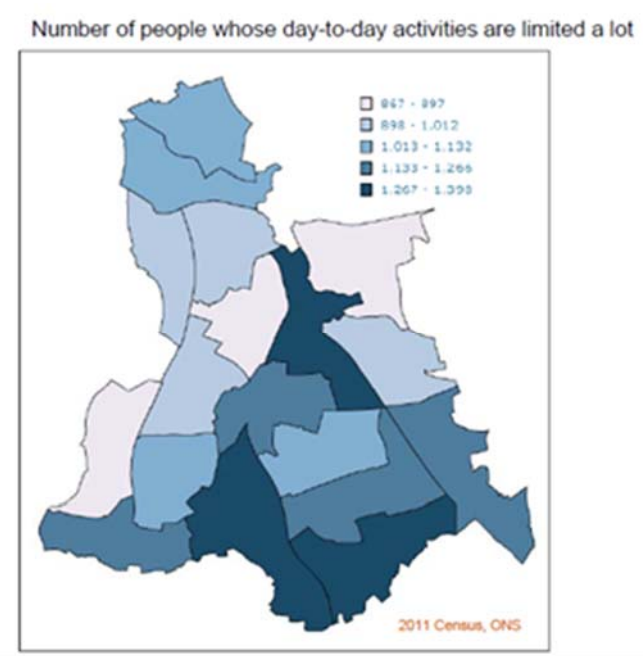
Kaleidoscope - 32 Rushey Green, Catford, SE6 4JF  
 Jenner Health Centre - 201-3 Stanstead Road, Forest Hill, SE23 1HU  
 Lee Health Centre - 2 Handen Road, Lee, SE12 8NP  
 Marvels Lane Health Centre - 37 Marvels Lane, Grove Park, SE12 9PN  
 South Lewisham Health Centre - 50 Conisborough Crescent, Bellingham, SE6 2SP  
 Sydenham Green Health Centre - 26 Holmshaw Close, Sydenham, SE26 4TH  
 Waldron Health Centre - Amersham Vale, New Cross, SE14 6LD

## Equality

The 2011 Census indicates 14.4% of the Lewisham population (39,735) had a limiting long-term illness. Of these, 7.3% of people (19,523) indicated their daily activities were limited a lot. Analysis by Public Health England for its learning disability profiles indicates that Lewisham has average numbers of learning disabled people (16-64) known to the Council (four per 1000).

Analysis of Lewisham's recent residents survey found that less than half of disabled residents (48%) were confident that their local community would be able to help if a service in their local area was under threat, compared to two-thirds of nondisabled residents (66%).

The figure below shows long term health problems or disabilities in Lewisham (Census 2011).



The census categories used for mapping are broad (essentially white/non-white) and mask high levels of local diversity as well as differing national and cultural origins. The largest combined ethnic group in the borough is categorised in the census as White; English/Welsh/Scottish/Northern Irish/British. There was a growth in all groups of the black and minority ethnic (BME) population between the 2001 and 2011 Census. This



has risen from 39% of households to 58.5%, who largely live in the northern and central parts of the borough.

Christianity is the most populous religion of Lewisham residents, particularly in the south of the borough. Between 2001 and 2011, the percentage of people citing Christianity as their religion declined by 8.4%, from 61.2% to 52.8%. Over a quarter of residents stated that they have no religion and this increases to a third of residents in Blackheath, Brockley, Crofton Park, Forest Hill and Telegraph Hill.<sup>23</sup>

## **7. Material assets**

### **Homes**

#### **Continuous growth in population and high demand for housing and affordability**

The population is forecast to rise. The Mayor of London requires 10,050 new residential units to be built in Lewisham by 2021. The average income of the majority of households is insufficient to buy a house. The SE London and Lewisham Strategic Housing Market Assessments highlight that access to affordable housing remains an issue throughout the borough. Based on the GLA Housing Price 2008 data, the housing price in Lewisham has increased steadily over the last five years. However, it is still lower than the London average price (£249,789 compared to £297,785).<sup>24</sup> This is particularly relevant given that the Lewisham Household Survey for the SHMA asked a question about household income. This included gross household income from all sources such as earnings, pensions, interest on savings, rent from property and state benefits. While just under a fifth of households have an income of over £40,000, however nearly half of all households have an income of less than £15,000.<sup>25</sup>

#### ***Existing dwelling stock***

Of the total dwelling stock, 54% of properties in Lewisham are flats of which nearly half are converted dwellings rather than purpose built. Of the remainder 34% are terraced houses and 12% are detached or semi-detached.<sup>26</sup> In terms of bedroom size, 27% of properties are 1 bedroom, 33% 2 bedroom and 30% 3 bedroom. This leaves 10% with 4 or more bedrooms.

A dramatic change has taken place in the tenure of property in the London borough of Lewisham in the past few years. This provides a roughly equal tenure split between private rent, social rent and private ownership. It is considered that the increase in the private rented sector is a result of the buy-to-let market in recent years. The amount of private rented properties has increased from 14.3% in 2001 to 24.3% in 2011. Conversely social rented properties have fallen from 35.6% in 2001 to 31.1% in 2011, while properties owned outright or with a mortgage have decreased from 50% in 2001 to 42.4% in 2011.<sup>27</sup>

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<sup>23</sup> Lewisham's Comprehensive Equalities Scheme 2016-2020

<sup>24</sup> Land Registry, March 2009

<sup>25</sup> 48%

<sup>26</sup> Lewisham Household Survey 2007, SHMA 2014

<sup>27</sup> Lewisham Household Survey 2007, SHMA 2014, 2011 Census

A total of 33,922 households were assessed as living in unsuitable housing due to one or more factors.<sup>28</sup> The largest reason was overcrowding (11,482 households), and major disrepair or unfitness (10,641); followed by support needs, accommodation too expensive and sharing facilities (6,151, 5,263, and 4,487 respectively). Deptford is one area in the borough most likely to contain unsuitably housed households which corresponds to areas identified with higher levels of deprivation.<sup>29</sup>

### ***Affordable Housing***

Lewisham's housing strategy, Homes for future<sup>30</sup>, states that the council aims to deliver 11,000 homes by 2020 of which up to 50% will be affordable housing with the aim to reduce homelessness and the number of households in temporary accommodation and also to enable people on low and modest incomes to afford their own home. The tenure mix of affordable housing is agreed on an individual basis, it takes into consideration the existing housing mix and character as well as the demand in the area for affordable housing.

## **8. Cultural heritage**

The complex historical development of the borough has left a legacy of distinctive neighbourhoods. In acknowledgement of this distinctive heritage a substantial portion of the borough is identified as an Archaeological Priority Area. An archaeological priority area is an area specified by Local Planning Authorities to help protect archaeological remains that might be affected by development. This means that any redevelopment in these areas that might reveal remains of interest will be required to undertake an assessment and preservation in accordance with advice from English Heritage.

Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. These open spaces have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets. For example, the open character of Blackheath is an integral element of the Blackheath Conservation Area and a supporting element to the outstanding universal value of the Maritime Greenwich World Heritage Site. The small area of open space within the Culverley Green Conservation Area provides a welcome element of informality to the grid pattern of tree lined streets.

Lewisham has around 27 conservation areas covering 707 ha of the borough, around 540 nationally-listed buildings, over 200 Locally Listed buildings, 2 Registered Parks and Gardens, 21 areas of Archaeological Priority and 1 Scheduled Ancient Monument. Lewisham's open spaces also have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets.

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<sup>28</sup> Lewisham Household Survey 2007, SHMA 2014, 2011 Census

<sup>29</sup> Lewisham Household Survey 2007, SHMA 2014, 2011 Census

<sup>30</sup> 'Homes for the future: raising aspirations, creating choice and meeting need' Lewisham's Housing Strategy 2009-2014

## 9. Landscape

The borough of Lewisham is primarily residential in nature, characterised by 20th century suburbs in the south to older Victorian neighbourhoods in the north. These extensive areas of housing are punctuated with a network of small and large town centres, local shopping parades, employment areas of varying quality and job density, many parks and green spaces, and railway corridors, and are overlaid by a range of heritage assets.

The borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. In fact, Lewisham has more than 560 hectares of green space (about 14% of the area of the borough), with 46 public parks covering about 370 hectares of land. These areas play an important environmental and recreational role as well as defining and continuing to contribute to Lewisham's overall character.

Lewisham is located within the London Basin Natural Area<sup>31</sup> and is defined by an urban / suburban land use according to the Dudley Stamp Land Use inventory.<sup>32</sup> The landscape character of the borough is focused around the Ravensbourne, Quaggy and Pool rivers which flow into Deptford Creek. Elevated views play a significant role in the character of the area. There is a general gradient of development across the borough from oldest in the north to more modern in the south. As London has grown, the borough has seen successive rounds of urbanisation moving south across the borough.<sup>33</sup>

Lewisham also has 37 allotment sites which are very popular with local residents. Because of the current interest in healthy, outdoor living and organic food, all of the sites have waiting lists. No areas within the borough are designated as Greenbelt land. Of the 37 allotment sites within the borough, one relatively small allotment can be found in the Rushey Green ward at the Weavers Estate (0.42 ha).

Compared to a city average of 41%, only 23% of land in the borough of Lewisham is green space or water. Despite having 560 ha of green space, parts of the borough are considered to be deficient in open space, and with increasing pressures to build, the borough aspires to protect all its green space.<sup>34</sup>

## 10. Waste

Lewisham is a unitary waste authority. Over 80% of Lewisham's waste is diverted away from landfill by incinerating it as the South East London Combined Heat and Power Station (SELCHP), which recovers power to supply to the National Grid. Of the borough's total waste for 2010/11 only 6% was sent to landfill. The borough incinerates 76% of its household waste. Lewisham has on the other hand the lowest recycling and composting rate in London in 2009/10. The overall household recycling and composting rate in Lewisham has steadily between 2000/01 and 2007/08.

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<sup>31</sup> English Nature, 1997: London Basin Natural Area Profile

<sup>32</sup> [www.magic.gov.uk](http://www.magic.gov.uk)

<sup>33</sup> Lewisham Borough Council, May 2011: Development Management Local Plan Sustainability Appraisal Scoping Report

<sup>34</sup> Lewisham Borough Council, May 2011: Development Management Local Plan Sustainability Appraisal Scoping Report

However, the rate has since declined. The current recycling and composting rate is almost 15% lower than the London total rate of 31.8%.<sup>35</sup>

The Council aims to increase household recycling / composting and in 2010/11 has set a target to recycle compost or reuse 25% of its household waste. Further, targets have been set to landfill 8% of municipal waste by 2010/11 and to reduce household waste per household to 716kg in 2010/11.<sup>36</sup> There is a projected waste growth of 3% per annum, which means that disposing of this increasing amount and variety of waste will become increasingly difficult. Every borough is allocated an apportionment of waste in the London Plan that they must dispose of using appropriate facilities. For Lewisham this equates to approximately 208,000 tonnes in 2010, increasing to 323,000 tonnes by 2020.<sup>37</sup> Provision in the borough exceeds this level with the South East London Combined Heat and Power Station (SELCHP) in Deptford capable of handling 488,000 tonnes alone. Further facilities in Lewisham are capable of dealing with over 200,000 tonnes and provide support to other boroughs in the south-east region of London.<sup>38</sup>

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<sup>35</sup> Department for Environment, Food and Rural Affairs (Defra), 2013. Municipal Waste Management Statistics. [online] (Updated 07/02/2013) Available at:

<http://www.defra.gov.uk/statistics/environment/>

<sup>36</sup> Lewisham Municipal Waste Strategy 2008

<sup>37</sup> London Plan policy 4A.25 and Table 4A.6

<sup>38</sup> Southeast London Boroughs' Joint Waste Apportionment Technical Paper, 2009 and 2014

## **Appendix C**

### **Sustainability Objectives, Indicators, Targets and Monitoring**

Sustainability Objective	Indicator	Target	Monitoring Year/Frequency	Data Source	Action
1. To provide sufficient housing and the opportunity to live in a decent home	<p>Number of housing completions</p> <p>Gypsy and Traveller pitches</p> <p>Number of affordable housing completions (by tenure type)</p> <p>Mix of housing tenure</p> <p>Mix in dwelling sizes</p> <p>Provision of student/other specialist housing</p> <p>Number of households in housing need</p>	<p>50% affordable homes</p> <p>70:30 split between social and intermediate housing</p> <p>At least 40% affordable homes to be 3 bedrooms or more</p>	Annual	Annual Monitoring Report	<p>Allocation of Gypsy and Traveller pitches</p> <p>Provision of housing, including affordable housing</p>
2. To improve the health of the population	<p>Households with limiting long-term illness</p> <p>Mortality rate from circulatory diseases at age under 75</p> <p>Mortality rate from all cancers at age 75 of under</p> <p>Health life expectancy at age 65</p> <p>Number of people taking part in activities that improve physical and mental health in the borough</p> <p>Indices of deprivation: health deprivation and disability; barriers to housing and services domain; and living environment domains</p>		Every 10 years	ONS	<p>Encourage walking and cycling</p> <p>Maintain or improve access to healthcare</p>

3. To reduce poverty and social exclusion	Number of recorded racial incidents Indices of Multiple Deprivation Children in Poverty (under 16's)	Improve the London Borough of Lewisham's rank in the Indices of Multiple Deprivation	Every 3 years	CLG	Promote social cohesion and reduce poverty
4. To improve accessibility to leisure facilities, community infrastructure and key local services	Gain/loss of community/recreational facilities Delivery of identified social infrastructure Funding for community facility improvements secured	No net loss of recreational facilities	Annual	Annual Monitoring Report	Provision of leisure facilities, community infrastructure and key local services
5. To reduce crime, antisocial behavior and the fear of crime	Number of schemes incorporating 'secured by design' Indices of deprivation: Crime domain Number of offences per 1,000 population Numbers of types of crime per annum (Metropolitan Police) Reports of anti-social behaviour (Metropolitan Police) Indicators for the following: <ul style="list-style-type: none"> <li>• Violence against the person</li> <li>• Burglaries</li> <li>• Robberies</li> <li>• Violent crime</li> <li>• Sexual offences</li> </ul>		Annual	Office of National Statistics Metropolitan Police Service	Promote safety of the environment and social cohesion

<p>6. To reduce car travel and improve accessibility by sustainable modes of transport</p>	<p>Number of car parking spaces delivered in new development</p> <p>Number of completed car limited developments</p> <p>Number of car clubs and parking bays</p> <p>% of permitted major developments with a travel plan</p> <p>Proportion of journeys made on foot and by bicycle</p> <p>Number of electric car charging points</p> <p>Improvements to legibility and signage</p> <p>Improved pedestrian and cycle routes and crossings</p> <p>Number of cycle parking spaces provided for each new home or other development and public realm</p> <p>Improved lighting and natural surveillance on pedestrian and cycle paths</p> <p>Number of road accident casualties per 1,000 population serious or fatal</p> <p>Public transport accessibility levels</p> <p>Transport related CO2 emissions</p>	<p>Higher density development to be located within areas with a higher PTAL</p> <p>11% of total trips made by cycle or foot by 2025</p> <p>Year on year increase in number of electric car charging points</p> <p>All major developments to have travel plans</p> <p>All development permitted to include cycle facilities</p>	<p>As reviewed by Transport for London</p>	<p>Transport for London</p> <p>Census</p> <p>Annual Monitoring Report</p>	<p>Maximise accessibility of Gypsy and Traveller sites to services and public transport</p> <p>Enhance walking and cycling routes</p> <p>Reduce car ownership</p>
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<p>7. To mitigate and adapt to the impact of climate change</p>	<p>Number of homes achieving Code for Sustainable Homes level 4 or above granted/completed</p> <p>Number of BREEAM buildings granted/completed</p> <p>Number and capacity of decentralised energy granted/completed</p> <p>Number, type and capacity of renewable energy granted/completed</p> <p>Number and size of living roofs granted/completed</p> <p>Number of new developments incorporating water efficiency measures</p>	<p>Maximise renewable energy by type</p> <p>Increase in the number of living roofs and walls</p> <p>Year on year reduction in the carbon footprint of Lewisham</p> <p>All houses built to Code for Sustainable Homes Level 4</p> <p>All non-residential development built to BREEAM excellent standard</p>	<p>Annual</p>	<p>Annual Monitoring Report</p> <p>EA and Stockholm Environment Institute</p>	<p>CO2 reduction and energy efficiency</p> <p>Efficient use of natural resources</p>
<p>8. To improve air quality and water quality, manage water resources and reduce noise and vibration</p>	<p>Water pollution incidents</p> <p>Change in chemical river quality</p> <p>Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</p> <p>LLSOA Electricity and Gas consumption</p> <p>Per capita reductions in CO2</p> <p>Levels exceeding Main Air Pollutant Quality Standards</p> <p>Levels of NO2 and PM10</p>	<p>National Air Quality Strategy standards</p> <p>Reduction in noise complaints</p> <p>No decrease in water quality</p>	<p>Annual</p>	<p>Annual Monitoring Report</p> <p>London Air Quality Archive</p>	<p>Water management and SUDS implementation</p> <p>Minimise air pollution</p> <p>Reduce noise</p> <p>Consider compatibility of land uses</p>

	<p>Number of complaints related to noise from roads, construction, maintenance, noisy neighbours and/or other.</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p> <p>Estimated water consumption of new development</p>				
<p>9. To increase, maintain and enhance open space, biodiversity, flora and fauna</p>	<p>Area of designated habitats</p> <p>Number and size of biodiverse brown living roofs granted/completed</p> <p>Number of bat and other bird boxes delivered as part of new developments</p> <p>Number of applications granted or refused on designated open space and within SINCs</p> <p>Amount of new or improved open space provided, including that which provides a net gain for biodiversity and accessible natural greenspace</p> <p>Number of new allotments and community gardens</p> <p>Funding secured for open space improvements</p> <p>Waterways created, restored or enhanced</p>	<p>Year on year reduction in the ecological footprint of Lewisham</p> <p>Year on year increase in the number of bat and bird boxes provided with development</p> <p>No net loss of open space</p>	<p>Annual</p>	<p>Annual Monitoring Report</p> <p>EA and Stockholm Environment Institute</p>	<p>Efficient use of natural resources</p> <p>Maintain or enhance biodiversity importance</p> <p>Protect and enhance open space and linkages</p>

<p>10. To mitigate and reduce flood risk, improve water quality, manage water resources, and restore and enhance the river network.'</p>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defense grounds or water quality</p> <p>Number of SUDS granted and delivered</p> <p>Flooding incidents</p> <p>Condition of any flood defences</p>	<p>No applications granted contrary to Environment Agency advice</p>	<p>Annual</p>	<p>Environment Agency</p>	<p>Work in partnership with the Environment Agency</p> <p>Flooding and water management</p>
<p>11. To maintain and enhance landscapes and townscapes</p>	<p>Number of key views maintained and enhanced</p> <p>Pre applications and applications considered by the design review panel</p> <p>Number of interventions aimed at improving streetscapes</p> <p>Density of housing</p>	<p>All major applications to be referred to the design review panel</p>	<p>Annual</p>	<p>Annual Monitoring Report</p>	<p>Protect landscape and townscape</p>
<p>12. To conserve and where appropriate enhance the historic environment</p>	<p>Number of designated heritage assets (including listed buildings and conservation areas)</p> <p>Number of undesignated heritage assets (locally listed buildings, areas of archaeological significance)</p> <p>% of applications where archaeological strategies were developed and implemented</p> <p>Number of applications that have considered views of strategic importance</p>		<p>Annual</p>	<p>Annual Monitoring Report</p> <p>English Heritage</p>	<p>Protect heritage assets</p>

	<p>Number of conservation areas with up to date conservation area character appraisals or at risk (absent conservation area appraisal)</p> <p>Condition of designated and undesignated heritage assets</p>				
<p>13. To minimise the production of waste and increase waste recovery and recycling</p>	<p>% of waste recycled, reused or composted</p> <p>Tonnes of waste sent to landfill per year</p> <p>Residual household waste per year</p> <p>Amount of waste recycled on site by residents and employment industries</p>	<p>Residual waste per household in Lewisham</p> <p>2011/2012 720kg</p> <p>2012/2013: 718kg</p> <p>2013/2014: 716kg</p> <p>% of household waste sent for reuse, recycling and composting in Lewisham</p> <p>2013/2014: 21% waste recycled</p> <p>% household waste sent to landfill in Lewisham</p> <p>2011/2012: 7%</p> <p>2012/2013: 6.5%</p> <p>2013/2014: 6%</p>	<p>Annual</p>	<p>Strategic Waste and Management</p>	<p>Waste Management</p>

<p>14. to reduce land contamination and safeguard soil quality and quantity</p>	<p>Number of planning applications with the potential for land contamination</p> <p>Number of identified contaminated sites</p> <p>Number of new homes built on previously developed land</p>	<p>No reduction in soil quality</p>	<p>Every 10 years</p>	<p>Annual Monitoring Report</p>	<p>Land remediation</p>
<p>15. To encourage sustained economic growth</p>	<p>Area of employment land with mixed use employment location (MEL) and local employment location (LEL)</p> <p>Size and type of employment floorspace</p> <p>Amount of vacant employment floorspace</p> <p>Amount of new completed employment floor space</p> <p>New business registration rate</p> <p>Rent levels of employment accommodation</p>	<p>No loss of employment land</p> <p>Minimise vacant employment land</p> <p>Annual completion no net loss</p>	<p>Annual</p>	<p>Lewisham ELS</p> <p>London Borough of Lewisham GIS</p> <p>Annual Monitoring Report</p>	<p>Protection of employment sites</p> <p>Maintain a supply of a variety of employment floorspace</p>
<p>16. To promote access to employment, education, skills and training</p>	<p>Employee numbers in Lewisham</p> <p>Indices of deprivation: Education, skills and training domain</p> <p>% of businesses in the area showing employment growth</p> <p>Job density in Lewisham</p> <p>Number of employed and unemployed living in the area</p> <p>Numbers of employees and business owners who are BME</p>	<p>Increase in jobs</p> <p>Increase in percentage of local residents employed for specific development projects, including apprenticeships</p> <p>No reduction in job density</p>	<p>Annual</p>	<p>National Annual Business Inquiry</p> <p>Office of National Statistics</p> <p>Official Labour Market Statistics</p>	<p>Maximise and provide a range of local employment opportunities</p> <p>Protection of employment sites to secure local job opportunities</p> <p>Local labour agreements</p>

	<p>% of population of working age who claim unemployment benefit</p> <p>Number of pupils achieving 5 or more GCSE's at grades A* to C or equivalent</p> <p>% of population aged 16-74 with no qualifications</p> <p>Number of full and part time courses provided</p> <p>Number of full and part time people participating in educational courses/events in the area</p> <p>% of population in Lewisham with higher education qualifications</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p>	<p>Increase in employment rate</p> <p>Narrow gap to the GB average employment rate to no more than 3% points</p> <p>Year on year decrease in the number of people without qualifications in Lewisham</p>			
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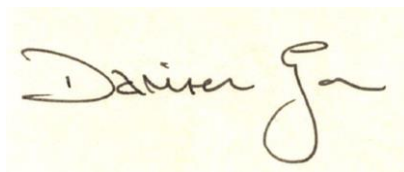
# Agenda Item 8

<b>Chief Officer Confirmation of Report Submission</b>		
<b>Cabinet Member Confirmation of Briefing</b>		
<b>Report for: Mayor</b>		
<b>Mayor and Cabinet</b>		X
<b>Mayor and Cabinet (Contracts)</b>		
<b>Executive Director</b>		
<b>Information</b> <input type="checkbox"/>	<b>Part 1</b> <input checked="" type="checkbox"/>	<b>Part 2</b> <input type="checkbox"/>
		<b>Key Decision</b> <input type="checkbox"/>

<b>Date of Meeting</b>	15 <sup>th</sup> November 2017	
<b>Title of Report</b>	Update on Fire Safety in Lewisham	
<b>Originator of Report</b>	Jeff Endean	<b>Ext. 46213</b>


At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources	X	
Legal Comments from the Head of Law	X	
Crime & Disorder Implications		X
Environmental Implications		X
Equality Implications/Impact Assessment (as appropriate)		X
Confirmed Adherence to Budget & Policy Framework	X	
Risk Assessment Comments (as appropriate)	X	
Reason for Urgency (as appropriate)		



Signed: \_\_\_\_\_ Executive  
Member

Date: \_\_\_\_\_ 07/11/2017 \_\_\_\_\_

Signed: \_\_\_\_\_ Director/Head of Service  


Date \_\_\_\_\_ 07/11/2017 \_\_\_\_\_

### Control Record by Committee Support

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	



Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	

Mayor and Cabinet		
<b>Title</b>	Update on Fire Safety in Lewisham	
<b>Wards</b>	All wards	
<b>Contributor</b>	Executive Director for Customer Services	Item
<b>Class</b>	Part 1 (open)	15 November 2017

## 1 Purpose

- 1.1 This report provides Mayor and Cabinet with an update on the national, London-wide and (in particular) Lewisham response to the Grenfell Tower fire in Kensington and Chelsea.
- 1.2 This report is being presented to Mayor and Cabinet due to the importance of fire-safety and the continuing developments both at a national, London and local level following the Grenfell Tower. Officers will bring a quarterly update report to Mayor and Cabinet.
- 1.3 As part of Lewisham's response, the report sets out the actions following the failure of cladding on three Council-owned tower blocks, and wider fire safety actions being undertaken on council properties.
- 1.4 The report outlines actions being undertaken in relation to private sector and registered provider building owners, in light of the most recent guidance from the Department for Communities and Local Government (DCLG)
- 1.5 The report also highlights the latest update on the financing of works relating to fire safety.

## 2 Recommendation

- 2.1 It is recommended that the Mayor notes the content of this report.

## 3 Background and context

- 3.1 During the early hours of 14 June 2017, Grenfell Tower, a 24 storey social housing block in Kensington & Chelsea, was engulfed and destroyed by fire. The Metropolitan Police estimated 80 people died in the fire, with the most up to date statement confirming 67 deaths.
- 3.2 The unprecedented scale of the Grenfell Tower tragedy, the horrific loss of life and impact upon victims' families and friends has resulted in a number of public enquiries and reviews.
- 3.3 The event has raised wider series of questions about the efficacy of civil contingency planning, impact of public spending cuts and suitability of regulatory controls. The longer term ramifications of these issues in terms of housing and other construction related policy and oversight are still to be worked through.

## 4 National Response

### Emergency response to victims

- 4.1 In the days following the fire, the Government announced a £5m support fund for victims of the blaze.
- 4.2 On the 15 June the Government launched a dedicated webpage which signposts victims to emergency funding, housing advice, counselling services, bereavement support, legal advice and other services.
- 4.3 On the 5th July an Independent Recovery Taskforce for Kensington and Chelsea Council was created to assist the Royal Borough of Kensington and Chelsea to deal with the longer term recovery of the fire.

### Public enquiry and wider investigation

- 4.4 A formal inquiry into the tragedy at Grenfell was announced on 29<sup>th</sup> June 2017. The inquiry is being chaired by Sir Martin Moore Bick, a retired Appeals Court Judge. The terms of reference were set on 15<sup>th</sup> August 2017, marking the start of the enquiry. The enquiry is expected to report in Spring 2018.
- 4.5 A dedicated website has been set up in relation to the enquiry and a full list of issues for investigation has been published.
- 4.6 On the 28<sup>th</sup> July 2017 DCLG announced an independent review of building regulations and fire safety, led by Dame Judith Hackett. The terms of reference were set on the 30<sup>th</sup> August 2017.
- 4.7 The review will assess the effectiveness of current building and fire safety regulations, and related compliance and enforcement issues. It will also address whether the large scale cladding testing programme identified systemic failures.
- 4.8 London Councils has coordinated and submitted a London-wide response to the independent building review consultation. The outcome of the consultation is expected in Spring 2018.

### Government testing and guidance on fire safety checks

- 4.9 On the 28<sup>th</sup> July 2017 DCLG announced the Building Safety Programme which aimed to identify buildings of concern through testing how different Aluminium Composite Material (ACM) cladding types react in a fire in combination with two forms of insulation.
- 4.10 The tests were carried out by the Building Research Establishment (BRE), and involved building a 9 metre tall demonstration wall with a complete cladding system – including panels and insulation – fixed to it, and then subjecting it to a fire that replicates a severe fire in a flat breaking out of a window and whether it then spread up the outside wall.
- 4.11 The DCLG released test results immediately after each test, publishing a final consolidated advice note on the 5<sup>th</sup> September 2017.

- 4.12 Seven combinations were tested. Four combinations failed and three combinations passed safety tests.
- 4.13 Further interim safety advice was published by the DCLG at the end of September. This outlined mitigating safety measures which owners of buildings with failed cladding should implement, until remedial works are completed, in liaison with the fire and rescue service.

#### Powers of Local Authorities regarding Private Sector buildings

- 4.14 On the 8th October 2017 the Department for Communities & Local Government issued clarification of the powers that they believe are available to Local Authorities as part of their ongoing Building Safety Programme. This is attached at Appendix A.
- 4.15 The DCLG point to the Housing Act 2004, which permits authorities to inspect and enforce where ACM cladding poses a hazard under the HHSRS.
- 4.16 DCLG also note that Authorities should seek their own legal guidance where they may be required to carry out an inspection or enforcement action against private building owners.

### **5 London Response**

- 5.1 London Councils met on 12<sup>th</sup> July 2017 to discuss the initial response to the fire and to provide assistance, advice and co-ordination to local authorities in London.
- 5.2 A board was established to facilitate ongoing co-ordination amongst councils, to share best practice and to ensure that member authorities have access to advice and support from across the region. The group provides overall strategic direction to the regional response.
- 5.3 The board also agreed that a technical board be set up to discuss guidance and recommendations produced by the DCLG, to advise authorities with regards to the detail of any such publication, and to work with DCLG and others as necessary to ensure the suitability and appropriateness of future guidance.
- 5.4 Officers from Lewisham Council are members of both boards and continue to work closely with officers at London Councils to provide updates and feedback on fire-safety related issues.

### **6 Fire safety in Lewisham: ACM cladding**

#### ACM cladding: Lewisham owned tower blocks

- 6.1 Lewisham Homes (LH) and Regenter B3 (RB3) manage Lewisham Council properties, including 81 tower blocks (71 LH, 10 RB3). No blocks under RB3 required testing by DCLG, but six blocks managed by LH did. Of these, three blocks failed the large scale testing test carried out by DCLG. These blocks are Hatfield Close 1-48, Hatfield Close 49-96 and Gerrard House, all in the New Cross area.

- 6.2 The priority at this stage is to remove the cladding as quickly and safely as possible. Lewisham Homes (LH) has appointed a contractor and professional services to remove and replace the cladding. Cladding removal is currently underway.
- 6.3 Full removal of cladding is expected by 8<sup>th</sup> December 2017, weather dependent.
- 6.4 The London Fire Brigade (LFB) conducted intrusive inspections at Hatfield and Gerrard blocks. All three blocks received notices listing fire safety works deemed necessary, which have been completed.
- 6.5 A follow up inspection by the LFB occurred in early October. The LFB were satisfied with the safety measures in place whilst the cladding was being removed.
- 6.6 Twenty-four hour fire wardens continue to be on site at three blocks to ensure resident safety until the cladding has been fully removed.
- 6.7 Residents continue to be updated and LH have arranged public meetings in consultation with the Tenant Resident Association as deemed necessary.

#### ACM cladding: Registered Provider owned tower blocks

- 6.8 There are a total of 67 tall building owned by registered providers in Lewisham.
- 6.9 In respect of blocks managed by registered providers in Lewisham, London and Quadrant (L&Q) have five blocks at Clyde Terrace which also failed the BRE testing carried out by the Building Safety Programme.
- 6.10 L&Q have informed us that they are currently in the planning stage to remove and replace the cladding on the affected blocks. These blocks are partially clad in ACM.
- 6.11 Goldsmiths University have also confirmed that none of their buildings in Lewisham have ACM cladding. They have also reassured us in relation to their fire risk assessment regime.

#### ACM cladding: Private providers

- 6.12 There are 42 tall buildings under private ownership. We have now been in correspondence with all of our private landlords who have tall buildings in Lewisham.
- 6.13 Those who have returned information have assured us as to the most recent Fire Risk Assessment and assurance of provision of fire safety information to residents.

- 6.14 Officers are currently in discussion with two building owners in relation to the nature of their responsibility to assure the Lewisham Council that their building does not have ACM cladding.
- 6.15 Our most recent communication has emphasised the DCLG guidance and responsibilities of building owners to understand and communicate to Lewisham Council any ACM cladding present on the building.
- 6.16 Officers are in the process off collating data returns to DCLG in relation to tall buildings, due for submission over the next few weeks. Our intention is that should officers not have heard from the building owners this will be reported to DCLG, and the London Fire Brigade notified.
- 6.17 Officers will seek legal advice, in line with DCLG guidance, should further action be needed in regards to compelling private owners to take action.

## **7 Wider fire-safety in Lewisham**

### Fire Risk Assessment surveys

- 7.1 Lewisham Homes have started a rigorous programme of detailed and intrusive Fire Risk Assessment (FRA) inspections which go beyond the usual standard. The assessments will involve testing of blocks to ensure that compartmentalisation is fully retained and to assess for any fire risks that may be concealed during a regular assessment.
- 7.2 The surveys will commence in October, starting with Eddystone and Daubeney blocks. Following this, a two year programme of intrusive inspections across all blocks over 6 stories will begin. These will be prioritised on a risk basis.
- 7.3 All regular FRAs across all Lewisham Stock, including buildings below 6 stories, are up to date and have been completed within the proper timeframe. A regular programme of regular FRA's is in place.
- 7.4 Regenter B3, who manage the PFI contract in the Brockley ward, are starting a programme of works identified during the most recent FRA inspections across the entirety of their estate.

### Sprinkler retro-fitting

- 7.5 Lewisham Homes already have a sprinkler installation programme for sheltered schemes budgeted at c£500,000
- 7.6 For full installation of sprinklers across all high-rise blocks and hostels is estimated to cost a further £17.5 million.
- 7.7 LH propose to assess viability and need of sprinkler systems as part of the two year intrusive FRA survey process.

## Fire doors

- 7.8 Independent tests on the installation of fire doors (installed as part of the decent homes work) have indicated some poor workmanship in the manufacturers' installation methods. This has been found across the sample of doors installed by the two main contractors.
- 7.9 As a result of the above, investigations are ongoing and work is starting on correcting the installation where needed. TRAs and residents will be fully informed and advised throughout all of this work.

## Sheltered Housing

- 7.10 Of the 18 sheltered schemes that are managed by Lewisham Homes, 15 have sprinkler systems installed.
- 7.11 The remaining three are in the process of receiving Sprinkler installations, with works at an advanced stage of completion in two of the blocks and works due to start in the remaining block during the week commencing 9th October.

## Hostels

- 7.12 All Fire Risk Assessments for hostels are up to date and the actions outlined in each FRA are being handled as appropriate.
- 7.13 Fire safety drills were undertaken in all Hostels in July to assess the readiness of tenants for an evacuation in the event of a fire.
- 7.14 Guidance has been issued to staff managing hostels to ensure the proper application of guidelines relating to fire safety.
- 7.15 Officers are considering the appropriateness of a sprinkler installation scheme for all Hostels that do not currently have a sprinkler system.

## **8 Funding of fire-safety related works**

- 8.1 The DCLG has maintained the position that 'as landlords, you will fund measures designed to make a building fire safe, and will draw on your own existing resources to do so' and that 'where a Local Authority has concerns about funding essential fire safety measures, they should approach us as soon as possible to discuss the position.' (Letter from The Rt Hon Sajid Javid MP to Chief Executives of Local Authorities and Registered Providers, dated 31<sup>st</sup> July 2017).
- 8.2 Based on estimates from a survey of Local Authorities conducted by London Councils, cladding removal is estimated at £1.4million per block. This is slightly lower than the Lewisham Homes estimate of £1.75million per block.
- 8.3 The London Councils analysis shows an average cost of £426k per block for sprinkler works, but with large variance between boroughs. Lewisham have modelled a lower figure of £212k per block (including all blocks above 6 stories and sheltered accommodation). Members should note that scope of works plays a huge part of this figure, and these figures are estimates only.

8.4 Based on current situation, costs related to the Councils social housing stock will be charged to the HRA, and grant funding will be applied for if available. Officers are currently looking at the implications for the HRA.

8.5 Regarding the funding of works, the Mayor of Lewisham has been in correspondence with Sajid Javid MP, copies of which are available at Appendix B. Lewisham Council continues to set out our concerns to the DCLG in relation to the cost of these works and further works.

## **9 Legal Implications**

9.1 There are no legal implications arising from this report.

## **10 Financial implications**

10.1 The purpose of this report is to update members on the Fire Safety Arrangements Following the Grenfell Tower fire. As such, there are no direct Financial Implications arising from this update.

10.2 The work currently being undertaken to ensure all fire safety arrangements are up to date, including removal of ACM cladding and fire patrols relating to LBL owned social housing stock is being covered by existing HRA management, repairs & maintenance and capital allocations.

10.3 As the situation develops, further detailed financial implications will be provided on each individual issue as they are reported on.

## **11 Crime and disorder implications**

11.1 There are no crime and disorder implications arising from this report.

## **12 Equalities implications**

12.1 There are no equalities implications arising from this report.

## **13 Environmental implications**

13.1 There are no environmental implications arising from this report.

## **14 Background Documents and Report Originator**

14.1 If you have any queries relating to this report please contact Jeff Endean on 020 8314 6213.





Department for  
Communities and  
Local Government

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*Director, Building Safety Programme*

*Department for Communities and Local Government*  
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[www.gov.uk/dclg](http://www.gov.uk/dclg)

8<sup>th</sup> October 2017

To: Local Authority Chief Executives,

**Identifying all residential tower blocks with Aluminium Composite Material (ACM) cladding: Legal Clarification**

Since Tamara Finkelstein wrote to you on 5<sup>th</sup> September, I have become aware of concerns a number of you have raised regarding the legal powers under which you can act should enforcement action be required.

I am therefore writing to you to provide DCLG's interpretation of **the Housing Act 2004, and the regulations and Housing Health and Safety Rating System made under it. DCLG's view is that the powers available to local authorities under this regime are available in respect of the external cladding systems of tall residential buildings.** In addition, I have set out reminders of additional enforcement powers which may be available in some circumstances. This is not intended to be an exhaustive list however and local authorities will need to make their own considerations based on the circumstances of each particular case. I would also like to remind you of existing guidance such as guidance on the Housing health and safety rating system (HHSRA) at <https://www.gov.uk/government/collections/housing-health-and-safety-rating-system-hhsrs-guidance>

DCLG's considered position as outlined in Annex A is that the 2004 Act, the Regulations and both sets of statutory guidance made pursuant to the 2004 Act, which comprise the HHSRS regime, are clearly designed and intended to ensure the safety of residents in relation to a range of prescribed hazards, including fire, many of which will derive from the construction of the wider fabric of residential buildings which are external to the elements of individual dwelling units. The safety of any cladding system fitted to a residential building over 18m (whether in respect of fire or structural integrity) is entirely within the scope of the HHSRS regime and amenable to statutory enforcement in appropriate cases. These powers can be considered and deployed with other potential enforcement action as identified above.

However, it is of course for each local housing authority to make its own decision about what is lawful on a case by case basis, and to take their own legal advice where necessary.

Any enforcement action taken by local housing authorities under the 2004 Act can be challenged on appeal to the First-tier Tribunal in the first instance, and ultimately it is for the Tribunal and the courts to make any determination about the application of these provisions on a case by case basis.

I hope you find the above helpful. If you have any further questions, please contact [housingchecks@communities.gsi.gov.uk](mailto:housingchecks@communities.gsi.gov.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. O'Connor'.

**Neil O'Connor**  
Director, Building Safety Programme Policy

## Annex A

1. DCLG considers that the provisions of the Housing Act 2004 (the “Act”) will be available in principle for local authorities to inspect and take enforcement action in respect of ACM cladding where that poses a hazard under the HHSRS.
2. DCLG’s view is that the regime is targeted wider than the individual units of occupation in a block. The legislation is designed with a number of different purposes in mind, not all of which are dealt with expressly in guidance, and there are no grounds to consider that the external cladding on a building is not caught by the regime. Taking samples of the cladding, if necessary under warrant, would fall within the regime and the local housing authorities’ enforcement powers under that regime at part 1 and 7 of the Act.
3. There are many examples in the legislation and guidance which support that this is the only sensible interpretation.

### **Housing Act 2004 (“the 2004 Act”)**

4. Under the 2004 Act, the section 1(4) definition of “residential premises” includes any common parts of a building containing one or more flats. The section 1(5) definition of common parts expressly includes the structure and exterior of the building **and therefore includes a cladding system on a residential block**, which is part of the exterior of a building.
5. The definition of hazard at section 2(1) includes health and safety risks arising from a deficiency in a dwelling or in any building or land in the vicinity. This is clearly beyond individual dwelling units. Hazard is cast widely – it includes not only the building (thus the cladding) but even the land in the vicinity, when a dwelling will fall within it.
6. The enforcement powers available to local authorities, in particular those at section 239 and section 240, but also all other relevant powers, must be interpreted in line with these earlier definitions in the Act which include common parts. Thus the powers are available in respect of cladding which might pose a hazard.

### **Housing Health and Safety Rating System (England) Regulations 2005 (the “Regulations”)**

7. Regulation 3(1) and paragraph 24 of Schedule 1 define a prescribed hazard for the purposes of the 2004 Act as including exposure to uncontrolled fire and associated smoke. Exposure to such a hazard is not confined to matters arising, for example, from the construction of elements within an individual dwelling unit, but will include aspects of the wider fabric of the building or structure within which the unit is located.
8. Within Schedule 1 there are other examples of prescribed hazards which will likely derive from the wider fabric of a building, including paragraph 29 (“structural collapse and falling elements”). Such hazards clearly require consideration and inspection of a building’s wider structural elements. Indeed, if there was a potential for cladding

panels to fall from a building because of defects or deterioration in their fixings, this is a matter which would fall within the ambit of the hazard defined by paragraph 29. There can be no valid reason to exclude such panels from consideration of any exposure to uncontrolled fire and smoke which they might present.

9. Regulation 3(2) prescribes that the risk of harm arising from hazard may be at a dwelling or house in multiple occupation (HMO), or “in any building or land in the vicinity of the dwelling or HMO”. Again, it is clear that a hazard is not confined to circumstances pertaining in an individual dwelling unit, but is defined in much wider terms, consistent with the provisions in the 2004 Act referred to above.
10. In relation to the requirement to consult with fire and rescue authorities imposed by section 10 of the 2004 Act, regulation 4 prescribes that a fire hazard is where the risk of harm is associated with exposure to uncontrolled fire and associated smoke. This duty is not restricted to circumstances which concern only an individual dwelling unit.
11. Even if there was ambiguity in the interpretation of provisions of the 2004 Act and underlying regulations (and DCLG does not consider that there is such ambiguity), the regime as a whole must be interpreted purposively so as to ensure the safety of residences in respect of fire hazards.
12. In any event, DCLG’s interpretation of the primary legislation, as set out above, is also confirmed by the statutory guidance issued pursuant to section 9 of the 2004 Act.

### **Housing Health and Safety Rating System - Operating Guidance**

13. At paragraph 1.1.2 of the Operating Guidance:

*“The underlying principles of the HHSRS is that –*

***Any residential premises should provide a safe and healthy environment for any potential occupier or visitor”.***

14. Paragraph 1.13 of the Operating Guidance is explicit that the materials with which a dwelling is constructed are within the regime; it follows that external cladding materials are within the scope of the rating system.
15. Paragraph 4.03 of the Operating Guidance makes clear that the external parts of the dwelling are expressly covered in the context of inspections.
16. At paragraph 5.03 of Operating Guidance the list of what should be included in an assessment includes at sub-paragraph (d) “the building associated with the dwelling” i.e. encompassing the wider fabric of a building which may contain several individual dwelling units.
17. Paragraphs B17 to B19 of Annex B of the Operating Guidance (Inspections for an HHSRS Assessment) explicitly mention the exterior of the building.

Annex D of the Operating Guidance (Profiles of potential health and safety hazards in dwellings) covers potential types of hazard. In particular, at paragraph 29.01 – there is the need to assess the external structure of the building. Although this is about risks of fabric being displaced or falling, it shows that the external aspects of the building are in scope of an assessment. Cladding is specifically mentioned in this context, at 29.08 and at 29.18.

### **Housing Health and Safety Rating System – Enforcement Guidance**

18. In the Enforcement Guidance, paragraphs 6.6 - 6.11 specifically contemplate deficiencies external to any individual dwelling unit leading to enforcement action against the wider building owners.

19. In particular, paragraph 6.9 deals expressly with a deficiency relating to the structure which should be dealt with by a notice on the person that owns the building.

20. It follows from the above that DCLG considers that there should be no doubt about the ability to use the enforcement powers under the 2004 Act to address ACM cladding deficiencies which may give rise to fire hazards.

21. In addition, there are other relevant enforcement powers which we summarise below.

### **Building Act 1984**

22. Where building work has been carried out in breach of the Building Regulations, especially where such work has been recently completed, local authority building control bodies may:

- a. enter any premises at reasonable hours for the purpose of undertaking their functions under the Building Act and building regulations. This includes to ascertain whether there is, or has been a contravention of the Building Act or of any building regulations, and to take any action or execute works required by the Building Act or regulations where the local authority is authorised or required to do so (section 95). If admission to the premises is refused, a justice of the peace may issue a warrant under section 95(3) and 93(4);
- b. serve an enforcement notice on a building owner to require the removal or alteration of work that does not comply with the Building Regulations under section 36(1). Such a notice must be served within 12 months of the date of completion of the building works in question as per section 36(4). If the enforcement notice is not complied with the local authority may itself take action to remove the offending work or effect such alterations in it as it deems necessary (section 36(3));
- c. prosecute contraventions of the Building Regulations through summary proceedings in the magistrates' court (section 35), within six months of the breach being discovered, provided that action is taken within two years of completion of the building work that is in breach (section 35A).

# Mayor calls on government to fund fire safety work in Lewisham

Published on 10 July 2017

**The Mayor of Lewisham, Steve Bullock, has urged the government to fund the removal of external cladding from three Lewisham tower blocks.**

In a letter to Sajid Javid MP, Secretary of State for Department for Communities and Local Government, Steve Bullock said

The government should fund the removal of external cladding from three Lewisham tower blocks. Can you confirm the Prime Minister's commitment to support local authorities with funding in London and across the country, still stands, and when any money would be available for this vital work? Leaseholders in Lewisham should not be charged for this vital work, as they would be for general building improvements to their properties.

The full letter from Mayor of Lewisham to Sajid Javid is copied below

Rt  
Hon Sajid Javid MP  
Department for Communities and Local Government,  
2  
Marsham Street,  
London,  
SW1P 4DF

06/07/2017

Dear  
Sajid,

Re: Fire safety funding

Following the horrific fire at Grenfell Tower, council staff and those of our ALMO, Lewisham Homes and other housing providers have worked around the clock to ensure any buildings in Lewisham with external aluminium cladding are checked and tested so our residents are safe.

Last week the removal of cladding from three buildings in New Cross managed by the ALMO was ordered, following the results of Government fire safety tests. We have also put 24-hour fire safety patrols into each of the buildings to keep residents safe. Lewisham Council has also written to every individual or organisation who owns a tower block to remind them of their duty to have an up-to-date fire risk assessment.

As you know we have also deployed over 30 council employees to Kensington and Chelsea to run rest centres and support people who have been made homeless as well as releasing my Chief Executive to take over on an interim basis.

I welcomed the Prime Minister's commitment on 25 June that the government would be "supporting local authorities", and, "making sure that the resources are there to make sure what is needed to keep people safe is being done."

But I was concerned that on 27 June it was reported your departmental spokesperson had said there was, "no guarantee" of government funding and that it would be "up to local authorities and housing associations to pay" and that financial support would be considered on a "case by case" basis.

At this early stage we don't know how much the detailed work to remove cladding and make the subsequent repairs to the three buildings will cost, but it is likely to be considerable. I am also clear that leaseholders should not be charged for this vital work, as they would be for general building improvements to their properties.

It was therefore disappointing that your speech to the LGA Conference did not clarify the willingness of the government to underwrite the costs which my authority and many others will incur.

I would therefore be grateful if you would now confirm if the Prime Minister's commitment to support local authorities with funding, in London and across the country, still stands, and when any money would be available for this vital work.

Sir  
Steve Bullock  
Mayor of Lewisham

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Department for  
Communities and  
Local Government

Sir Steve Bullock  
Mayor of Lewisham  
Lewisham Council  
Civic Suite  
Catford  
London SE6 4RU

Email: [steve.bullock@lewisham.gov.uk](mailto:steve.bullock@lewisham.gov.uk)

**The Rt Hon Sajid Javid MP**

*Secretary of State for Communities and Local Government*

*Department for Communities and Local Government*

4th Floor, Fry Building  
2 Marsham Street  
London SW1P 4DF

Tel: 0303 444 3450

Fax: 0303 444 3289

E-Mail: [sajid.javid@communities.gsi.gov.uk](mailto:sajid.javid@communities.gsi.gov.uk)

[www.gov.uk/dclg](http://www.gov.uk/dclg)

Our Ref: 3420965

26 July 2017

Dear Sir Steve,

Thank you for your letter to my Department about the position on funding for works you consider necessary to buildings following the Grenfell Tower fire. We recognise that local authorities as landlords will be working hard to ensure that their buildings are safe and we appreciate you getting in touch with details of the position you are in, which my officials are considering in detail.

We have been clear that we will ensure that financial barriers don't prevent essential fire safety work from being done, and I wanted to reply to you now to give you further detail about how as a landlord you can determine what work will be necessary, and when support will be available.

As you may know, the Building Research Establishment is currently carrying out further tests to determine the fire safety risks associated with buildings. Those tests are well underway, and as we get results we will be writing separately to authorities who may be affected based on information that authorities have already provided about buildings in their area. This will be an on-going process over the next few weeks. If you would like to receive updates about the progress of these tests, you can sign up for alerts at – [www.gov.uk/guidance/building-safety-programme](http://www.gov.uk/guidance/building-safety-programme)

Our expectation is that, as a building owner, you will fund measures designed to make a



building fire safe, and will draw on your existing resources to do so.

Local fire services should provide advice on the essential safety measures to make residential buildings safe, and alongside this landlords should take professional advice (e.g. from a qualified engineer with relevant experience in fire safety) on any essential work they may need to take on their cladding system to make it safe. Essential work would be any measures required to meet the requirements of current Building Regulations guidance.

Once you have a clear idea of the work that is deemed to be essential, if you still have concerns about funding essential fire safety measures, you should approach us again as soon as possible to discuss your position. Where works have been advised by local fire services to be essential to ensure the fire safety of a building, we will ensure that lack of financial resources will not prevent them going ahead. Any support provided would not include general improvements, or enhancements to buildings, which go beyond this.

Whilst we recognise the desire to carry out other work, if this is not deemed essential, this is a decision that must be taken by and funded by the local authority. If you would like to discuss the matter further then please do get in touch again, or you can send an email to [localauthorityhousing@communities.gsi.gov.uk](mailto:localauthorityhousing@communities.gsi.gov.uk) .

A handwritten signature in black ink, appearing to read 'S. Javid', with a small comma at the end.

**THE RT HON SAJID JAVID MP**



Rt Hon Sajid Javid MP  
Secretary of State  
Department for Communities and Local  
Government,  
2 Marsham Street,  
London,  
SW1P 4DF

Sir Steve Bullock  
Mayor of Lewisham  
Civic Suite  
Catford  
London SE6 4RU

[steve.bullock@lewisham.gov.uk](mailto:steve.bullock@lewisham.gov.uk)

17/08/2017

Dear Sajid,

Thank you for your correspondence dated 26 July 2017, in which you outline the DCLG position on funding for essential fire safety works.

In my letter dated 6th July 2017, I expressed my concern that that the government was appearing to retract its initial offers of financial support. As I outlined, the financial costs of dealing with the three buildings in Lewisham that had failed the first set of BRE tests is likely to be considerable. Since writing to you, the same blocks have failed the second tests at category three. We are now in the process of gathering the exact costings of the following essential works for which we would like Government help:

- Fire safety wardens
- Scaffolding for all tower blocks where identified cladding requires immediate removal
- Assorted costs involved in this removal, including surveyors fees, contractor fees and associated construction costs
- Assorted costs involved in recladding the properties, including sourcing new and confirmed safe cladding and contractor and construction costs as above
- Costs associated with parking re-zoning and alterations to tower access to ensure adequate access for emergency services
- Retro-fitting sprinkler systems

There are also escalating costs associated with fire safety on a further 3 blocks which are fully clad and 5 partially clad in non-ACM materials. These blocks are undergoing rigorous surveying and testing. We do not have final figures as yet but early indications are that the cost will be at least £10m.

I know that we share a commitment to the safety of all residents and I think we are both clear that cladding is not the only fire risk. Like other local authorities we are putting in place arrangements to undertake intrusive fire risk assessments in all our blocks which includes a further 62 non clad blocks. These more extensive investigations are expected to result in further works at additional costs including the installation of sprinklers where appropriate.

We are keeping a record of essential fire safety related costs and will provide details when appropriate to do so.

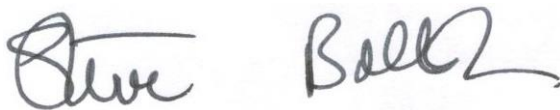
None of these additional works and costs could have been accounted for in the HRA business plan and will impact on our ability to invest in other areas and indeed to build further new housing. It is disappointing to learn that there is limited financial support on offer to assist us in completing this essential work, with an expectation that local authorities “draw on

[their] own existing resources” to carry out essential works. I would urge that this position be reviewed as the figures become clearer.

There is high demand across the country to carry out works on affected buildings in a timely manner, with local authorities seeking professionals to source safe materials and perform any necessary construction work. Without any regional or national coordination of these efforts, it is likely we will be competing against neighbouring authorities for the same resources to undertake this work, possibly at inflated prices. We await further details on the Industry Response Group and its remit to assist us with these concerns.

As you know I am the executive lead member on Housing for the London Boroughs and I work closely with my Conservative colleague, Cllr Ravi Govindia. Might I suggest that it would be useful for us to meet in September along with officials from your Department and London Councils to consider how the growing financial burden faced by London authorities in this context can be met?

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Bullock', written in a cursive style.

**Sir Steve Bullock**  
Mayor of Lewisham

CC: Cllr Ravi Govindia, Leader of LB Wandsworth,  
Heidi Alexander MP,  
Vicky Foxcroft MP,  
Ellie Reeves MP



Department for  
Communities and  
Local Government

Sir Steve Bullock  
Mayor of Lewisham  
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**The Rt Hon Sajid Javid MP**  
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London  
SW1P 4DF

Tel: 0303 444 3450  
Fax: 020 7035 0018  
[www.gov.uk/dclg](http://www.gov.uk/dclg)

Our Ref:3460606

25 AUG 2017

*D. Shen -*

Thank you for your letter of 17 August concerning funding arrangements for fire safety works.

As I said in my letter to all local authority Chief Executives on 31 July, the starting assumption is that authorities, as the landlord, will fund the costs of necessary work. However, there may be circumstances where Government would consider the removal of financial restrictions to enable works to go ahead. This would only be the case where the fire and rescue service have identified essential fire safety measures, or where you are incurring costs to remove and replace cladding because of failed ACM tests. The support would not extend to additional fire safety measures that are not essential.

I note your comments regarding the cost of fire safety work. It is important that an assessment is made of the essential fire safety measures needed on a building by building basis.

If you would like to explore what options may be available, then could I ask you to provide my officials with more detail in response to the attached list of questions. Once we have received the information we will be in contact to discuss the detail. Please send your reply to:

[localauthorityhousing@communities.gsi.gov.uk](mailto:localauthorityhousing@communities.gsi.gov.uk)

  
RT HON SAJID JAVID MP

<b>Chief Officer Confirmation of Report Submission</b>	
<b>Cabinet Member Confirmation of Briefing</b>	
Report for: Mayor	<input type="checkbox"/>
Mayor and Cabinet	<input checked="" type="checkbox"/>
Mayor and Cabinet (Contracts)	<input type="checkbox"/>
Executive Director	<input type="checkbox"/>
Information <input type="checkbox"/> Part 1 <input checked="" type="checkbox"/> Part 2 <input type="checkbox"/> Key Decision <input type="checkbox"/>	

Date of Meeting	15 <sup>TH</sup> November 2017	
Title of Report	Response to Sustainable Development Select Committee - fire safety in tall buildings	
Originator of Report	Freddie Murray	Ext.43914

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources		X
Legal Comments from the Head of Law		X
Crime & Disorder Implications		X
Environmental Implications		X
Equality Implications/Impact Assessment (as appropriate)		X
Confirmed Adherence to Budget & Policy Framework		
Risk Assessment Comments (as appropriate)		
Reason for Urgency (as appropriate)		

Signed:  Executive Member

Date: 6/11/17

Signed:  Director/Head of Service

Date: 7-11-17

**Control Record by Committee Support**

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	

<b>Mayor and Cabinet</b>			
<b>Report Title</b>	Response to Sustainable Development Select Committee, fire safety in tall buildings.	<b>Item No</b>	
<b>Contributors</b>	Executive Director for Customer Services and Executive Director for Resources & Regeneration		
<b>Class</b>	Part 1	<b>Date</b>	15 November 2017

**1. Purpose of paper:**

- 1.1. At its meeting on 20 July 2017 the Sustainable Development Select Committee asked officers questions regarding fire safety in tall building, for presentation back to Mayor and Cabinet.
- 1.2. This paper sets out the responses from the referral.

**2. Recommendations:**

- 2.1. It is recommended that Mayor and Cabinet note the responses laid out below in response to the queries raised by the Sustainable Development Select Committee.

**3. Referral from the Sustainable Development Select Committee:**

- 1.1. At its meeting on 20 July 2017, the Sustainable Development Committee noted the report 'Fire Safety in Tall Buildings' which provided a comprehensive update on the work undertaken in relation to fire safety post the fire in Grenfell Tower.
- 1.2. The Committee made a number of referrals in relation to tall buildings and building control. The responses, as far as officers are able to answer, are laid out below.

**4. Referral 1: publically available list of tall buildings**

Referral

- 4.1. The Committee requests that a publicly available list of all tall buildings in the borough be produced for ease of reference. This should contain a summary of fire safety activities, that can be cross checked against each building, with the action taken and assurances provided to date. This would include, for example, dates on key building control actions, whether private or council, fire safety inspections, LFB inspections, cladding checked or not etc.

Response

- 4.2. Attached at Appendices A, B and C is the list of all tall residential buildings in Lewisham, with detail against each one as to actions taken to ensure fire-safety. There are further non-residential buildings which are likely to be over 18m in height, including the Lewisham Old Town Hall and Laurence House, and parts of Lewisham Hospital. These have not been included so far on these lists, however it will be updated over time to include them.
- 4.3. There are a considerable number of buildings on the list and Officers are still working through some of the detail around building regulations approval, where it has been required, and the dates associated with those. Where there is no commentary, then there are no records in relation to Building Regulations approval.

## **5. Referral 2: Council responsibilities as part of building control**

### Referral

- 5.1. Officers have agreed to provide additional information about the Council's responsibility for buildings for which it has provided building control services. The checklist for buildings (requested above) would need to include actions taken by officers to meet all building control requirements in those buildings. This information should also be provided to the fire service.

### Response

- 5.2. It is the responsibility of the developer, in conjunction with their chosen Building Control Body (local authority or Approved Inspector), to demonstrate that the building regulations have been satisfied.
- 5.3. Regulations cover a wide variety of items within the building such as the layout of the floors, materials, structural and fire safety, energy efficiency, drainage, accessibility amongst other things.
- 5.4. Due to the highly complex nature of developments, there is no standardised 'checklist' of building control activities. However, Officers have set out below the stages, and procedure, the Council's Building Control service follow when providing Building Regulations approval on a development/building.

### Stage 1 – Post Planning Permission

- 5.5. Plans are submitted to the Council detailing, amongst other things, foundations and drainage proposals, materials for external and internal finishes, elevations, cross-sections. A Building Surveyor will check the plans thoroughly, liaising with the developer/contractor until they are satisfied the plans propose a compliant development. Surveyors ensure that the plans meet all relevant technical requirements of the regulations. The plans are then passed or passed subject to certain conditions.

### Stage 2 – Development/Construction

- 5.6 Officers will undertake site visits at regular stages through development. Inspections are based on risk assessments. Normally, there would be intensive inspections in early and final stages. In the early stages, foundations and drainage below ground would be targeted. Essentially the inspections would focus on critical elements that would be covered up during construction. In the final stages, the focus would be on items such as fire safety, above ground drainage, etc. These inspections are limited in that surveyors are not always able to inspect every aspect of a building's construction. Periodic inspections would pick up issues of non-compliance which are then addressed through the construction process, rather than at the end. The developer is responsible for demonstrating compliance with the regulations. Building Control Body is there to verify compliance as far as it is practicable.

### Stage 3 – Building Sign Off/Approval

- 5.7 Following practical completion of the development the Council will usually approve the development. This is where Building Control involvement ends, unless or until further changes are made to the building which require approval under Building Regulations.
- 5.8 Approvals under Building Regulations can be issued by the local authority or an Approved Inspector (private sector 'for profit' providers of Building Control that operate in direct competition with local authority Building Control teams). When a developer chooses to work with an Approved Inspector, local authorities do not have any powers to intervene or enforce the regulations unless the projects is returned to the local authority by the Approved Inspector.
- 5.9 Where building work is being undertaken within existing buildings the person carrying out the work has a responsibility to demonstrate that both the building work complies with the requirements of the building regulations and that these works do not make any other parts of the existing building any worse in terms of compliance.

- 5.10 **Question 3:**

### Referral

- 5.11 The Committee is concerned about the complex technical nature of some of the materials and machinery being used in new developments. The Committee therefore recommends that officers be tasked with considering what expert advice the appropriate Council Committees need when making decisions in relation to new developments.



## Response

- 5.12 Planning decisions taken by planning committee are made based on the planning merits only with applications judged against the relevant planning policy plus any other material considerations. Fire safety is not a planning consideration and instead is the responsibility of the Building Regulations regime and as such is not a consideration at the planning application stage. Whilst applications do usually provide detail around materials such as cladding and other building finishes, the technical elements of the building, and how they are constructed, are not part of the planning consideration and the exact detail of construction is generally not known at the planning application stage. Such details are considered as part of the Building Regulations process and are approved by the Council, or externally if they are approved by the private sector.
- 5.13 While there is no formal role for the planning committee in this matter, Officers do recognise that there is an understandable concern about ensuring that everything is done to make sure that new developments are safe. As such, officers are considering wording for a new informative to emphasise the need for early engagement with Building Control and to highlight the need for new development to have full regard to Building Regulations and the need to ensure the safety of all future residents.

## **6 Financial Implications**

- 6.1 There are no financial implications arising directly from this report.

## **7 Legal Implications**

- 7.1 There are no legal implications arising directly from this report.

## **8 Equalities implications**

- 8.1 There are no equalities implications arising directly from this report.

## **9 Crime and Disorder implications**

- 9.1 There are no crime and disorder implications arising directly from this report.

## **10 Environmental implications**

- 10.1 There are no environmental implications arising directly from this report.

Report Author: Freddie Murray – Service Group Manager for Property, Asset Strategy & Estates: [Freddie.murray@lewisham.gov.uk](mailto:Freddie.murray@lewisham.gov.uk) / 020 8314 3914

Address	Landlord	FRA	Additional checks undertaken?	ACM Cladding and action?
HATFIELD CLOSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	ACM cladding identified and in process of being removed. Wardens in place
HATFIELD CLOSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	ACM cladding identified and in process of being removed. Wardens in place
GERRARD HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	ACM cladding identified and in process of being removed. Wardens in place
ASHLEIGH POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
CLAIRVILLE POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
DEEPDENE POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
HEATHWOOD POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
ROSEMOUNT POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
DAUBENEY TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
EDDYSTONE TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
KENDER STREET	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
Syringa House	Lewisham Council (RB3)	Up to Date		No ACM identified
Alder House	Lewisham Council (RB3)	Up to Date		No ACM identified
Jasmin House	Lewisham Council (RB3)	Up to Date		No ACM identified
Myatt Court	Lewisham Council (RB3)	Up to Date		No ACM identified
Veronica House	Lewisham Council (RB3)	Up to Date		No ACM identified
Conifer House	Lewisham Council (RB3)	Up to Date		No ACM identified
Holly Tree House	Lewisham Council (RB3)	Up to Date		No ACM identified
Poplar House	Lewisham Council (RB3)	Up to Date		No ACM identified
Foxborough Gardens (Block 1)	Lewisham Council (RB3)	Up to Date		No ACM identified
Foxborough Gardens (Block 2)	Lewisham Council (RB3)	Up to Date		No ACM identified
RAWLINSON HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
HAWKE TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
MILTON COURT ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
MILTON COURT ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
NEWBRIDGE POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
RADCOT POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
STANDLAKE POINT	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
ELIOT BANK	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
ELIOT BANK	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
ELIOT BANK	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
ELIOT BANK	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
GREYSTEAD ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
SHIRBURN CLOSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
WOOD VALE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
WOOD VALE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
HAZEL GROVE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
CAMBRIA HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
LONGHEDGE HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
PEMBERTON HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
SHAMROCK HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
TARQUIN HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
BELL GREEN LANE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
BELL GREEN LANE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
BELL GREEN LANE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
PORTCAWE ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
WINCHFIELD ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified

WINCHFIELD ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
WINCHFIELD ROAD	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
MILFORD TOWERS	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
MILVERTON HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
MILFORD TOWERS	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
ROSENTHAL HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
DOLPHIN TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
LAPWING TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
MARINE TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
MERMAID TOWER	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
ASHFORD HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
HOWARD HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
WARDALLS HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
GIFFIN STREET	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
CITRUS HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
ARGOSY HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
BEMBRIDGE HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
BENCE HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
CLEMENT HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
HARMON HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
LANYARD HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
PELICAN HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
PENDENNIS HOUSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
ARLINGTON HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
CORNBURY HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
LANGFORD HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
PITMAN HOUSE	Lewisham Council (Lewisham Homes)	Up to Date	Visual inspection undertaken and adequate fire safety measures in place	No ACM identified
TRUNDLEYS TERRACE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
LETHBRIDGE CLOSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
LETHBRIDGE CLOSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified
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LETHBRIDGE CLOSE	Lewisham Council (Lewisham Homes)	Up to Date		No ACM identified

Address	Provider/Landlord	Building Control	FRA	Agent/Applicant/Inspector	Key Actions & Dates
Ingres Apartments (Clyde Terrace)	L&Q	Council	Not LBL Owned	Applicant: <b>Arrendana South East Limited</b> , Unecol House, 819 London Road, North Cheam SM3 9BN Agent: <b>BPTW Partnership</b> Hiltons Wharf, Norman Road, Greenwich SE10 9QX	Last Inspection: <b>05/03/08</b> Inspector: <b>BOS</b> Completion Date: <b>05/03/08</b>
Manila Apartments (Clyde Terrace)	L&Q	Council	Not LBL Owned	Applicant: <b>Allenbuild South East Limited</b> , Unecol House, 819 London Road, North Cheam SM3 9BN Agent: <b>BPTW Partnership</b> Hiltons Wharf, Norman Road, Greenwich SE10 9QX	Last Inspection: <b>05/03/08</b> Inspector: <b>BOS</b> Completion Date: <b>05/03/09</b>
Azure Apartments (Clyde Terrace)	L&Q	Council	Not LBL Owned	Applicant: <b>Allenbuild South East Limited</b> , Unecol House, 819 London Road, North Cheam SM3 9BN Agent: <b>BPTW Partnership</b> Hiltons Wharf, Norman Road, Greenwich SE10 9QX	Last Inspection: <b>05/03/08</b> Inspector: <b>BOS</b> Completion Date: <b>05/03/10</b>
Quadrille Apartments (Clyde Terrace)	L&Q	Council	Not LBL Owned	<b>East Limited</b> , Unecol House, 819 London Road, North Cheam SM3 9BN Agent: <b>BPTW Partnership</b> Hiltons Wharf, Norman Road, Greenwich SE10 9QX	Last Inspection: <b>05/03/08</b> Inspector: <b>BOS</b> Completion Date: <b>05/03/11</b>
Ream Apartments (Clyde Terrace)	L&Q	Council	Not LBL Owned	<b>East Limited</b> , Unecol House, 819 London Road, North Cheam SM3 9BN Agent: <b>BPTW Partnership</b> Hiltons Wharf, Norman Road, Greenwich SE10 9QX	Last Inspection: <b>05/03/08</b> Inspector: <b>BOS</b> Completion Date: <b>05/03/12</b>
Meadowcroft Mews, George Lane, SE6 (Rushey Green)	L&Q		Not LBL Owned		No records on system
01-17 Bluebell House, Copperwood Place, SE10 8GB	Family Mosaic		Not LBL Owned		No records on system
1-78 JUBILEE HEIGHTS PRIMROSE WAY LONDON SE10 8FN	Family Mosaic		Not LBL Owned		No records on system
BLK 1-20 Mulberry House Parkside Avenue London SE10 8FW	Family Mosaic		Not LBL Owned		No records on system
BLK 1-50 Mountsfield House Primrose Way London SE10 8FL	Family Mosaic		Not LBL Owned		No records on system
BLK 2-43 Kestrel House Parkside Avenue London SE10 8FP	Family Mosaic		Not LBL Owned		No records on system
Flats 1-17 Blossom House Hillside Avenue London SE10 8GB	Family Mosaic		Not LBL Owned		No records on system
Flats 1-18 Liberty House Silverwood Place London SE10 8FZ	Family Mosaic		Not LBL Owned		No records on system
Flats 1-26 Osprey House Copperwood Place London SE10 8FY	Family Mosaic		Not LBL Owned		No records on system
Flats 1-56, Gentian House, Blackheath Hill, SE10 8FJ	Family Mosaic		Not LBL Owned		No records on system
1 Avonley Road, New Cross, London	Hyde		Not LBL Owned		No records on system
1-22 Wardalls Grove,	Hyde		Not LBL Owned	Applicant: <b>Osborne Homes</b> , Mercers Manor Barns. Manopr Farm, Sherrington, Newport Pagnell MK16 9NN Agent: <b>Butler and Young Limited</b> , Trenton House, Imperial Way, Croydon CR0 4RR	Last Inspection: <b>21/10/16</b> Inspector: <b>AI</b> Completion Date: <b>21/10/16</b>
1-80 The Drakes, The Drakes, 390 Evelyn Street, Deptford	Hyde		Not LBL Owned		No records on system
1-56 Orchard Court, Bell Green	Clarion		Not LBL Owned		No records on system
57-97 Orchard Court, Bell Green	Clarion		Not LBL Owned		No records on system
98-122 Orchard Court, Bell Green	Clarion		Not LBL Owned		No records on system
Aurora House, Bromley Road	Clarion		Not LBL Owned		Insufficient information details to carry out search.
St Peters Gardens	Clarion		Not LBL Owned		No records on system
Leybridge Court A, Leybridge Estate	Clarion	Council	Not LBL Owned		No records on system
Leybridge Court B, Leybridge Estate	Clarion	Approved Inspector	Not LBL Owned		No records on system
Leybridge Court C, Leybridge Estate	Clarion	Approved Inspector	Not LBL Owned		No records on system
Merridale, Leybridge Estate	Clarion		Not LBL Owned	CODE LC HBAS ZZZZ 6210 9999 Applicant: <b>Lewisham Homes, Home Park Housing Office</b> Winchfield Road, Sydenham SE26 5TH Agent: <b>Pellings Ltd</b> , 24 Widmore Road, Bromley BR1	Last Inspection: <b>06/05/09</b> Inspector: <b>KF</b> Completion Date: <b>06/05/09</b>
Nara building, Connington Road	Clarion		Not LBL Owned		
Astral House, Bromley Road	Clarion		Not LBL Owned		Insufficient information details to carry out search.

Aube House, Bromley Road	Clarion		Not LBL Owned		Insufficient information details to carry out search.
52-54 Thurston Road	Family Mosaic	Approved Inspector	Not LBL Owned	REF: BCP/12/10330 Applicant: <b>PDR Construction Ltd</b> , Waverley House, 7-12 Noel Street W1F 8GQ Agent: <b>Building Control Partnership Ltd</b> , 118A Boothferry Road, Goole, East Riding of Yorkshire DN14 6AG	Last Inspection: <b>26/03/15</b> Inspector: <b>AI</b> Completion Date: <b>26/03/15</b>
11-28 Mill House, Elder Walk, Lewisham, London, SE13 7EN	L&Q		Not LBL Owned	Applicant: <b>Galliard Homes</b> , Sterling House, Langston Road, Loughton IG10 3TS Agent: <b>Alan Camp Architects</b> , 88 Union Street SE1 0NW	No Inspection Record on System
1-9 Tower Court, Foxberry Court, Brockley, London, SE4 2SY	L&Q		Not LBL Owned		No records on system
Flats 1-32, 1 Concorde Way, Rotherhithe, London, SE16 2PY	L&Q		Not LBL Owned		No records on system for 1-32
Kingsfield House, Lambcroft Avenue, London, SE9 4PG	L&Q		Not LBL Owned		No records on system
73 - 143 Sandstone Road, Grove Park, London, SE12 0UT	L&Q		Not LBL Owned		No records on system
Merryfield House, Grove Park Road, London, SE9 4PR	L&Q		Not LBL Owned	Applicant: <b>L&amp;Q</b> , Renway House, Artillery Place SE18 4AB Agent: <b>The Apollo Group</b> , Conquest House, Church End, Waltham Abbey EN9 1DX	Last Inspection: <b>22/10/10</b> Inspector: <b>KF</b> Completion Date: <b>22/10/10</b>
15 EUGENIA ROAD, LONDON, SE16 2RU	L&Q		Not LBL Owned		No records on system
FLATS 1 -38, 22 TIDEMILL WAY, DEPTFORD, LONDON, SE8 4BF	L&Q		Not LBL Owned		No records on system
34 - 66 Mandara Place, Yeoman Street, London, SE8 5ET	L&Q		Not LBL Owned		No records on system
1 - 7 Mandara Place, Yeoman Street, London, SE8 5ET	L&Q		Not LBL Owned		No records on system
Flats 1 - 161, Booth Court, Thurston Road, Lewisham, London, SE13 7GU	L&Q	Approved Inspector	Not LBL Owned		No records on system for 1-161 Booth Court
Thurston Point, Flats 1 - 56 , Orwell Court, Jerrard Street, Lewisham, London, SE13 7TA	L&Q	Approved Inspector	Not LBL Owned		No records on system for 1-56 Orwell Court
Flats 1 - 136 Swanton Court ), Jerrard Street, Lewisham, London, SE13 7HE	L&Q	Approved Inspector	Not LBL Owned		No records on system for 1-136 Swanton Court
Flats 1 - 57 Lindsay Court, Loampit Vale, London, Lewisham, SE13 7LL	L&Q	Approved Inspector	Not LBL Owned		No records on system
1-24 CROSSPOINT HOUSE, 2 WATSON'S STREET, NEW CROSS, LONDON, SE8 4DB	L&Q		Not LBL Owned		No records on system
1-10 Mill House, Elder Walk, Lewisham, London, SE13 7EN	L&Q		Not LBL Owned		No records on system
Tuscany Corte, 71 Loampit Vale SE13	L&Q	Council	Not LBL Owned		No records on system
Paris Corte, 75 Loampit Vale, SE13	L&Q	Council	Not LBL Owned		No records on system
PAMPAS COURT, 13 WATERWAY AVENUE, LONDON, SE13 7GB	L&Q	Council	Not LBL Owned		No records on system
18-32,THE ARCHES,CHILDERS STREET,ROTHERHITHE,LONDON	Optivo		Not LBL Owned		Insufficient information details to carry out search.
1-17,THE ARCHES,CHILDERS STREET,ROTHERHITHE,LONDON	Optivo		Not LBL Owned		Insufficient information details to carry out search.
30-58,NORFOLK HOUSE,BROOKMILL ROAD,DEPTFORD,LONDON	Optivo		Not LBL Owned		No record of works application or notice received.
1-29,NORFOLK HOUSE,BROOKMILL ROAD,DEPTFORD,LONDON	Optivo		Not LBL Owned		No record of works application or notice received.

Address	Provider/Landlord	Building Control	FRA	Agent/Inspector Details	Key Actions & Dates
Loampit Vale (Renaissance)	Barratt London	Council	Not LBL Owned	<b>Sayar Architectural Design &amp; Construction</b> , 12 Handsworth Road N17 6DE	Inspection Checked - No Records No Completion date - Agent Sayar Design
Cannon Wharf (Greenland Place)	Barratt London	Approved Inspector	Not LBL Owned		Insufficient information details to carry out search.
Catford Green	Barratt London	Approved Inspector	Not LBL Owned		Insufficient address details to carry out search.
Marine Wharf West	Berkeley Homes	Council	Not LBL Owned	<b>N H B C Building Control Services</b> , NHBC House, Davy House, Knowhill, Milton Keynes MK5 8FP	Last Inspection scheduled with RP 04/11/136 -Ref: 50551297 Cancellation notice received 26/01/12.
Chapter Student Living (Sherwood Court)	Greystar	Council	Not LBL Owned	HA-(1) <b>Mr Mike Jenner</b> , Floor 5 62-64 Baker Street W1U 7DF (2) <b>Brent Council Building Control</b> , Brent Civic Centre, Engineers Way, Wembley HA9 0FJ	Changed from 616 to 611 Units. Last Inspection 12/08/16 Completion 19/08/16
Seager Distillery	Galliard Homes	Approved Inspector	Not LBL Owned	<b>N H B C Building Control Services</b> , NHBC House, Davy House, Knowhill, Milton Keynes MK5 8FP	362 Residential Units & 5 Non residential units: Completion Date: 14/12/11
Block 1 Lewisham Gateway	Muse	Approved Inspector	Not LBL Owned		Insufficient information details to carry out search.
Block 2 Lewisham Gateway	Muse	Approved Inspector	Not LBL Owned		Insufficient information details to carry out search.
Block 3 Lewisham Gateway	Muse	Approved Inspector	Not LBL Owned		Insufficient information details to carry out search.
Batavia Road	Real Star Living	Council	Not LBL Owned	<b>Scialphatrack</b> Piper House, 14 West Place, West Road, Harlow, Essex CM20 2GY	Final Inspection 28/11/13 & Confirmed by LBL Officer Completion Date: 28/11/13
Deptford Rise, 123 Deptford High St	U+i	Approved Inspector	Not LBL Owned		No record of works application or notice received.
Goldsmiths College Buildings	Goldsmiths College		Not LBL Owned		Insufficient information details to carry out search.
ALASKA BUILDING	Berkeley Seventy-Six Limited	Approved Inspector	Not LBL Owned		No record of works application or notice received.
NEBRASKA BUILDING	ST JAMES HOMES LIMITED	Approved Inspector	Not LBL Owned		No record of works application or notice received.
BAQUBA BUILDING	St James Group Limited	Approved Inspector	Not LBL Owned		No record of works application or notice received.
HESTER HOUSE 72-78	ST JAMES GROUP LIMITED	Approved Inspector	Not LBL Owned		No record of works application or notice received.
COLORADO BUILDING	ST JAMES HOMES LIMITED	Approved Inspector	Not LBL Owned		No record of works application or notice received.
BOULTON HOUSE 72-78	ST JAMES GROUP LIMITED	Approved Inspector	Not LBL Owned		No record of works application or notice received.
CALIFORNIA BUILDING	Berkeley Seventy-Six Limited	Approved Inspector	Not LBL Owned		Insufficient information details to carry out search.

WASHINGTON BUILDING	ST JAMES HOMES LIMITED	Approved Inspector	Not LBL Owned	Applicant: <b>St James Group Ltd (Urban Living)</b> , Marlborough House, 298 Regents Park Road, Finchley N3 2UA Agent: <b>N H B C</b> , NHBC House, Davy House, Knowhill, Milton Keynes MK5 8FP	Last Inspection: 03/08/12 Inspector: TER Completion Date: 03/08/12
DAKOTA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		No record of works application or notice received.
MONTANA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		No record of works application or notice received.
IDAHO BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		No record of works application or notice received.
ARIZONA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		No record of works application or notice received.
NEVADA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		Nothing on the system
MADISON BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		Nothing on the system
BROOKLYN BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		Nothing on the system
HUDSON BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned	Applicant: <b>Life Residential</b> , Unit 2, Portal West Business Centre, 6 Portal Way W3 6RU Agent: <b>Thames Building Control Ltd</b> , Unit 10, Cygnus Park, Dalmeyer Road NW10 2XA	Ref: C11/13/3851 Last Inspection: 14/01/15 Inspector: TEMP Completion Date: 14/01/15
CHENLA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		Nothing on the system
ADANA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		ONLY Info on system is for Unit 3 for New Dental Practice
NARA BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		Nothing on the system
AUGUSTINE BUILDING	Berkeley/St James Homes	Approved Inspector	Not LBL Owned		Nothing on the system
INDIANA BUILDING	Berkeley Seventy-Six Limited	Approved Inspector	Not LBL Owned		No record of works application or notice received.
SIENNA ALTO	Barratts	Approved Inspector	Not LBL Owned		No record of works application or notice received.
DA VINCI TORRE	Aviva	Approved Inspector	Not LBL Owned		No record of works application or notice received.

# Agenda Item 10

<b>Chief Officer Confirmation of Report Submission</b>		
<b>Cabinet Member Confirmation of Briefing</b>		
<b>Report for: Mayor</b>		
<b>Mayor and Cabinet</b>		X
<b>Mayor and Cabinet (Contracts)</b>		
<b>Executive Director</b>		
<b>Information</b> <input type="checkbox"/>	<b>Part 1</b> <input checked="" type="checkbox"/>	<b>Part 2</b> <input type="checkbox"/>
		<b>Key Decision</b> <input type="checkbox"/>

<b>Date of Meeting</b>	15 <sup>TH</sup> November 2017	
<b>Title of Report</b>	Outcome of consultation on the proposal to remove the subsidy for meals at day centres	
<b>Originator of Report</b>	Heather Hughes	<b>Ext.43511</b>

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
<b>Financial Comments from Exec Director for Resources</b>	√	
<b>Legal Comments from the Head of Law</b>	√	
<b>Crime &amp; Disorder Implications</b>		
<b>Environmental Implications</b>		
<b>Equality Implications/Impact Assessment (as appropriate)</b>	√	
<b>Confirmed Adherence to Budget &amp; Policy Framework</b>		
<b>Risk Assessment Comments (as appropriate)</b>		
<b>Reason for Urgency (as appropriate)</b>		

Signed:  Executive Member

Date: 7<sup>TH</sup> November 2017

Signed:  Director/Head of Service

Date 7<sup>th</sup> November 2017

### Control Record by Committee Support

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	



<b>MAYOR AND CABINET</b>		
<b>Report Title</b>	Outcome of consultation on the proposal to remove the subsidy for meals at day centres	
<b>Key Decision</b>	Yes	Item No
<b>Ward(s)</b>	Borough Wide	
<b>Contributors</b>	Executive Director for Community Services	
<b>Class</b>	Part 1	Date: 15 November 2017

## 1. SUMMARY

- 1.1. This report sets out the outcomes of the consultation relating to the proposal to remove the subsidy for meals at 3 day centres, Cedar Court, Cinnamon Court and the Ladywell Centre. This was proposed at Mayor and Cabinet on the 11 February 2015 as part of the Council's savings programme under 'decision regarding charging for meals' (A14) and 'widening the scope for charging for social care' (Com 41) as a saving for 2016/17. The specific proposals regarding day centre meals would deliver a saving to the Council of £62K. Mayor and Cabinet asked that the impact of these proposals be consulted on and reported back. There was a delay on beginning the consultation because of the risk of confusion with the other wider day centre consultations and changes taking place at that time.
- 1.2. The contract for the delivery of meals to day centres was part of a bigger contract for the delivery of 'meals on wheels'. This was a shared contract with Lambeth and Southwark held by Apetito. That contract expired on 7th August 2016. The agreement to continue a subsidy was extended by the Executive Director for Community Services due the wider considerations at the time, and alternative interim meals arrangements were out in place. Housing and Care 21 extended their internal contracted meals service to Cinnamon Court and Cedar Court; Apetito continued to deliver meals to the Ladywell Centre. The current arrangement ends on the 31<sup>st</sup> December 2017.
- 1.3. The consultation on the removal of the subsidy for meals at day centres took place between the 5<sup>th</sup> September and 14th October 2017. This report sets out the consultation process and the responses received by the Council. The consultation proposed the continuation of a hot meals service at the centres on a full cost recovery of about £6 a meal or whether service users would prefer a 'bring your own' option.
- 1.4. The majority of service users (78% of the returned questionnaires) expressed a preference to continue a hot meals option, though were concerned about the increase in cost. This preference was also reflected in the meetings with service users. The key recommendation of this consultation is therefore that hot meals services should continue at the three centres but at full cost recovery.
- 1.5. The report was considered by Healthier Communities Select Committee at its meeting of 1<sup>st</sup> November 2017. No specific comment or recommendation was made.

## 2. RECOMMENDATIONS

The Mayor is recommended to:-

- 2.1 approve the removal of the subsidy currently paid for the meals service at three day centres Cinnamon Court, Cedar Court & the Ladywell Day Centre and that full cost recovery for meals for those meals apply.
- 2.2 approve that the subsidy be extended for a further month to the 31<sup>st</sup> January 2018 at a cost of £5,195.
- 2.3 agree that the delivery of a meals offer become part of its directly managed day service provision at the Ladywell Centre.
- 2.4 agree a £9.8K capital allocation for the purchase of new kitchen equipment.

## 3. POLICY CONTEXT

- 3.1 The function of Adult Social Care is to ensure that people eligible for support receive services appropriate to their needs within the framework of statutory duties and agreed policies. This is determined through the completion of an assessment in accordance with the Care Act 2014, followed by the application of the appropriate eligibility criteria and support decisions.
- 3.2 The Care Act 2014 is the single most substantial piece of legislation relating to adult social care to be implemented since 1948. It has taken previous legislation, common law decisions and other good practice guidance and consolidated them. The Care Act places a wide emphasis on prevention, the provision of advice and information, changes to eligibility, funding reform and market shaping and commissioning.
- 3.3 The Care Act requires the Council to engage with providers and local communities when redesigning services and planning for the future, as well as ensure that active engagement and consultation with local people is built into the development and review of their strategies for market shaping and commissioning.
- 3.4 The final report of the Local Government Association's Adult Social Care Efficiency (ASCE) Programme published in July 2014, sets out a number of initiatives that Councils across the country have put in place to deliver services that will meet the requirements of the Care Act in the current financial climate. It sets out advice on how to agree a new contract with citizens and communities, managing demand, transforming services, improving commissioning and developing more integrated services.
- 3.5 The contents of this report are consistent with the Council's policy framework. It supports the following goals outlined in Lewisham's Sustainable Community Strategy 2008-2020:

**Healthy, active and enjoyable** – where people can actively participate in maintaining and improving their health and well-being.

**Ambitious and achieving:** where people are inspired and supported to fulfil their potential.

**Empowered and responsible:** where people can be actively involved in their local area and contribute to tolerant, caring and supportive local communities.

- 3.6 The proposed recommendations in the report also meet with the Council's following corporate priority:

**Caring for Adults and Older People:** working with health services to support older people and adults in need of care.

- 3.7 This consultation is governed by the Council's revised (2017 Best Value Guidance, which states that "to achieve the right balance – and before deciding how to fulfil their Best Value Duty – authorities are under a Duty to Consult representatives of a wide range of local persons including representatives of council tax payers, those who use or are likely to use services provided by the authority, and those appearing to the authority to have an interest in any area within which the authority carries out functions. This should apply at all stages of the commissioning cycle, including when considering the decommissioning of services."

#### **4. BACKGROUND**

- 4.1 Councils throughout the UK are currently under severe financial pressure. By the year 2019/20, savings worth a further £45 million need to be made across Lewisham Council. With this in mind, the Council has been thinking about the best ways to make savings and reduce costs, whilst continuing to deliver a quality service and protect those who are most vulnerable.
- 4.2 As one part of this work, the Council has been looking to close the gap between what service users pay for a meal and the actual cost of providing that meal. This was proposed as one of a number of savings at Mayor and Cabinet on the 11 February 2015. The proposal was part of the Council's wider savings programme under to 'decision regarding charging for meals' (A14) and 'widening the scope for charging for social care' (Com 41). There has been no increase to the cost of meals for a number of years.
- 4.3 The Council held a 'cost and volume' contract for the provision of a hot meal service 7 days a week, 52 weeks a year with Apetito. This was a partnership contract with Southwark and Lambeth Councils and ended on 7<sup>th</sup> August 2016. For all three Councils, numbers of clients assessed as requiring a hot meals service had been steadily declining over the life of the contract. It was envisaged that there would be further reductions in numbers as Lewisham and other Councils moved to asset based assessments as required by the Care Act (2014). The cost of meals was escalating as take up decreased, therefore the contract was increasingly not cost effective and would not be re-procured.
- 4.4 Three day centres in the borough, the Ladywell Centre managed directly by the Council, and Cinnamon Court and Cedar Court Day Centres managed by Housing and Care 21 were in receipt of subsidised meals as part of the Apetito contract. Other day centres/ services not linked with the Apetito contract had addressed the issue of meals provision without subsidy several years earlier, or indeed had never had a meals subsidy. The inclusion of these specific three centres in the Apetito contract had protected them from earlier consideration of removal of the meals subsidy and alternatives being put in place.
- 4.5 One hundred and twenty one individuals receive hot meals across the three day centres and would therefore be directly affected by any change to the subsidy: 67 in total across Cinnamon Court and Cedar Court and 54 at Ladywell. The majority are

older adults, some of whom, particularly at the Ladywell centre, also have a diagnosis of dementia. There is also a small number of adults with physical disabilities and a small number of adults with a learning disability.

- 4.6 The ending of the Apetito contract presented a different requirement from a straightforward individual, asset based, assessment process, as at day centres people are by definition in groups and away from home. Therefore, a more formal consultation process was required.
- 4.7 Usually a consultation would be run in parallel with, and completed in time for, the end of a contract. However, when the Apetito contract was ending in August 2016, the Council had just come to the end of a significant consultation and reorganisation of its directly managed services which affected many of the same service users at Ladywell, Cinnamon Court and Cedar Court. There were concerns raised that competing and additional changes and consultations might cause unnecessary stress and confusion to those service users. Consequently, in July 2016, the Executive Director for Community Services agreed to continue the subsidy for lunchtime meals at day centres as follows:
- a variation to the Apetito contract and continuation of the subsidy to 31<sup>st</sup> December 2017 for service users at the Ladywell Centre
  - the continuation of a meals subsidy to 31<sup>st</sup> December 2017 for service users at Cinnamon Court and Cedar Court to be paid to Housing and Care 21s commissioned meals provider
- 4.8 Other variables which delayed formal consultation proceeding during that period included an unexpected general election and an associated period of purdah.

## **5. THE CONSULTATION PROPOSAL**

- 5.1 The Council consulted on the following proposal:

Lunchtime meals are currently available at the day centre you attend. These meals are subsidised by the Council, which means that you do not pay the full cost of the meal. The actual cost of the meal to the Council is higher than the amount you pay for it.

At the moment you are asked to pay £3.50 towards your meal. The additional amount that the Council pays towards your meal varies between £2.50 and £4.32 a meal – this is the Council subsidy.

We are proposing that the current subsidies for lunchtime meals at Cinnamon Court, Cedar Court and the Ladywell Centre be removed. Going forwards, we are considering the following two options:

- Continue to provide hot meals at lunchtime. However, you would be asked to pay the full cost of this meal at a flat rate of approximately £6 per meal  
OR
- Provide a 'bring your own' option where you can bring food and drink from home to the day centre

As part of the consultation people were also asked to comment on the impact of the proposals and how this might be mitigated against.

## **Process and Activity of Consultation**

- 5.2 The consultation took place over a 5 week period from 5 September 2017 to 14 October 2017.
- 5.3 The consultation pack was sent to the 121 directly affected service users with a covering letter. Freepost envelopes were provided to enable return of completed feedback sheets. The consultation pack was made available in different languages, if requested.
- 5.4 The consultation was posted on Lewisham Council's website so that the form could be completed on line.
- 5.5 A link to the consultation website was sent by email to local voluntary and community organisations likely to have an interest in the proposals including Age UK, Pensioners Forum, Carers Lewisham, Mind Care, Seniors, & Voluntary Action Lewisham.
- 5.6 Six meetings (two at each centre) were held so that people and their families had an opportunity to talk directly to officers.

## **Consultation Outcomes**

- 5.7 Full detail of the consultation responses from the meetings and from the questionnaires can be found in appendices 1 and 2.
- 5.8 Of the one hundred and twenty one questionnaires sent directly to service users, twenty one questionnaires (19%) were returned. One questionnaire was completed on line. A total of 58 service users and 25 staff attended the 6 meetings held at the three affected day centres. No submission was received from the third sector organisations contacted.
- 5.9 Officers recognise that this proposal was difficult for people to engage with, and recognise that many of the service users strongly held a preference for no change. Officers would like to thank everyone for giving up their time to attend the meetings and to complete the questionnaires and for their contributions to this consultation process.
- 5.10 The following tables summarise the main comments made both at meetings and in written submissions as part of the consultation process. They do not contain every comment and officers recognise that the format carries a risk of masking the impact of the points being made. However, officers believe that the content is a true reflection of the key points raised and the sentiments with which they were expressed.

<b>General comments about the savings and the process</b>	
<b>Comment</b>	<b>Officer Response</b>
The Council is targeting the most vulnerable and lowest income members of the community and this is causing anxiety and distress	Officers understand that all adults eligible for and in receipt of services are likely to be affected by the government's reduction in its spending on council services generally, and adult social care services in particular.
It already costs more to care for someone with a disability	Officers recognise that some people with a disability may have additional daily living costs and the extent to which this may be the case is reflected in the benefits that people receive.
Relatives manage money for some individuals and should be asked for feedback	Relatives had an opportunity to respond to the consultation either through the Council website, though attending the meetings, or by completing a paper questionnaire
Family carers may have to provide both a packed lunch and also a more substantial meal in the evening. This would have a big impact on people who care for their relative at home.	Officers understand the valuable role that families play in supporting people to maintain their independence at home. Officers will work with providers to take into account individual circumstances where this may be a specific issue depending on the outcome of the consultation.

<b>Continue to provide hot meals at lunchtime at £6 per meal</b>	
<b>Comment</b>	<b>Officer Response</b>
Would be willing to pay more if meals were more varied and better quality	Officers note that some people are dissatisfied with the quality of meals currently and would expect there to be closer discussion and involvement with service users about menu planning and meal availability if a hot meals option was retained
Would pay the increase	Officer note that 18 of the 22 questionnaires received (78%) suggest that people would prefer a hot meals service at an increased cost in preference to no hot meals service
We can't afford the increase	People attending other day services pay for the full cost of their meal. Also, the Council has not increased the client contribution to meals for several years.
An increase would have an impact on ability to pay other bills	Officers note that the increase would affect people's overall disposable income
A cooked meal is the only reason some people attend the centre	Officers understand the importance of a hot meal offer as part of the wider day services offer.
If no meals were available then there may need to be a reassessment/ review of the current care package and how it is used	Officers recognise the importance of a hot meal to people attending day services. However, the key needs met by day services are respite and/or socialisation. Officers note that some people may wish to reconsider how their care package/ personal budget is allocated
It is similar to what I pay at another centre.	Officers note that some service users pay differential costs relating to a subsidy/ the absence of a subsidy at other day service locations.

<b>Provide a 'bring your own' option where you can bring food and drink from home to the day centre</b>	
<b>Comment</b>	<b>Officer Response</b>
Some service users are not able to cook a meal & take a packed lunch because their physical and/or mental disability does not allow this and they do not have a carer to do this for them	Officers note that this may be a particular difficulty for service users living alone with no other support system. This relates to very few people currently receiving meals at the centre. A hot meals option would be the preferred offer to support this group, and take up will be monitored on a case by case basis through the implementation period if the proposal is agreed.
Would take a packed lunch/ already take a packed lunch	Officers note that some people are already bringing their own lunch, or would be happy to bring their own lunch in future
A packed lunch would not be suitable for people who need 'soft' food or who have difficulty chewing or swallowing	Officers know that a soft or pureed meals offer is a requirement for some people's health conditions. Some people already bring prepared pureed hot food to the centre in food flasks. A hot meals option would better support pureeing of food.
The Council could partner with a supermarket offering a £3 meal deal	Officers do not believe that the Council could do this without incurring additional cost in either staff time or delivery costs which would increase the cost of sandwiches.
Concern that food brought in by service users would not be nutritious	Officers recognise staff concerns about the nutritional quality of food that might be brought in by service users and that therefore a hot meals offer would be the better option.

<b>Whether the changes would stop you from attending the day centre</b>	
<b>Comment</b>	<b>Officer Response</b>
Three questionnaires returned said that people would stop attending and two said that they might. The majority (74%) of questionnaires returned said that they would continue to attend and this was also the sense of the 6 meetings.	The officers note that the majority of people intend to continue to attend the centre. However, officers will monitor attendance in the first quarter of implementation and follow up anyone who unexpectedly stops attending.

<b>What the Council might be able to do in mitigation</b>	
<b>Comment</b>	<b>Officer Response</b>
Stop the change and continue to provide hot meals	The decision to proceed or not with removing the subsidy will be considered by Mayor and Cabinet on the 15 <sup>th</sup> November.
Restrict menu choices	Officers do not believe that this is a possibility due to the varied needs of the service users attending the centres, and because some service users are already concerned about the choice and quality of meals available.

<b>Other cost effective meals options the Council should consider</b>	
<b>Comment</b>	<b>Officer Response</b>
Cut top bosses pay	Public sector pay has been restrained for a number of years. Some Council officers have already moved to part time working
Provide hot meals only 3 days a week rather than 5	Officers do not believe that this is a possible option as different service users attend the centres on different days.
Buy from Iceland and provide microwave ovens	A cook from frozen option might be an option for people who could manage a microwave oven. Cook from frozen prepared at the centre would require staff time to prepare.

- 5.11 Overall, the outcomes of the consultation suggested that there was a mix of preferences to the proposals, but that the majority of the respondents showed preference to pay the full cost of a hot meal, with 4 people (18 people = 17%) expressing a preference to bring their own lunch. The majority (75%) of people who responded to the questionnaires said that the proposed changes would not prevent them from continuing to attend the day centre. Respondents expressed a preference for a hot meals offer to continue to be available, though some would also like the flexibility of bringing a sandwich or a microwave meal to heat on site.

## **6. RESPONSE TO THE CONSULTATION**

- 6.1 This section considers areas of specific concern by each proposal and sets out officers' responses and assurances about what actions will be put in place so as to meet or minimise those concerns.

### **Continue to provide hot meals at lunchtime at a flat rate of approximately £6.**

- 6.2 People have highlighted a preference for the continued provision of a hot meals offer at the Centres. However, they are concerned about the increased cost.  
**Response** – Officers will work with Housing and Care 21 to ensure that they deliver a high quality hot meals option at Cinnamon Court and Cedar Court. Officers have also been in discussion with the Council's direct service provider at the Ladywell Centre who have expressed an interest in incorporating a meals provision into their wider service offer when the current contract with Apetito ends. Officers have included this as a recommendation to Mayor and Cabinet. Officers will ensure that the provision of soft/ pureed meals and ethnic appropriate meals options are available as required at the three centres and will work with day service providers to monitor the impact of the removal of subsidy on take up of meals and general health and wellbeing. The rate of £6 was included in the consultation as the estimated actual cost of meals delivery including staff and food. Officers will keep the cost of meals under review and ensure that they reflect the actual cost of the provision.

### **Provide a 'bring your own' food and drink option**

- 6.3 Officers are mindful that some people already take their own lunch to the centres and that some others would like to consider this option in preference to a hot meals option. **Response** - Officers will work with Housing and Care 21 and the Council's directly managed service to ensure that there is space available for people to keep their food safely. Officers will also work with both day service providers to risk



assess the presence and usability of micro wave ovens or similar for people who would prefer to bring their own meal in to heat independently. Officers will also explore options with both providers for sandwiches to be available for sale in each of the three day centres.

### **General comments**

- 6.4 Officers note the comments about affordability and the increase in cost. **Response** – The current subsidy is due to end on the 31<sup>st</sup> December. This will allow only a short period of notice for service users and their families. It also means that the increased cost will start from the 2<sup>nd</sup> January 2018. Many people already experience financial difficulty in the first month of January due to Christmas spending. Officers will therefore propose that the subsidy is extended to 31<sup>st</sup> January 2018 to allow service users and their families a longer lead in time.

## **7. IMPLICATIONS OF THE PROPOSALS**

- 7.1 The Council's direct provider of day service at Ladywell have expressed an interest in delivering a hot meals service at the centre following the termination of the Apetito contract. They advise that this would give them control over the quality and choice of food, encourage longer term development of the centre as a wider community offer, and support opportunities for further partnership working with third sector providers, including the possibilities for future supported employment opportunities. Officers have assessed the cost of this as being cost neutral to the Council with a cost of meal being in the region of £5.60 (Appendix 3) and therefore within the consultation guide price.
- 7.2 As stated above, the reduction of meals numbers has resulted in the cost of individual meals purchased from Apetito increasing. If Apetito were to continue to provide meals at the Ladywell Centre, this would represent an increasing financial risk to the Council if the subsidy were not removed or to service users if it were. Officers therefore recommend that the contract extension with Apetito is formally ended. The formal ending of the Apetito contract will result in one of their employees being put at risk. Apetito has written to advise that in the circumstances that the contract stops completely they would require the Council to underwrite the cost of that member of staff's redundancy or give an additional 3 month notice.
- 7.3 If Mayor and Cabinet agree the development of a directly managed hot meals offer at Ladywell as part of their wider direct provision offer, then that member of staff is likely to be eligible for TUPE transfer to the Council. Informal due diligence discussions do not suggest that this would present a financial risk to the Council. Any matters arising from implementation of the proposals will be addressed through the Council's Code of Practice Relating to Employment.
- 7.4 Housing & Care 21 accepted responsibility for meals delivery at Cinnamon and Cedar Courts when the original Apetito contract ended in August 2016. They subsequently extended their contract with their own contracted meals provider. Housing & Care 21 have stated as part of contract monitoring that they will support the Council to maintain delivery of a hot meals service and/ or a packed lunch offer as may be required by the Council as an outcome of this consultation.
- 7.5 Healthier Communities Select Committee at its meeting on 1<sup>st</sup> November 2017 recognised the financial pressures on the Council leading to the proposal as set out in this paper. However, the Committee reinforced the need for officers and

providers to be alert to the possible impacts of the proposals on both continued attendance and general nutrition and hydration. Officers undertook to monitor any impact through the first three months of implementation and until the change had settled and any impact understood.

## 8. FINANCIAL IMPLICATIONS

- 8.1 This report recommends that the Council discontinue the payment of a subsidy for hot meals in three day centres, Cinnamon Court, Cedar Court and the Ladywell Centre. This recommendation would generate £62K in savings.

	<b>Annual Cost less Client Charge</b>
<b>Cedar Court</b>	
89 lunches @ £2.50 weekly subsidy	£11,570.00
<b>Cinnamon Court</b>	
70 lunches @ £2.50 weekly subsidy	£9,100.00
<b>Ladywell Centre</b>	
459 lunches monthly (various subsidies)	£41,239.08
<b>TOTAL ANNUAL SUBSIDY</b>	<b>£61,909.08</b>

- 8.2 The report further outlines a proposal that the responsibility for delivering hot meals at the Ladywell Centre become part of the Council's directly managed service offer at the Centre. To achieve this, the service would require the purchase of some new equipment at a cost of £9.6K. Financial modelling shows that a meals offer could be delivered cost neutral to the Council at a full cost recovery of £5.60 a meal, including depreciation on the equipment (Appendix 3).
- 8.3 Should recommendation 2.3 be agreed as per paragraph 8.2 above, TUPE would be likely to apply to the one member of staff employed by Apetito. While formal due diligence processes cannot be undertaken prior to a decision being made, informal knowledge of the terms and conditions of the post holder suggests that this can be contained within the general financial modelling.

## 9. LEGAL IMPLICATIONS

- 9.1 The Council has a responsibility to provide care and support services for those with assessed eligible need pursuant to the Care Act 2014. The Council may also charge for these services, in accordance with any charging policy or decision as may be applicable at any time, subject to statutory guidance.
- 9.2 The Council also has a legal duty to set and pursue a balanced budget in any financial year, and address any issues relating to budget pressures or overspending in a robust manner in order to fulfil its fiduciary duties in the administration of public funds.
- 9.3 When service changes are called for, the Council has a duty to consult those affected, interested parties, and any other interested bodies, providing sufficient information in an accessible manner so as to allow for informed, timely response, and taking into account in its decision making the outcome of such consultation.

- 9.4 In the event that Mayor and Cabinet agree recommendation 2.5, to extend the directly managed service to include a hot meals offer, then TUPE is likely to apply to a member of staff currently employed by Apetito. In that eventuality the Council will undertake consultation and due diligence processes in line with the Council's TUPE transfer guidance and statutory requirements.
- 9.5 The Equalities Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In summary the Council must, in the exercise of its functions, have due regards to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act.
  - Advance equality of opportunity between people who share a protected characteristic and those who do not.
  - Foster good relations between people who share a protected characteristic and those who do not.
- 9.6 The duty continues to be a “has regard” duty, and the weight to be attached to it is a matter for the Mayor to decide, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 9.7 The Equality and Human Rights Commission (EHRC) has issued “Technical Guidance on the Public Sector Equality Duty” and statutory guidance the “Equality Act 2010: Services and Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to chapter 11 which deals in particular with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The Statutory Code and the Technical Guidance can be found at:
- [www.equalityhumanrights.com/legal\\_and\\_policy/equality-act-codes-of-practice-and-technical-guidance/](http://www.equalityhumanrights.com/legal_and_policy/equality-act-codes-of-practice-and-technical-guidance/)
- 9.8 The EHRC has previously issued five guides for public authorities in England giving advice on the duty:
- The essential guide to the public sector equality duty
  - Meeting the equality duty in policy and decision making
  - Engagement and the equality duty
  - Equality objectives and the equality duty
  - Equality information and the equality duty
- 9.9 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duty and who they apply to. It covers what public authorities should do to meet the duty, including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

## **10. EQUALITIES IMPLICATIONS**

- 10.1 An Equalities Analysis Assessment (EAA) has been completed (Appendix 4). This identifies that the groups directly affected by these proposals are predominantly older adults, who are likely to have additional disabilities or health conditions and who are predominantly women. This reflects the social care reason why service users are attending the day services and reflect the relative gender mix of the population.
- 10.2 The breakdown of ethnicity and what is known about religion and beliefs from the meals purchased evidences that there is a need for culturally appropriate (halal and Afro-Caribbean) meals to continue to be available so that these groups were not disadvantaged.
- 10.3 Analysis of individual service users' marital status prompted further consideration of whether they live alone in case this presented a different equalities issue which could be considered as mitigation regarding the proposals. No one lives alone who uses the Ladywell Centre and therefore there are people in the immediate environment who can support them. Approximately half of the service users at the Cinnamon Court Day Centre and approximately one third of the service users at Cedar Court Day Centre live alone: however, of that number a significant proportion live in the Extra Care provision where the Day Centres are sited and so again there is a support structure available.
- 10.4 There are no specific equalities considerations relating to the other protected characteristics of marriage and civil partnerships, pregnancy and maternity, sexual orientation or gender reassignment.
- 10.5 A small number of the returned questionnaires suggested that people would stop attending the centre should the proposals be agreed. Officers will monitor whether this occurs and will mitigate against any detriment to respite or socialisation needs on an individual basis by supporting people to meet those needs differently within their Personal Budget.

## **11. ENVIRONMENTAL IMPLICATIONS**

- 11.1 There are no specific environmental implications arising from this report

## **12. CRIME REDUCTION IMPLICATIONS**

- 12.1 There are no specific crime reduction implications arising from this report

## **13. SUMMARY AND CONCLUSIONS**

- 13.1 This report contains the outcome of a consultation on the Council removing its subsidy for the provision of hot meals at Cinnamon Court, Cedar Court and the Ladywell Centre. The consultation focussed on two options: paying the full cost of a

hot meal at approximately £6 a meal provided at the Centre; or bringing a packed lunch to the centre.

- 13.2 An analysis of the comments provided to the 6 consultation meetings and of the completed consultation questionnaires suggest that retaining the facility for a hot meals service on a full cost recovery model was the preferred option. It was noted though that some service users might want to consider bringing their own packed lunch.
- 13.3 The cost of maintaining a meals offer with further reductions in take up at Ladywell via a further contract with Apetito would present a financial risk to either the council of a higher subsidy or to service users on a full cost recovery model. This report therefore recommends that the directly managed day service provider based at the Ladywell Centre extend their offer to include a hot meals service.
- 13.4 Council officers will continue to work with both Housing and Care 21 and the Council's directly managed day service provider at Ladywell to implement the change in hot meals delivery and will closely monitor the impact of this change on the welfare and attendance of individual service users. Any service user identified where there may be a risk to welfare will be reviewed/ reassessed as necessary.
- 13.5 Should Mayor and cabinet agree these proposals, no action will be taken until Business Scrutiny Panel on 28th November 2017.
- 13.6 Should Mayor and Cabinet agree to the recommendations, the subsidy will be removed as of 1<sup>st</sup> February 2018. The intention is for the delivery of a directly managed meals offer at Ladywell will begin on 2nd January 2018, subject to TUPE due diligence.

### Background documents

Short Title of Document	Date	Location	Contact
Lewisham Future Programme, 2015/16 Revenue Budget Savings Report	15.02.2015	<a href="http://councilmeetings.lewisham.gov.uk/documents/g3500/Public%20reports%20pack%2011th-Feb-2015%2018.00%20Mayor%20and%20Cabinet.pdf?T=10">http://councilmeetings.lewisham.gov.uk/documents/g3500/Public%20reports%20pack%2011th-Feb-2015%2018.00%20Mayor%20and%20Cabinet.pdf?T=10</a>  Item 137	Executive Director Resources & Regeneration

If you would like any further information on this report please contact Heather Hughes, Joint Commissioning Lead for Complex Care and Learning Disabilities on 020 8314 3511 or

Corinne Moccarme, Joint Commissioning Lead for Community Support and Care 020 8314 3342.

## Appendix 1

### Detailed Analysis of the Consultation process outcomes

The consultation period ran from 5<sup>th</sup> September – 14<sup>th</sup> October 2017. Throughout this consultation period, numerous steps were taken to involve and inform those likely to be affected by the changes to the arrangements, including service users, carers, families and organisations representing adult & older people.

Below is a list of the methods used to provide information about the proposals and the opportunities in which people were given to have their say:

- Letters to service users
- Website information
- Facilitated meetings at all day centres (listed below)

<b>List of Consultations</b>			
<b>Date</b>	<b>Location</b>	<b>Number of Users</b>	<b>Carers/Staff</b>
13 <sup>th</sup> Sept	Ladywell	4	8
26 <sup>th</sup> Sept		1	3
15 <sup>th</sup> September	Cinnamon	10	3
28 <sup>th</sup> Sept	Court	11	3
15 <sup>th</sup> Sept	Cedar Court	20	4
28 <sup>th</sup> Sept		12	4

All meetings were informed of the reason for the consultation. Participants were informed that at this stage it is only a proposal and views need to be heard and feedback to Mayor and Cabinet before a decision is made. The Mayor and Cabinet meeting is on 15<sup>th</sup> November and the decision will be communicated to the Centres.

#### 1 Ladywell Centre

A number of comments were made at the **Ladywell Day Centre**

- Vulnerable, lower paid, disabled people were being targeted
- People will not be able to afford a meal
- Meals are disgusting as they do not have jacket potato or salad
- Carer said it was only cooked food for the day and often the only reason why they come to the day centre
- Co-ordinator worried about the food that is taken in by users
- Husband attends day centre three times weekly, has pureed meals but would not be able to afford the increase
- One mentioned that he can't eat hard food and the food had to be processed
- Increase would have an impact as other bills have to be paid
- Find it difficult to prepare meals
- Soft diet required and important to health
- Would need assessment if price went up
- Husband not well, coming to the day centre gives husband a break
- It gives respite

- Enjoy coming to the day centre and would find it very difficult
- All dementia clients have meals at the day centre and relies on the day centre for their only hot meal of the day
- One user depends on relatives financially as son gives set amount of money
- No meal at the day centre would mean added pressure on the carer
- One said she enjoyed the meals especially the curry
- Another depends on relatives and if money is not left then packed lunch would be brought

A relative of a service user attended and said that her sister attends the Ladywell Day Centre four times a week. However her sister attended Leemore Day Centre where meals had already stopped. As a result her sister is now used to having packed lunch and continues to have packed lunches at the Ladywell Day Centre. She then left the meeting. This user requires a puréed diet which the Family prepare for her in the mornings.

Staff mentioned that some of the packed lunches taken in by users are lacking in nutrients. It was also mentioned that it would also impact on health and well-being. A member of staff said that she can clearly recall someone who stopped eating (lunches provided) as meal prices increased. A member of staff said that (as far as she recalls) the level of client's contribution has not increased for over 6 years.

### **Specific Reduction in Subsidy Questions**

#### **Would the proposed changes described in this consultation stop you from attending the day centres in the future?**

- Most clients who attended the consultation said that they would still attend the day centre. It was also mentioned that for many service users it was the only cooked meal of the day especially for those with dementia and often the only reason they attended the day centre.
- *Response 'the proposal is that hot meals would still be available but it would be more expensive'*
- Others mentioned the proposal was targeting the low paid, disabled and vulnerable.
- A few individuals mentioned that they would not be able to afford it, already paying for transport & care package
- Others mentioned that no meals at day centre would mean added pressure on the carer
- One individual mentioned that because of her epilepsy she was unable to cook at home and the meals were very important
- A few mentioned that they would bring a packed lunch.
- Carers would have to stay longer at additional cost to prepare meals for clients, if no meal at the day centre, an assessment would be required
- Some complaint about the menu that they are currently receiving.
- *Response 'it is likely that the new arrangement would give individuals more say regarding the menu. The initial price would not be more than £6'*

It was also said by one of the carers that if service users did not receive a balanced diet their health will suffer and this will have a knock on effect on users.



**Given that you would be impacted by these proposed changes, is there anything that the Council could do to reduce any concerns you might have?**

- It was difficult to communicate this question as they were all concerned about the increase than other reductions that could be found.
- What was requested by a relative was the exact price, timeline and prices to be guaranteed for a long period.
- Some users spoke about the fact that attending the day centre gives the carer a respite break. Another mentioned how wonderful the day centre is.

**Do you have any other cost effective ideas for day centre meals that the Council should consider?**

- Individuals did not mention any other cost effective ideas. As above they were most engrossed in talking about how they would be affected and the issues that they are currently experiencing.
- Ladywell user group includes very intensive complex needs. As a result a number of service users have 1:1 carers. Some meals are also pureed or a soft diet.
- A relative mentioned that it should be means tested as it is already costing a lot to care for someone with a disability, as they are already paying for incontinence pads etc. She also mentioned that she was unable to give advice without the necessary figures.

## **2 Housing & Care 21**

Cinnamon & Cedar Courts users were asked similar questions, however the user groups appeared more able to answer questions and the disabilities were not as severe as those at the Ladywell Day Centre.

**Would the proposed changes described in this consultation stop you from attending the day centres in the future?**

### **Cinnamon Court Feedback**

- one service user said that she attends only one day per week and already pays £5 for lunch at the Calabash Centre and it would be reasonable
- Willing to pay more if the meals were better, could also take a sandwich
- Another user who attends 2 days per week said she would probably pay the increase but would also consider packed lunches
- Another two users said that relatives would have to decide
- Another user who attends 3 days per week said that she would pay the extra to keep the hot meals
- Most people felt that they wouldn't have a problem paying the extra cost
- One said that she would not be able to afford it
- If packed lunch was the only option, it would mean more work for the Carer.
- Another client who attends 5 days said he will not move. The day centre manager thinks he will not have a problem paying the extra cost.

## **Cedar Court Feedback**

Some service users mentioned that they would still attend the day centre

- One mentioned that she will bring own lunch, willing to pay if meals are better
- One service user who attends daily mentioned that it would be too expensive.
- Two service users would have to talk to family members
- Another two service users mentioned that they are quite happy to pay more
- Another two said that they would take a pack lunch
- Soft diet required
- One user said that she would consider paying for 2 meals but would also consider a packed lunch

The staff expressed health & safety concerns if they were to heat meals and due to staffing issues would find it quite challenging to assist everyone with meals. It appeared as if the majority of clients would still attend the day centre even if the cost was increased. The staff were asked on the importance of hot meals to clients and was informed that in addition to the nutritional value the meals provided an important social gathering for the clients.

### **Given that you would be impacted by these proposed changes, is there anything that the Council could do to reduce any concerns you might have?**

- One service user mentioned that keeping people local could assist as she lived next to one of the Centres and now transferred to another centre where she has to be transported to.

### **Do you have any other cost effective ideas for day centre meals that the Council should consider?**

- This question was difficult to respond to by users. Limited discussions were had at the events about this question. The first question evoked the discussions but little was said on questions 2 and 3.

## Appendix 2 Analysis of Questionnaires received

There were a total of 121 questionnaires that were sent to service users of the Ladywell, Cinnamon & Cedar Courts. The questionnaire was also available on line. The following table breaks down responses received.

Questionnaire	Responses	% of questionnaires returned	% of all service users
		Base = 23	Base = 121
<b>Number of responses</b>	23		19%
<b>Service Users/representative</b>			
A service user	13	57%	11%
A friend or family member of a service user	7	30%	5%
An advocate for a service user	2	9%	2%
other	1	4%	1%
<b>Options</b>			
• Paying the full cost	18	78%	15%
• Bring your own lunch	4	17%	3%
• Cannot afford it	1	4%	1%
Would change stop you from attending?			
No	17	74%	14%
yes	3	13%	2%
Possibly	2	9%	2%
No response	1	4%	1%
What could Council do to reduce concerns?	Continue to provide hot meals stop the proposed change restrict menu choices provide a decent meal		
Any other cost effective ideas	Cut top bosses pay Sandwiches, do hot meals only 3 days, provide more microwave ovens, buy from Iceland, ask for advice & input, Salvation Army, ask parents to Volunteer		
<b>Age</b>			
0 – 64	4	17%	3%
65 – 84	13	57%	11%
85+	5	22%	4%

No response	1	4%	1%
<b>Gender</b>			
Male	7	30%	6%
Female	16	70%	13%
Not say			
<b>Ethnicity</b>			
White	15	65%	12%
Asian/Asian British	1	4%	1%
Black/African/Caribbean/Black British	7	30%	6%
Mixed/Multiple ethnic groups			
Not say			

**Appendix 3**  
**Financial Modelling**  
**In-house Ladywell Day Centre Hot Meals Provision**

**Labour and meals costs**

180 meals sold a week. Basic cost of pre-cooked 2 course meal = **£3.50** (17/18 prices)

Substantive cook @ 20 hours a week (4 hours x 5 days) @ SCP 18 inc on costs £15,529 (£27,953 / 36 hours x 20 hours). Substantive staff cost for meal = £15,529

Holiday Cover (agency) costs @ £17.65 an hour for 20 hours x 4 weeks = £ 1,412

Total Labour cost = £16,941

Cost per meal for labour = £16,941/ 50 working weeks/ 180 meals a week = **£1.88** a meal.

Depreciation cost of equipment = £9,800/ 5 years/ 50 working weeks/ 180 meals a week = **22p**

**Total cost of meal = £3.50 + £1.88 + £0.22 = £5.60 a meal**

Other costs such as services and management overheads are minimal and contained within the existing running costs of the centre.

**Set up Capital Costs**

Equipment	Unit Cost (Net)	Overall Cost (Net)
5 x Industrial Microwaves	£200	£1,000
2 x Dishwasher	£1,100	£2,200
2 x Heated Trolleys	£1,800	£3,600
Kitchen Clearance	£3,000	£3,000
	<b>Total Cost</b>	<b>£ 9,800</b>

## **1.0 Introduction**

- 1.1 Lewisham Council has worked to increase choice, rights and inclusion for people with social care needs in line with government policy and legislation. This has been achieved through a range of approaches including the introduction of personal budgets and redesign of services.
- 1.2 Lewisham currently provides subsidised meals at Cinnamon and Cedar Courts (Housing & Care 21) and Ladywell Day Centres and the proposal is to remove the payment of subsidies paid for meals or bring a packed lunch to the day centre.
- 1.3 The people who will be affected are users of the Ladywell Day Centre, Cinnamon- and Cedar- Courts Day Centres.
- 1.4 This Equalities Impact Assessment has been undertaken to identify the impact of the reduction of the meals subsidy from the protected characteristics group.
- 1.5 Full regard has been had to the requirements of the Equalities Act 2010 and proper regard has been had to the nature and extent of the duties owed by it.
- 1.6 The EIA determines the likely implications of the changes and assesses whether or not the changes will disadvantage some groups or individuals more than others. The EIA addressed the following questions:
  - Could the proposed changes affect some groups differently?
  - Would the proposed changes disproportionately affect some groups more than others?
  - Would the proposed changes promote equal opportunities?
- 1.7 Affected service users were consulted between 5th September 2017 – 14th October 2017 and relatives were able to express their views on the proposals.
- 1.8 Other agencies who may have an interest in the changes, and members of the general public were able to comment should they so wish through the Council's on line portal

## **2.0 Assessment of Impact**

- 2.1 The tables below summarise the likely impact of the proposals to stop the subsidy to the cooked meals service on the specific service users at Cinnamon Court, Cedar Court and Ladywell day centre reflecting the protected characteristics of the people attending, highlighting where there may be specific implications and how any potential adverse impact may be mitigated against.

### **Age**

The proposal to remove the meals subsidy have a greater impact on older people as they are the significant user group.

Age	Cinnamon	%	Cedar	%	Ladywell	%
0 - 64	-		6	13%	17	31%
65 - 84	16	80%	19	40%	25	46%
85	4	20%	22	46%	12	22%
<b>Total</b>	20		47		54	

### Gender

Women make up the majority of users at the day centres and this reflects the demographics of an older population, due to life expectancy disparity from the age of 80+

Gender	Cinnamon	%	Cedar	%	Ladywell	%
Men	2	10%	12	25%	24	44%
Women	18	90%	35	75%	30	56%
<b>Total</b>	20		47		54	

### Disability

The proposal impacts on people with a disability or health condition at all centres because access to the service is based on people having significant assessed needs.

Disability	
Cinnamon	All have a form of disability & uses a walking aid
Cedar	All have a medical condition e.g. arthritis ,registered blind, dementia
Ladywell	All have a medical condition, some more severe than others

### Ethnicity

A number of culturally appropriate meals are provided at day centres and any meals offer will need to continue to meet the cultural preferences and needs of these populations

Ethnicity	Cinnamon	%	Cedar	%	Ladywell	%
White or White British	8	40%	30	67%	22	41%
Black or Black British	11	55%	12	27%	21	39%
Asian or Asian British	1	5%	3	7%	3	5%
Other Ethnic Group	0	0	0	0	5	9%
Not Known	0	0	0	0	3	5%

### Religion and Belief

The majority of service users declare themselves as having christian beliefs. There are a small number of services users from different faiths and this triangulates with the kinds of meals purchased currently (e.g. Halal). Any meals offer will need to continue to meet the cultural preferences and needs of these populations

Religion/belief	Cinnamon Court	%	Cedar Court	%	Ladywell	%
Christian	10	50%	28	62.22%	25	46.3%
Islam	1	5%	1	2.22%	2	3.7%
Hindu	1	5%	0	0	1	1.85%
None	4	20%	3	6.67%	3	5.56%
Unknown	4	20%	13	28.89%	23	42.59%

### Marriage and Civil Partnership

There is no discrimination as a result of these proposals in relation to marital and civil partnership rights. It is noted, however, that a significant number of the service users are single, widowed or divorced and of that number, a significant number of people using the Cinnamon Court and Cedar Court services live alone. Therefore the day service provider and the Council should have regard to and monitor the impact of these proposals on those people, ensuring that their health and wellbeing is well supported, particularly those with no visiting relatives or other social networks.

Marital Status	Cinnamon Court	%	Cedar Court	%	Ladywell	%
Divorced	2	10.00%	8	19.05%	2	4.08%
Widowed	6	30.00%	11	26.19%	12	24.49%
Single	4	20.00%	10	23.81%	14	28.57%
Married	8	40.00%	13	30.95%	21	42.86%
Live Alone	11	55.00%	14	33.00%	0	0

### Pregnancy and Maternity

There is no specific information on this protected characteristic discrimination as a result of these proposals in relation to pregnant service users or maternity conditions.

### Sexual Orientation

There is no specific information on this protected characteristic discrimination as a result of these proposals in relation to sexual orientation

### Gender Reassignment

There is no specific information on this protected characteristic discrimination as a result of these proposals in relation to gender reassignment

## 3.0 Conclusion

- 3.1 Some service users reflect some protected characteristics which will require mitigation through a culturally or belief specific meals option continuing to be available. Furthermore, there are a large number of single people using the hot meals service currently many of whom live alone, though the most vulnerable group at Ladywell do not, and some of the people living alone using the Cedar Court and Cinnamon Court day services also use the Extra Care service to which they are attached and so there are generally support systems to check and ensure that people continue to eat well however that food is prepared and served.



- 3.2 While not a specific characteristic, officers note that some of the questionnaires returned through the consultation, which are likely to have been completed by clients or their families, state that they will no longer attend the centre if the meals proposals are implemented. This is a possible detriment of the proposals and will be monitored through the implementation phase and mitigating actions taken on an individual basis as may be necessary.

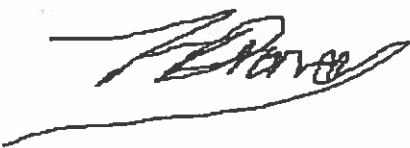
# Agenda Item 11

<b>Chief Officer Confirmation of Report Submission</b>		
<b>Cabinet Member Confirmation of Briefing</b>		
<b>Report for: Mayor</b>		
<b>Mayor and Cabinet</b>		X
<b>Mayor and Cabinet (Contracts)</b>		
<b>Executive Director</b>		
<b>Information</b>	<input type="checkbox"/>	<b>Part 1</b> <input checked="" type="checkbox"/> <b>Part 2</b> <input type="checkbox"/> <b>Key Decision</b> <input type="checkbox"/>

<b>Date of Meeting</b>	15 <sup>th</sup> November 2017	
<b>Title of Report</b>	Response to the referral from the Safer Stronger Communities Select Committee on the Review of Demographic Change	
<b>Originator of Report</b>	Paul Aladenika	<b>Ext.47148</b>

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources		
Legal Comments from the Head of Law	√	
Crime & Disorder Implications	√	
Environmental Implications		
Equality Implications/Impact Assessment (as appropriate)	√	
Confirmed Adherence to Budget & Policy Framework		
Risk Assessment Comments (as appropriate)		
Reason for Urgency (as appropriate)		

Signed:  Executive Member

Date: 6/11/17

Signed:  Director/Head of Service

Date: 7-11-17

**Control Record by Committee Support**

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	

<b>Mayor and Cabinet</b>			
<b>Title</b>	Response to the referral from the Safer Stronger Communities Select Committee on the Review of Demographic Change		
<b>Wards</b>	All		
<b>Contributors</b>	Chief Executive, Executive Director for Resources		
<b>Class</b>	<b>Part 1</b>	<b>Date</b>	15 November 2017

## **1. Purpose**

- 1.1 This report sets out the response to the views and comments arising from the Safer Stronger Communities Select Committee's review entitled: "Demographic Change". The final report of the review was presented to the Safer Stronger Communities Select Committee on 26 June 2017.

## **2, Recommendations**

- 2.1 It is recommended that the Mayor:
- i) Approves the response from the Executive Director for Resources and Regeneration to the comments of the Safer Stronger Communities Select Committee.
  - ii) Agrees that this report should be forwarded to the Safer Stronger Communities Select Committee.

## **3. Policy Context**

- 3.1 Shaping Our Future, the Council's Sustainable Community Strategy includes the following priority outcomes which shape borough's approach to the welfare of its citizens:
- Ambitious and Achieving – where people are inspired and supported to fulfil their potential.
  - Safer – where people feel safe and live free from crime, antisocial behaviour and abuse
  - Empowered and Responsible – where people can be actively involved in their local area and contribute to supportive communities.
  - Healthy, Active and Enjoyable – where people can actively participate in maintaining and improving their health and wellbeing.
  - Dynamic and Prosperous – where people are part of vibrant localities and town centres, well connected to London and beyond.

3.2 The Council's priorities describe the specific contribution that the Council will make to the delivery of the Sustainable Community Strategy priorities. For this report, the relevant Council priorities are as follows:

- Strengthening the local economy
- Young people's achievement and involvement
- Inspiring efficiency, effectiveness and equity

#### **4. Background**

4.1 At its meeting on 13 September 2017, the Safer Stronger Communities Select Committee considered the final report on the review of Demographic Change. Following the Select Committee meeting, a referral was made to advise Mayor and Cabinet asking that the Executive Director for Resources and Regeneration respond to the review's recommendations. The above-mentioned responses are set out below:

5. Referral: Recommendation 1

5.1 That given the high cost of living in London and the comparatively low levels of income after housing costs; London-weighting should better reflect the additional costs faced by employees.

Response

5.2 The London Borough of Lewisham incorporated London Weighting into base salaries a number of years' ago. We are one of London's Borough Councils represented as part of the National Joint Council, which consults on pay at national level with our trade unions.

5.3 The pay scales for London are already above the National Living Wage and we were one of the first organisations to pay the London Living Wage which reflects additional costs faced by employees living in London.

6. Referral: Recommendation 2

6.1 That the National minimum wage for under 25s was a particular concern in London given the changes to housing benefit. It was also important to ensure the London Living Wage remained at an adequate level going forward.

Response

6.2 The London Living Wage is currently £9.75 per hour; with the new rate to be announced on 6 November 2017.

6.3 Lewisham remains committed to the London Living Wage as an employer.

6.4 The commitment extends to procurement exercises where the Council actively champions the London Living Wage, including the provision of the London

Living Wage in service contracts awarded to help ensure that the outsourcing of services or contracting with external providers does not drive down the rates of pay for members of staff employed by companies to work on Lewisham contracts..

- 6.5 Apprentices are the only category falling outside the London Living Wage. We currently have 16 (15.8 FTE) apprentices under 25 years old. Apprentices are paid at 75% of Scale 1B, equivalent to £7.50 per hour and is the same as the over 25 living wage rate. For candidates on a 2 year contract, they move to the over 25 London Living Wage in the second year, irrespective of age.
- 6.6 National Graduate Development Program (NGDP) employees are paid at spinal point 28 (£15.58 per hour) significantly more than the LLW; this is a nationally agreed rate. After 18 months, Lewisham moves NGDP employees to a PO3 salary. We currently have 3 out of 4 NGDP employees who are under 25 years of age.

7. Referral: Recommendation 3

- 7.1 That given the uncertainty around Britain leaving the EU – more work should be done to ensure that the Council understands the policy and service delivery implications as the situation evolves.

Response

- 7.2 Back in July 2017, officers prepared a detailed report for the Overview & Scrutiny Committee on Brexit. The report, which covered the process to date, right up until the commencement of Brexit negotiations has subsequently been shared with all scrutiny select committees. As the negotiations continue and specific implications for local government become clearer, further briefings will be prepared to facilitate discussion at both Member and officer level.

8. Referral: Recommendation 4

- 8.1 That long and short term demographic trends, birth rates and migration be monitored closely to ensure that the Council is accurately predicting the need for school places and adapting and investing efficiently to meet future need.

Response

- 8.2 Officers continue to work with the GLA demographics team alongside an independent forecasting advisor to ensure that school place planning is as up to date as possible.
- 8.3 With the launch of the new Place Planning Strategy 2017-22, officers also committed to ensuring that not only would forecasting be reviewed at least twice per annum, but that demand, supply and anticipated need would be reviewed every time new school census data became available each term.

Forecasting was revised for the first time this Summer and the full Autumn census data will shortly be available.

8.4 Additionally, the new governance structure that has been put in place, including the formation of a stakeholder forum ensures that up to date data is considered on at least a monthly basis.

9. Referral: Recommendation 5

9.1 That the Council work to enter into joint housing ventures with the private rental sector to create better opportunities for residents, as a potential method of reducing fees to residents, and as a potential income stream for the Council.

Response

9.2 Officers have been developing an approach to creating a joint venture property Development Company over the past eighteen months. This has twin purposes, first, it will address the problems faced by the large and growing section of the Lewisham community who rent privately, from a market made up predominantly of “accidental” and amateur landlords, and where there are few protections for tenants and limited security of tenure. The second is to enable the Council to develop a revenue stream to contribute to the overall Council finances and thereby secure services into the future.

10. Referral: Recommendation 6

10.1 That the Council ensures it makes the best possible use of metrics and analytics in informing policy development, budget allocations and decisions on service delivery. Senior officers and politicians should have a solid understanding of the current demographics and future predictions and projections such as 5, 10 and 15 year projections when making their decisions. Resources should be in place to ensure the Council has the capacity to provide this information.

Response

10.2 This is a crucial area of work that is ongoing and will be developed further. As it stands, major decisions such as budget savings, service change and policy development must be supplemented by analysis, both as a demonstration of rationale as well to evidence likely areas of impact. However, more will be done to improve in this area including looking at new tools that offer an enhanced level of analytical insight and provide simpler, cleaner presentation of complex data for the purpose of options appraisal and decision-making.

**11. Financial Implications**

11.1 There are no direct financial implications arising from this report.

**12. Legal Implications**

12.1 The Constitution provides for Select Committees to refer reports to the Mayor and Cabinet, who are obliged to consider the report and the proposed response from the relevant Executive Director; and report back to the Committee within two months (not including recess).

### **13. Equalities Implications**

13.1 The Council works to eliminate unlawful discrimination and harassment, promote equality of opportunity and good relations between different groups in the community and recognise and take account of people's differences.

### **14. Crime and Disorder/Environmental implications**

14.1 Section 17 of the Crime and Disorder Act 1988, as amended, places a duty upon Local Authorities to consider crime and disorder implications and in particular, "to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area." This statutory obligation is the same for the Authorities "responsible partners" too. The level of crime and its impact is influenced by the decisions and activities taken through the day-to-day functions of local bodies and organisations.

### **Background papers**

[Safer Stronger Communities Select Committee Referral to Mayor & Cabinet - 13 September 2017](#)

[Safer Stronger Communities Select Committee Review of Demographic Change - June 2017](#)

Report Author : Paul Aladenika, Policy Development and Analytical Insight.

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020 8314 7148

# Agenda Item 12

<b>Chief Officer Confirmation of Report Submission</b>	
<b>Cabinet Member Confirmation of Briefing</b>	
Report for: Mayor	<input type="checkbox"/>
Mayor and Cabinet	<input checked="" type="checkbox"/>
Mayor and Cabinet (Contracts)	<input type="checkbox"/>
Executive Director	<input type="checkbox"/>
Information <input type="checkbox"/> Part 1 <input checked="" type="checkbox"/> Part 2 <input type="checkbox"/> Key Decision <input type="checkbox"/>	

Date of Meeting	15 <sup>th</sup> November 2017	
Title of Report	Working together to tackle poverty in Lewisham - Final report of the Lewisham Poverty Commission	
Originator of Report	Simone van Elk	Ext. 46441

At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources		X
Legal Comments from the Head of Law	√	
Crime & Disorder Implications		X
Environmental Implications		X
Equality Implications/Impact Assessment (as appropriate)	√	
Confirmed Adherence to Budget & Policy Framework		
Risk Assessment Comments (as appropriate)		
Reason for Urgency (as appropriate)		

Signed:  Executive Member

Date: 24.10.17 \_\_\_\_\_

Signed:  Director/Head of Service

Date 31.10.17 . \_\_\_\_\_

### Control Record by Committee Support

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	



<b>MAYOR AND CABINET</b>		
<b>Title</b>	Working together to tackle poverty in Lewisham – Final report of the Lewisham Poverty Commission	
<b>Key Decision</b>	No	Item No.
<b>Ward</b>	all	
<b>Contributors</b>	Executive Director for Resources and Regeneration	
<b>Class</b>	Part 1	Date: 15 November 2017

## 1. Purpose

- 1.1 Mayor and Cabinet agreed on 7 September 2017, following a recommendation by Lewisham Council's Safer Stronger Communities Select Committee, to establish a Commission to review poverty in the borough and develop recommendations to tackle poverty.
- 1.1 The Lewisham Poverty Commission was established and held its first meeting in February 2017. Attached is the Commission's final report "Working together to tackle poverty in Lewisham". The report contains recommendations to Lewisham Council, other public sector bodies in the borough, partners in the borough's voluntary and community sector and national government.
- 1.2 This Mayor and Cabinet report provides an outline of the scope of Lewisham Poverty Commission, its focus for preparing recommendations and the process that was followed to come to these recommendations. This report contains recommendations for Mayor and Cabinet to respond to the Commission's report.
- 1.3 The 'Working together to tackle poverty in Lewisham – Final report of the Lewisham Poverty Commission' is attached as appendix A. A separate executive summary is attached as Appendix B.

## 2 Recommendations

- 2.1 The Mayor is recommended to:
  - Welcome the challenge and insight provided by the Lewisham Poverty Commission and thank the Commissioners for their time and expertise
  - Note the final report of the Lewisham Poverty Commission and its recommendations
  - ask officers to develop a detailed response to the report's findings and recommendations including an action plan
  - retain a Cabinet Member with responsibility for overseeing Lewisham Council's actions to tackle poverty, including presenting a yearly report to the Council's scrutiny and executive functions so progress can be tracked.

### 3 Policy context

- 3.1 Lewisham's Sustainable Communities Strategy (2008-2020) sets out a vision of a resilient, healthy and prosperous borough. The Strategy informs the direction of Council policy and it guides the process of decision making. One of the governing principles of the Strategy is the ambition to 'reduce inequality and narrow the gap in outcomes for citizens'. It is recognised in the Strategy that '...deprivation and poverty can limit people's prospects (and) some of our communities are more likely to experience their effects than others'.
- 3.2 In addition, the Council has a number of corporate priorities, three of which are particularly relevant to the commission's work: Community leadership, Decent Homes for All and Strengthening the local economy. The Commission has made recommendations for action in each of these areas.
- 3.3 The final report of the Lewisham Poverty Commission makes recommendations to Lewisham Council and its partners on how poverty can be alleviated, how its negative effects can be mitigated against and how people's resilience can be strengthened. The Commission recommendations therefore contribute to the aims of Lewisham's Sustainable Communities Strategy and to the three corporate priorities of the Council as outlined above.

### 4 Lewisham Poverty Commission

#### *The Commission*

- 4.1 The Lewisham Poverty Commission was set up to combine expertise about poverty with expertise about the local area. Its members were:
- Alice Woudhuysen, Child Poverty Action Group
  - Bharat Mehta, Trust for London
  - Bill Davies, Head of Policy, Central London Forward
  - Claire Mansfield, New Local Government Network
  - Debbie Weekes-Bernard, Joseph Rowntree Foundation
  - Gloria Wyse, Lewisham Citizens
  - Councillor Joe Dromey (*Chair*), Cabinet Member for Policy and Performance
  - Dr Simon Griffiths, Senior Lecturer in Politics, Goldsmiths
  - Councillor Brenda Dacres, Lewisham Council
  - Councillor Colin Elliot, Lewisham Council
  - Councillor James J-Walsh, Lewisham Council
  - Councillor Joan Millbank, Cabinet Member for Third Sector and Community
  - Councillor Joyce Jacca, Lewisham Council

#### *Scope of the Commission's work*

- 4.2 Poverty is complex and multidimensional. The Commission has used the Joseph Rowntree Foundation's definition, where poverty is a situation in which 'a person's resources (mainly their material resources) are not sufficient to meet their minimum needs (including social participation)'.<sup>1</sup> In this definition, 'needs' encompass both basic material goods and the ability to participate in social life. The term 'resources' refers to the financial and in-kind means necessary to meet these needs. In-kind resources may be formal goods and services (those provided by a local authority, for example) or

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<sup>1</sup> See <https://www.jrf.org.uk/report/definition-poverty>.

informal goods and services (accessed via social networks or community organisations, for example).

- 4.3 The Commission was set up to draft recommendations that aim to alleviate poverty, mitigate against its negative effects and strengthen people's resilience. At its first meeting, the Commission discussed the need to be targeted in its approach to the issue, as poverty is such a broad concept. The Commission has also been aware of the limited time available to them. As a result, the Commission agreed to focus on policy areas and recommendations that could have a genuine impact for people living in poverty in Lewisham.
- 4.4 Many of the Commission's recommendations have been directed at Lewisham Council. The Commission has recognised that local authorities have a significant impact on the lives of their residents through the many services they provide, commission and facilitate. The Commission has also recognised the good work Lewisham Council has been doing for many years to tackle poverty and support its residents who are dealing with the consequences. However a local authority by itself can only do so much, particularly given the government's decision to cut two third of Lewisham Council's funding since 2010; cuts which are set to continue. In this context, the Commission has worked to create recommendations to the Council that are ambitious but realistic.
- 4.5 The Commission has been keenly aware that local authorities also have a significant role to play in their local area by bringing local partners together to tackle pressing issues. The borough contains many significant publicly funded institutions aside from the Council including a world class university, social housing providers, a large further education college as well as a large NHS trust. All provide important services for the citizens of Lewisham including education, housing and care. These organisations also make up a significant proportion of local employment and are significant sources of investment in the local area. The Commission's final report therefore sets out ambitious actions for Lewisham Council with its local partners to take to make a real difference to the lives of local people.
- 4.6 Finally, some of the barriers faced by the poorest Lewisham residents could only be removed through changes in policy by national government. The Commission has therefore also called on national government to play their part: to support people that desperately need it and to create the conditions that enable individuals, local communities and local organisations to solve poverty.

## **5. The Commission's areas of focus**

### *Supporting residents to access well-paid, secure jobs inside and outside of Lewisham*

- 5.1 The main and sustainable route out of poverty is getting people into well-paid and secure jobs. Lewisham is situated on the doorstep of London, a growing and thriving city, and three in five residents work outside of the borough. While the London employment market is easy for residents to access, the growth in jobs has been at the high and low end of the labour market, with comparatively few jobs in-between. There has also been a growth in insecure employment. Given this, and the Government's cuts to funding for training, it can be difficult for residents in low-paid and insecure jobs to progress to higher-paid and secure work. Lewisham's local economy is comparatively small, with the lowest number of jobs per capita of any London borough and a high proportion of jobs in Small and Medium-sized Enterprises (SMEs).
- 5.2 Supporting, growing and attracting businesses in Lewisham will be important to increase job opportunities for Lewisham residents. In the absence of large private

employers, Lewisham's public sector institutions play an important role not just as providers of public services, but as major employers too. These partners working together to increase employment opportunities for Lewisham residents and opportunities to develop their skills so residents can advantage of the local and London-wide labour market have therefore been an area of focus for the Commission.

#### *Tackling child poverty by supporting parents into decent work*

- 5.3 Lewisham is among the 20 local authorities with the highest levels of child poverty in the UK. Child poverty has a direct impact on the life chances of young people, limiting their ability to achieve their potential. Children in lone parent households are more likely to grow up in poverty as lone parents often struggle to find flexible and high quality employment that fits around childcare.
- 5.4 The Commission has recommended ways to improve the availability of flexible and high-quality job opportunities in the borough and opportunities for parents to develop their skills, ways to improve the affordability but also accessibility of child care and finally, access to advice about entitlements to child care as well as general advice about benefits.

#### *Improving the local housing market*

- 5.5 The cost of housing is an important factor in London's and Lewisham's higher poverty rate. Over one in four Londoners live in poverty after housing costs are taken into account, compared with one in five nationally. House prices in Lewisham are lower than the London average, but they have risen sharply, and the median house price is 14 times greater than the median income. Given high housing costs and a shortage of social homes, more residents are living in the private rented sector. Rents are rising fast, and many residents are subject to rogue landlords and insecurity.
- 5.6 The Commission has made recommendations about ways the Council can enhance its housebuilding programme, influence the private rented sector to improve conditions for residents, and work to prevent homelessness. Finally, the Commission has looked at changes to national policies that would increase the Council's ability to invest in social housing and help prevent residents going into rent arrears.

## **6 Engagement with residents, partners and stakeholders**

- 6.1 The Commission has been keenly aware of how important it is to include the Council's partners but particularly our residents in their work. The Commission has prepared their final report following several months of research and public consultation. The process involved a qualitative study of the lived experience of poverty in Lewisham; analysis of quantitative data and existing literature on poverty; discussions at local assemblies across the borough; an online consultation; a summit which brought together communities and wider stakeholder representatives from across the borough.
- 6.2 The Commission has held four meetings during the course of its work. At the first meeting on 28 February 2017, the Commission discussed its scope and focus. The Commission was also presented with data about Lewisham's population and the nature of poverty in the borough. The second meeting on 4 May provided the Commission with a paper on the experience of life in Lewisham for people on low incomes as well as information on the Council's work in their areas of focus, as well as examples of positive work done elsewhere. The third meeting was the Lewisham Poverty Summit on 12 July, to discuss the Commission's thinking with partners,

stakeholders and residents, and get feedback. At their final meeting on 28 September, the Commission has agreed its final report and recommendations.

- 6.3 The voices and experiences of those who are or were experiencing poverty are particularly important to the Commission. People themselves will (often) know best what would help them, but engaging people can be challenging. The approach taken was to allow people to comment and provide their ideas while genuinely listening to them.
- 6.4 All Lewisham Councillors have also been informed about the project as it progressed and approached to provide comments. The Commission was aware that local Councillors have a wealth of knowledge about their local area and their residents, so are seen as important partners.

#### *Lived experience paper*

- 6.5 The Commission has considered a paper on the experience of life in Lewisham for people on low incomes. The paper provided some qualitative material to complement the quantitative, policy-focused picture in the other background papers. The material was gathered from conversations and informal interviews with Lewisham residents, who were approached via a number of voluntary and community organisations in the borough.
- 6.6 Much of the material was gathered from people who are 'getting by', rather than those destitute or in crisis, and the paper shows some of what enables residents to 'stand on their own two feet', to borrow one resident's words. Conversations with residents highlighted the precariousness of life for many in the borough (the fact that everyone is 'only a pay check away from poverty', as one put it), the importance of access to advice and support networks, and the value of a sense of place and community. In their discussion of the paper, Commissioners noted the high levels of physical and mental health problems in Lewisham and the associated barriers to employment and social participation. However, they also recognised the importance of building on residents' existing skills, interests and desire to contribute to their communities.

#### *Website and online call for evidence*

- 6.7 The Commission has a webpage at [www.lewisham.gov.uk/povertycommission](http://www.lewisham.gov.uk/povertycommission). It contains information about the Commission's work including papers for its meetings as well as a call for evidence. The page also contained a short survey where people as well as organisations could submit their views, experiences and suggestions for change. The questions asked in the survey were:
- What makes it difficult to make ends meet in Lewisham?
  - What can you and your community do to help make it easier to get by?
  - What can the Council and its partners do to help?
  - Is there anything else you would like the Commission to know about?
- 6.8 The webpage and survey have been promoted via the Council's social media accounts and were included in the Lewisham Life email several times.

#### *Local Assemblies*

- 6.9 All Councillors were invited to add an item on the Lewisham Poverty Commission to the agenda for their assemblies in this period. These sessions have allowed the assemblies to discuss the work of the Commission and poverty in the borough generally. A toolkit for the discussion session was developed in advance and provided

to all Councillors. Six of the borough's local assemblies have taken up this opportunity: Crofton Park, Grove Park, New Cross, Blackheath, Catford South and Evelyn.

#### *Visits*

- 6.10 A number of visits to drop-in centres have been arranged to hear about residents experiences and thoughts, both for officers working on the project and for Commissioners. The organisations or projects visited have been the Council's housing options centre, two of the borough's Children's Centres, the provider of employment support for the Pathways to Employment programme, a community library, the Whitefoot and Downham Community Food Project, a employment support programme by a local housing provider, Lewisham Credit Union, a local church and a session of the Council's Young Advisors meeting.

#### *London Boroughs*

- 6.11 All London Boroughs were written to, so they were aware of the Commission's work and so they could share examples of good work in their areas. Those Councils that had experience of organising their own Commissions on fairness, equality or poverty were also specifically asked to share lessons they had learnt. The responses were incorporated in some of the papers presented to the Commission at their last meeting.

#### *The Lewisham Poverty Summit*

- 6.12 The Lewisham Poverty Summit took place on Wednesday 12<sup>th</sup> July. The Summit was an opportunity to discuss the Commission's work with the Council's partners and stakeholders. More than 70 people attended, including representatives from partner organisations, the voluntary and community sector, faiths organisations and residents.

## **7 The Council's response**

- 7.1 The Lewisham Poverty Commission has functioned as an advisory body to the Council. Its membership has combined expertise about poverty with expertise about the local area. Following the extensive consultation processes described in section 6, it has now made recommendations to Lewisham Council in each of the policy areas described in section 5. The Commission has worked to make recommendations that are realistic but ambitious, and fit the specific circumstances of poverty in the London Borough of Lewisham.
- 7.2 The Mayor is now asked to note the "Working together to tackle poverty in Lewisham" report and ask officers to develop a detailed response to its recommendations for Lewisham Council. This response should include an action plan.
- 7.3 The Commission is aware that tackling poverty will not happen overnight. The Commission has therefore requested that a Cabinet Member retains specific responsibility for overseeing Lewisham Council's actions to tackle poverty, and recommends that this Cabinet Member present a yearly report to the Council's scrutiny and executive functions, so progress can be tracked.
- 7.4 Finally, the Mayor is asked to thank the members of the Commission for their time and expertise, and the insight they have provided to the Council.

## **8 Financial implications**

- 8.1 There are no financial implications following from this report.

- 8.2 The Lewisham Poverty Commission has been focused on improving and coordinating existing work by the Council and its partners as opposed to recommendations that would require additional financial resources.
- 8.3 Financial implications may arise when it comes to the implementation of the recommendations in the Working together to tackle poverty in Lewisham – Final report of the Lewisham Poverty Commission. However, any decision to spend money would then be subject to the Council's formal decision-making.

## **9 Legal implications**

- 9.1 There are no specific legal implications for this report, save for noting the obligations imposed pursuant to the Equality Act 2010.
- 9.2 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.

It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above.

- 9.3 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 9.4 The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

- 9.5 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

- [The essential guide to the public sector equality duty](#)
- [Meeting the equality duty in policy and decision-making](#)
- [Engagement and the equality duty: A guide for public authorities](#)
- [Objectives and the equality duty. A guide for public authorities](#)
- [Equality Information and the Equality Duty: A Guide for Public Authorities](#)

9.6 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance#h1>

## **10 Equalities implications**

- 10.1 The Commission has worked to challenge some of the systemic inequalities existing in the borough. Its recommendations are aimed at tackling poverty and preventing the negative impacts it has on people's lives, such as lower educational attainment, a persistence of intergenerational poverty, and poor physical and mental health outcomes.
- 10.2 The Commission has made every effort in its work to draw views and ideas from across the community, but particularly from those residents living in poverty in Lewisham. The process of engagement followed by the Commission is described in section 6 of this report.
- 10.3 Any decisions that arise from the implementation of the recommendations in the Commission's "Working together to tackle poverty in Lewisham" report will be subject to the Council's formal decision-making and an assessment of the equalities implications of those decisions will be made then. Poverty is not a protected characteristic under the Equality Act 2010, as per paragraph 9.2.

### **Background documents and originator**

Appendix A: Working together to tackle poverty in Lewisham – Final report of the Lewisham Poverty Commission

Appendix B: Working together to tackle poverty in Lewisham – Final report of the Lewisham Poverty Commission, Executive Summary

Further information about the Lewisham Poverty Commission and its work can be found here: [www.lewisham.gov.uk/povertycommission](http://www.lewisham.gov.uk/povertycommission)

For further information, please contact Simone van Elk, 020 831 46441



# Working together to tackle poverty in Lewisham

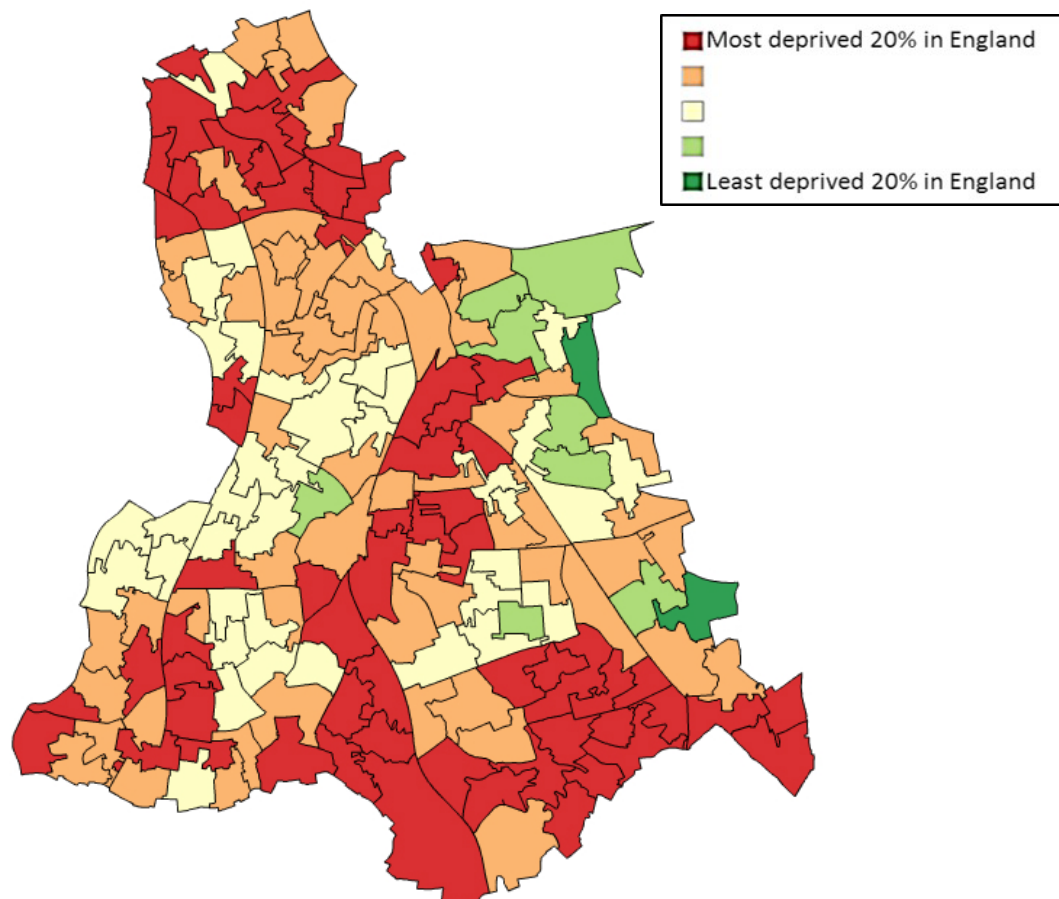
## The final report of the Lewisham Poverty Commission, September 2017 Executive summary

### Poverty in Lewisham

Lewisham is a successful, diverse and inclusive inner London borough. The borough has good transport links to the rest of London, excellent primary and improving secondary schools, attractive residential neighbourhoods and an active voluntary and community sector. Yet, despite its many assets, its proximity to Central London, and the efforts of the Council and other partners, Lewisham continues to have high levels of poverty and deprivation.

Unemployment in Lewisham has fallen significantly in recent years and incomes are higher than the national average. However, high levels of inequality and high housing costs contribute to high levels of poverty. Lewisham is in the top 20% most deprived local authorities in England, with particular concentrations of poverty in the north and south of the borough. One in four people working in Lewisham earn less than the Living Wage, and Lewisham has amongst the highest levels of child poverty in the country.

Figure 1. A map showing Lewisham's Index of Multiple Deprivation (IMD) scores by small areas.<sup>1</sup>



<sup>1</sup> DCLG 2015. The IMD measures relative deprivation across: income; employment; education, training and skills; health deprivation and disability; crime; barriers to housing and other services; and the living environment.

Poverty is complex and multidimensional. The Commission has used the Joseph Rowntree Foundation's broad definition, where poverty is a situation in which a person's resources are not sufficient to meet their minimum needs, including social participation.<sup>2</sup> Poverty blights lives. It is associated with lower educational attainment, with poor health and mental health, and with shorter life expectancy. Children who grow up in poverty often go on to suffer from poverty in adult life.

The Lewisham Poverty Commission was set up by Lewisham Council to investigate the extent of, causes of, and solutions to poverty in Lewisham. Made up of local Councillors and national experts, the Commission has heard a range of evidence on poverty in Lewisham, including the lived experience of residents who are struggling to make ends meet. From this evidence, four key areas of focus were chosen:

### **A) supporting residents to access well-paid, secure jobs inside and outside of Lewisham**

Well-paid, secure jobs are the main route out of poverty. Lewisham is situated on the doorstep of London, a growing and thriving city, and three in five residents work outside of the borough. While the London employment market is easy for residents to access, the growth in jobs has been at the high and low end of the labour market, with comparatively few jobs in-between. There has also been a growth in insecure employment. Given this, and the Government's cuts to funding for training, it can be difficult for adults in low-paid and insecure jobs to progress to higher-paid and secure work. Lewisham's local economy is comparatively small, with the lowest number of jobs per capita of any London borough and a high proportion of jobs in Small and Medium-sized Enterprises (SMEs). In the absence of large private employers, Lewisham's public sector institutions play an important role not just as providers of public services, but as major employers too.

*'There are no big businesses in Lewisham, or trades young people can be apprenticed to'*  
Grove Park Assembly

#### **Recommendations:**

- The Council and its public sector partners, as the borough's main employers and biggest spenders in terms of procurement, should cooperate closely to support local economic growth and good jobs. This group of anchor institutions should work to establish a 'Lewisham Deal' which outlines joint commitments to good work and inclusive economic growth. This should include a commitment to fair pay, flexible work and investing in training.
- The Council and its public sector partners should develop a shared approach to skills and local economic development. Building on the strength of the Council's existing apprenticeship programme, this should include maximising spending of the apprenticeship levy to support access to high-quality employment and better career prospects.
- The Council should support inclusive growth and good jobs in the local economy. It should support the creation and growth of new businesses, including by increasing the availability of high-quality business premises, through the provision of co-working spaces, and through a local currency to stimulate local demand. The Council should continue to promote fair pay, including through incentives for local employers to become accredited Living Wage employers.

<sup>2</sup> See <https://www.jrf.org.uk/report/definition-poverty>.

## **B) Tackling child poverty by supporting parents into decent work**

Lewisham is in the top 20 local authorities in the country in terms of child poverty. Child poverty has a direct impact on the life chances of young people, limiting their ability to achieve their potential. Children in lone parent households are more likely to grow up in poverty as lone parents often struggle to find flexible and high quality employment that fits around childcare.

*'We young single parents aren't getting the help that we're supposed to. There is work out there, but the work that you want to do, who's going to look after the children or pick them up for you?... Once we can get help, there is cleaning jobs out there, there is evening jobs out there. If I could get somebody, I would go. It's not as though I don't want to work. I'm happy to work because I'm having it hard.'*

**A single mother and Phoenix resident.**

### **Recommendations:**

- The Council should take the lead on providing flexible and high-quality employment opportunities for local residents, including those with childcare responsibilities. It should become an accredited Timewise employer, and encourage other local employers to follow its lead.
- The Council should raise awareness of and increase the use of local high-quality childcare provision. The Family Information Service (FIS) directory should be improved to include detailed information on available childcare and information on eligibility criteria for that care. This should be provided through an accessible digital platform.
- The Council should work with Children's Centres, providers and parent groups to explore ways to encourage parents and extended family to participate in the provision of childcare, including by exploring options for co-operative childcare clubs and parent-led nurseries. Parents participating in these forms of co-produced child care can then also be supported into related careers.

### **C) Improving the local housing market**

The cost of housing is an important factor in London's and Lewisham's higher poverty rate. Over one in four Londoners live in poverty after housing costs are taken into account, compared with one in five nationally. House prices in Lewisham are lower than the London average, but they have risen sharply, and the median house price is 14 times greater than the median income. Given high housing costs and a shortage of social homes, more residents are living in the private rented sector. Rents are rising fast, and many residents are subject to rogue landlords and insecurity.

#### **Recommendations:**

- The Council should continue to deliver as much affordable and social housing as possible, as part of mixed communities. It should push developers to maximise the amount of affordable housing and push the government to lift the cap on borrowing from the Housing Revenue Account.
- The Council should establish a social lettings agency in Lewisham to work with mainstream landlords in order to offer more secure tenancies at the lower end of the market. This could be done either through expanding the work of its existing lettings agency or encouraging an existing social or ethical lettings agency to operate in the borough.
- In order to protect tenants in the private rented sector, the council should seek to expand its landlord licensing scheme and a local tenants' union should be established in the borough to offer advice services and organise campaigns. Lewisham Citizens, Goldsmiths' students union and existing tenant and residents associations could be asked to develop the union.

*'Provide more advice on what people should do with rent arrears' Crofton Park Assembly*

## D) Strengthening support within communities

Lewisham has a strong community and a long history of civic activism. At present, there are over 800 active voluntary groups, with a recent survey revealing that 35% of Lewisham residents had volunteered over the past 12 months. From speaking to residents, we know how valuable support within communities can be for people facing poverty. Where people can tap into both formal and informal networks, they are more likely to be able to access goods and services (including information, advice and support), to find work and to feel connected to a place.

### Recommendations:

- The Lewisham Local collaboration<sup>3</sup> should consider developing an anti-poverty fund to fill the current gap in micro-grants to support local community activity. This could be funded by using relevant financial contributions from planning obligations.
- The Council should improve and promote its employee volunteering policy to encourage council staff to contribute to local communities. This employee volunteering policy can then be used as an exemplar for Lewisham Local partners to promote to businesses inside and outside the borough, and encourage best practice.

*'It needs to be easier for people to know how they can volunteer'* **Blackheath assembly**

## Working together to tackle poverty

The Commission encourages Lewisham Council to adopt these recommendations and to begin implementing them as soon as possible. The Commission recommends that the next Mayor appoints a lead member on poverty, and that they report back on an annual basis to scrutiny and the executive on progress in tackling poverty in Lewisham.

However, the Council can't do this alone. If we are to make a real difference in tackling poverty, we need to work together with local partners, and we need policy change from national government.

The Commission will be writing to the Secretary of State for Work and Pensions, the Secretary of State for Communities and Local Government, and the Housing Minister to start a conversation about improvements to the welfare system, to prevent people going into debt, and improvements to local government finance, to increase the building of social housing.

Poverty can be tackled but only if we all work together.

<sup>3</sup> For more information about Lewisham Local, see [www.lewishamlocal.org.uk/](http://www.lewishamlocal.org.uk/)

# Working together to tackle poverty in Lewisham



The final report of the Lewisham Poverty Commission

October 2017



# Contents

Foreword	3
1. Introducing the Poverty Commission: a realistic but ambitious approach	4
The Commission	4
Focusing on poverty	4
The role of Lewisham Council in tackling poverty	5
Action at a local level	5
Working together to tackle poverty	5
2. Poverty in Lewisham	6
Lewisham and its people	6
The impacts of poverty	6
Quantifying poverty in Lewisham	8
The difficulties in getting well-paid, secure work	10
Children living in poverty	13
The price of unaffordable housing	14
The Commission's focus	14
3. Supporting residents to access well-paid, secure jobs inside and outside of Lewisham	15
Works, skills and the role of anchor institutions	15
Recommendations	17
4. Tackling child poverty by supporting parents into decent work	20
Child poverty, child care and lone parent unemployment	20
Recommendations	21
5. Improving the local housing market	23
Housing in Lewisham	23
Recommendations	24
6. Strengthening support within communities	27
Increasing community resilience	27
Recommendations	29
7. Working together to tackle poverty: next steps and implementation	31
An immediate response	31
Change across the community	31
Advising national government	31
Staying the course	31
Appendix 1: Listening to Lewisham's people and its organisations	32
Our approach to consultation and engagement	32
Further data and evidence	33
Summary of comments received from residents	34

## Foreword

Lewisham is a great place to live, with a strong and diverse community. Yet, despite being situated in the heart of London, on the doorsteps of one of the wealthiest cities in the world, tens of thousands of Lewisham residents live in poverty.

There is a wealth of evidence of the damage poverty does. We know child poverty is associated with lower educational achievement, and it prevents kids from fulfilling their potential. We know poverty is linked to poor physical and mental health, and to shorter life expectancy. We know poverty is often inter-generational, with people growing up poor being more likely to suffer from poverty later in life. And we know that high levels of inequality; with significant wealth alongside poverty, is a cause of significant social ills. A fundamentally unequal society can never be a good society.

Lewisham has a proud record of fighting poverty. We are proud that we were the first council to become an accredited Living Wage employer, and since we introduced a business rate incentive, the number of Living Wage employers locally has rocketed. We've seen strong employment growth, with the Council helping hundreds of residents into work in recent years.

Yet despite our efforts, poverty in Lewisham remains stubbornly high. And we know things may get worse. The Government's failure to tackle the housing crisis has been a driver of poverty in London. Their welfare freeze has led directly to an increase in poverty both for those who can't work, and those in work on low pay. And the Government's huge cuts to Lewisham Council's funding limit what we can do to tackle poverty.

But we know there is more that we can do. That's why the Safer Stronger Select Committee called for a Commission to review our approach. This report is the outcome of the Lewisham Poverty Commission. It has involved a new approach; with Councillors working alongside local stakeholders and national experts to look at the nature of poverty in Lewisham, assess what we're currently doing and what other councils are doing, and develop a comprehensive plan to tackle the scourge of poverty. We've spoken to residents affected by poverty, we've sought input from across the community, and we've come up with some recommendations which we think are ambitious but practical and which we hope can make a real difference.

We've focused on four areas; supporting residents to access decent work; tackling child poverty; improving the local housing market; and strengthening support within communities. In each area, we've made recommendations which we hope the current Mayor and the next Mayor will implement. But we can't do this alone. If we are to make a real impact, we will need to work with local partners, and we will need to continue to push for changes in Government policy.

I am grateful to Safer Stronger Select Committee for proposing this commission, to our Mayor Sir Steve Bullock for asking me to Chair it, to everyone who fed in and to our fantastic officers for their support – particularly Simone van Elk. But most of all, I'm hugely grateful to all our commissioners who gave their time and their significant expertise.

We all share a commitment to tackling poverty. It's what drives us. We hope that the work of the Lewisham Poverty Commission can help us tackle the scourge of poverty in our community.



Councillor Joe Dromey, Chair of the Lewisham Poverty Commission



# 1. Introducing the Poverty Commission: a realistic but ambitious approach

## The Commission

Tackling poverty, deprivation and inequality is at the heart of Lewisham Council's vision for a resilient, healthy and prosperous borough. With this in mind, Lewisham Council agreed to convene the Lewisham Poverty Commission to understand and tackle the poverty faced by residents and communities in Lewisham, bringing Council representatives together with partner organisations of the Council.

The Commission is a group of local councillors and poverty experts that have come together to consider how poverty can be tackled in the borough. Its members are:

Alice Woudhuysen (Child Poverty Action Group)	Bharat Mehta (Trust for London)
Bill Davies (Central London Forward)	Councillor Brenda Dacres
Claire Mansfield (New Local Government Network)	Councillor Colin Elliot
Debbie Weekes-Bernard (Joseph Rowntree Foundation)	Gloria Wyse (Lewisham Citizens)
Councillor James J-Walsh	Councillor Joan Millbank
Councillor Joe Dromey ( <i>Chair</i> )	Councillor Joyce Jacca
Dr Simon Griffiths (Goldsmiths)	

## Focusing on poverty

Poverty is complex and multidimensional. The Commission has used the Joseph Rowntree Foundation's definition, where poverty is a situation in which 'a person's resources (mainly their material resources) are not sufficient to meet their minimum needs (including social participation)'.<sup>1</sup> In this definition, 'needs' encompass both basic material goods and the ability to participate in social life. The term 'resources' refers to the financial and in-kind means necessary to meet these needs. In-kind resources may be formal goods and services (those provided by a local authority, for example) or informal goods and services (accessed via social networks or community organisations, for example).

The principal aim of the Commission has been to agree recommendations to alleviate poverty in Lewisham, mitigate against its negative effects and strengthen people's resilience.

The Commission has prepared this final report following several months of research and public consultation. The process involved a qualitative study of the lived experience of poverty in Lewisham; analysis of quantitative data and existing literature on poverty; discussions at local assemblies across the borough; an online consultation; a summit which brought together communities and wider stakeholder representatives from across the borough.<sup>2</sup> This report summarises the Commission's findings on poverty in Lewisham and presents their recommendations to the Council and partners.

<sup>1</sup> See [www.jrf.org.uk/report/definition-poverty](http://www.jrf.org.uk/report/definition-poverty).

<sup>2</sup> A full methodology can be found as Appendix 1.

## **The role of Lewisham Council in tackling poverty**

Many of the Commission's recommendations are naturally directed at Lewisham Council. The Commission recognises that local authorities have a significant impact on the lives of their residents through the many services they provide, commission and facilitate – examples include children's centres, the provision of temporary accommodation and employment support programmes. The Commission also recognises the good work Lewisham Council has been doing for many years to tackle poverty and support its residents who are dealing with the consequences. However a local authority by itself can only do so much, particularly given the government's deep cuts to local government budgets since 2010; cuts which are set to continue. In this context, the Commission has worked to create recommendations to the Council that are ambitious but realistic.

## **Action at a local level**

The borough contains many significant publicly funded institutions aside from the Council including a world class university, social housing providers, a large further education college as well as a large NHS trust. All provide important services for the citizens of Lewisham including education, housing and care. These organisations also make up a significant proportion of local employment and are significant sources of investment in the local area. The Commission has therefore also looked at positive steps these organisations, together with the Council, can take to tackle poverty.

## **Working together to tackle poverty**

The Commission has been keenly aware that local authorities also have a significant role to play in their local area by bringing local partners together to tackle pressing issues. This report therefore sets out ambitious actions for Lewisham Council and other local partners which we hope can make a real difference to the lives of local people.

Nevertheless there are limits to what local organisations can do by themselves to tackle the problem of poverty in Lewisham. Some of the barriers faced by the poorest Lewisham residents can only be removed through changes in policy by national government. The Commission therefore also calls on national government to play their part: to support people that desperately need it and to create the conditions that enable individuals, local communities and local organisations to solve poverty.

Poverty can be tackled but only if we all work together.

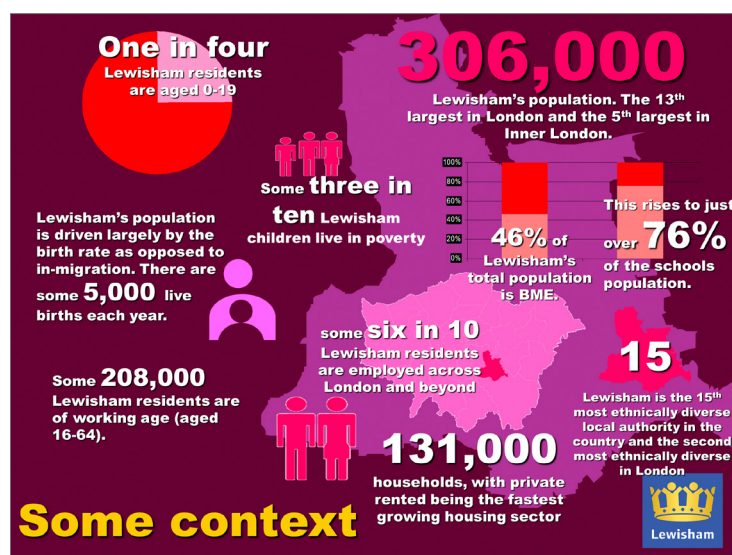
## 2. Poverty in Lewisham

### Lewisham and its people

Lewisham is a successful, diverse and inclusive inner London borough. The borough has good transport links to the rest of London, excellent primary and improving secondary schools, attractive residential neighbourhoods and an active voluntary and community sector.

Lewisham has a population of 306,000 people. It is the 15th most ethnically diverse borough in the country. From the 2011 Census, 46.4% of Lewisham's people are from a Black, Asian, and, Minority Ethnic (BAME) background. 14.4% of Lewisham's residents described themselves as living with a long-term health condition in the Census, compared to 17.6% for England. It also a very young borough as a quarter of its residents are less than 20 years old. Lewisham is characterised by the energy and diversity of its local communities and shares several characteristics with both inner and outer London. Yet, despite its many assets and rich history as a leader in debates surrounding social justice, Lewisham continues to have high levels of poverty and deprivation.

Figure 1. An overview of the demographics of Lewisham



### The impacts of poverty

There is a wealth of evidence of the negative impact of poverty on people's lives.

#### Educational attainment and intergenerational poverty

Children growing up in poverty have far poorer educational outcomes than other children. Pupils who receive free school meals (FSM) are significantly less likely to achieve good GCSE results. In England, 43.1% of children on FSM score a grade C or better for English and maths GCSEs, compared to 63% of all children. The numbers in Lewisham are 45.9% for children on FSM compared to 56.2% overall.<sup>3</sup> Nationally, just one in five (22%) young people on FSM progresses to university, compared to two in five (39%) young people who did not receive FSM.<sup>4</sup>

Partly as a result of the large gaps in educational attainment between those who grow up in poverty and those who don't, there are high levels of intergenerational transmission of poverty, where poverty is transferred from one generation to the next, and low levels of social mobility in the UK.<sup>5</sup>

<sup>3</sup> Department for Education, 2016 at [www.compare-school-performance.service.gov.uk/](http://www.compare-school-performance.service.gov.uk/)

<sup>4</sup> Department for Education (DfE), Widening participation in Higher Education, England, 2016

<sup>5</sup> Office for National Statistics, Intergenerational transmission of disadvantage in the UK and the EU, Sept 2014

Children growing up in the most deprived 10% of neighbourhoods in the UK are at least 10 times more likely to be taken into care or put on a child protection plan than children in the 10% least deprived neighbourhoods<sup>6</sup>. In Lewisham, the number of looked after children per 10,000 population is 65.1, compared to 60 nationally.<sup>7</sup>

### **Physical health and life expectancy**

People who are poor tend to die younger than people who are not. In England, the wealthiest women live on average 6.6 years longer than the most deprived. For men, the gap is 7.7 years.<sup>8</sup> This is particularly relevant for homeless people who are sleeping rough. Their average life expectancy is 42, compared to 79 for women and 76 for men nationally.

Poverty also has a significant impact on people's physical health. People living in poverty have increased rates of cardio-vascular diseases and lung cancer as well as respiratory illnesses related to cold housing.

### **Mental health and wellbeing**

Reduced income, income inequality, unemployment and unaffordable housing have all been associated with poor mental and physical health outcomes.

Stress, anxiety, depression, substance misuse disorders and minor psychiatric illnesses have all been linked to different aspects of living in poverty, such as being in debt, experiencing a decrease in household income or being unemployed. Some studies have shown that the risk of death by suicide was two to three times higher for unemployed people compared to those with jobs.<sup>9</sup> Furthermore, those working in insecure and low-paid jobs are more at risk of suffering from stress, and job insecurity has been strongly associated with depression.<sup>10</sup> This was born out in interviews with Lewisham residents and community organisers:

*'People begin at a place where they, you know, if they got a job they probably wouldn't be able to cope because they don't have the correct coping strategies around anxiety, around saying what they think, around turning up for things on time, that kind of thing. And a lot of that is around mental health... I mean some weeks we'll have hardly anyone here and when you ask people why, it's because they were really depressed and they couldn't get out of bed or that kind of thing.'*

**Reverend, Church in Downham**

<sup>6</sup> The Child Welfare Inequalities Project, led by Coventry University at [www.coventry.ac.uk/Global/08%20New%20Research%20Section/Researchers/CCSJ/CWIP%20Summary%202015.pdf](http://www.coventry.ac.uk/Global/08%20New%20Research%20Section/Researchers/CCSJ/CWIP%20Summary%202015.pdf)

<sup>7</sup> Report on Lewisham Council's children's social care budget from September 2017 at <http://councilmeetings.lewisham.gov.uk/documents/s52583/04%20Childrens%20social%20care%20budget%20270917.pdf>

<sup>8</sup> Public Health England, 2016

<sup>9</sup> Giuntoli, 2011 at <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/unemployment-mental-health-full.pdf>

<sup>10</sup> The Marmot review, 2010 at <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf> and Meltzer et al (2010) Job insecurity, socio-economic circumstances and depression in Psychological Medicine.

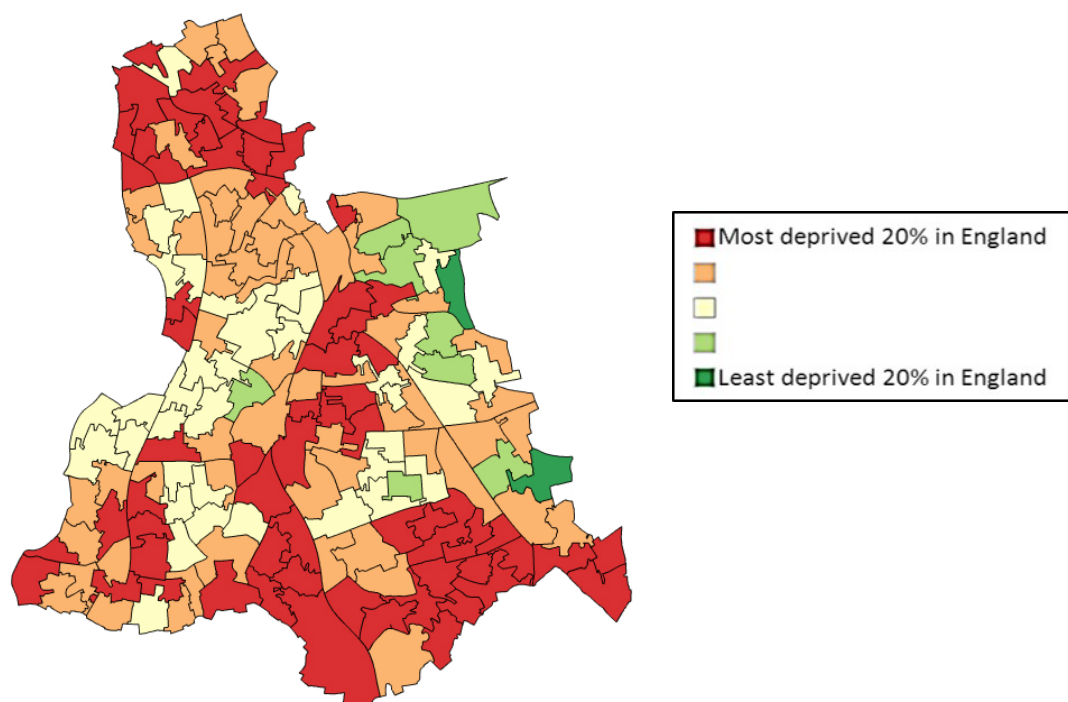
## Quantifying poverty in Lewisham

Lewisham is situated close to the centre of London, one of the wealthiest cities in the world. Yet as with many London boroughs, Lewisham's community still suffers from high levels of poverty and inequality.

According to the Department for Communities and Local Government's 2015 Index of Multiple Deprivation (IMD), the borough ranked 48th out of 326 local authorities (1st being most deprived). This is a marked improvement from 2011 when it was ranked 31st, yet Lewisham remains well within the most deprived quartile of local authorities.

There are significant variations by area in Lewisham. Two of Lewisham's neighbourhoods are in the least deprived 20% in the country, while 63 of the borough's communities (37%) are in the 20% most deprived in the country. Areas of significant wealth exist alongside areas with high levels of deprivation. There are concentrations of deprivation in the far north and the far south of the borough.<sup>11</sup>

**Figure 2.** A map showing Lewisham's Index of Multiple Deprivation (IMD) scores by LSOA<sup>12</sup> (Source: DCLG 2015).



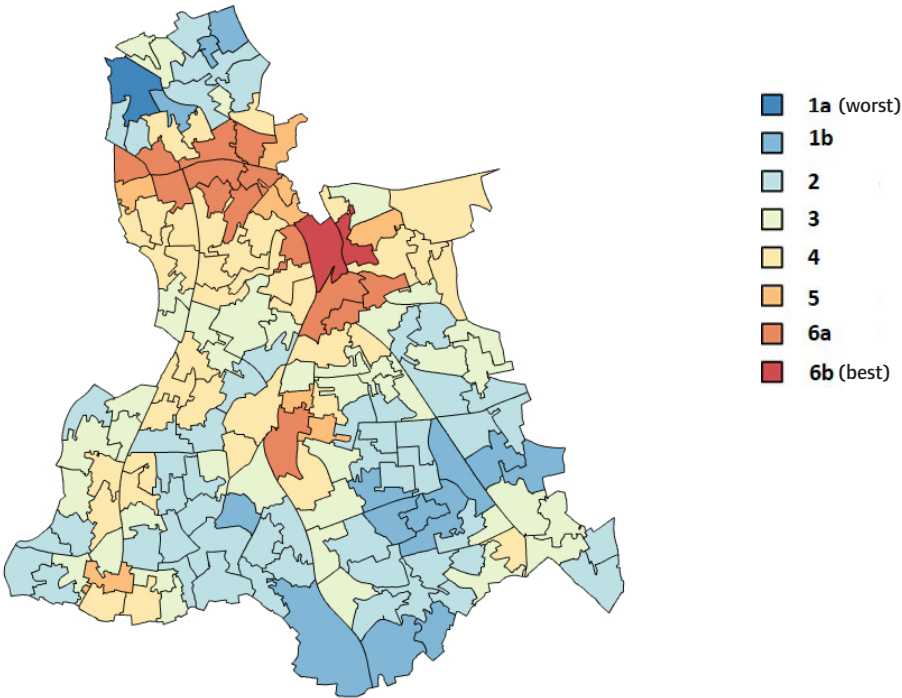
<sup>11</sup> The IMD measures relative deprivation across 7 domains: income; employment; education, training and skills; health deprivation and disability; crime; barriers to housing and other services; and the living environment.

<sup>12</sup> Lower Super Output Areas (LSOAs) are geographical areas with an average population of 1,500 people used in the IMD. Lewisham has 169 LSOAs spread across 18 wards.

In the Trust for London’s 2017 London Poverty Profile, Lewisham ranked among the bottom 25% of all 32 London boroughs for the average across all indicators. The Trust noted that Lewisham is in the worst four boroughs for numbers of out-of-work benefit claimants, the average size of income loss from Council tax support and proportion of 19 year olds lacking level 3 qualifications.<sup>13</sup> The borough was worst amongst London Boroughs for pupils receiving A\*-C grades in English and maths.<sup>14</sup>

In the north of the borough, high housing costs and low incomes combine to produce high levels of deprivation, but there are good connections to the rest of London. In the south, housing tends to be marginally more affordable but incomes are low and residents are more likely to be unemployed and in receipt of out-of-work benefits. One of the key challenges across the south of the borough is poor transport connectivity, with low Public Transport Accessibility Levels (PTALs)<sup>15</sup>, as illustrated by Figure 3. There is a significant overlap between poor transport accessibility and concentrations of deprivation in the borough.

**Figure 3.** A map showing PTAL’s across Lewisham.



*‘The cost of public transport’ [makes it difficult to get by]*  
**Grove Park Local Assembly**

<sup>13</sup> For information, level 3 qualifications are, or are similar in level to A-levels. For details of what different qualification levels mean, see [www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels](http://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels)

<sup>14</sup> [www.trustforlondon.org.uk/data/boroughs/borough-overview/](http://www.trustforlondon.org.uk/data/boroughs/borough-overview/)

<sup>15</sup> PTAL is a measure of connectivity of an area by public transport. PTAL values range from 0-6, with 6 representing the best connectivity. Data for London can be found here: <http://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

## The difficulties in getting well-paid, secure work

While unemployment has fallen, and while average incomes in Lewisham are higher than the UK average, high levels of inequality and high housing costs lead to high levels of poverty.

*'Alright, they say you can get round it. You can do cheap meals, yeah I do now that. But it's just that little bit of extra money, little bit of pocket money that you can go and buy a pair of shoes [with] or something like that. That's all it is, really, just having that extra bit of money. And that's what the government don't understand.'*

**Woman, part-time employed**

Median weekly earnings in the borough in 2016 were £620.80 for full time workers compared to £632.4 in London and £541.80 for England and Wales.<sup>16</sup> Men in Lewisham earn £641.4 a week, which is below the London average for men but above the England average, whilst women at £586.8 a week are above both the London and England averages for women.<sup>17</sup> The median household income across the borough is £29,848, 15% lower than the London average. There is also significant income equality in Lewisham, reflected in Figure 1 above. In four wards (Evelyn, Bellingham, Downham and New Cross) the median income is below £25,000.

Unemployment in Lewisham has fallen steadily for the last six years and now stands at 5.7% of the working age population. This is in line with the London average (5.7%) but higher than the national average (4.7%). Lewisham has higher levels of people on out of work benefits than the rest of London (9.1% compared to 7.2%). The numbers of adults claiming Job Seekers Allowance (JSA) has fallen in recent years, though at 1.7% it is higher than the London average of 1.2%. While the number of JSA claimants has declined, the numbers for Employment Support Allowance and Incapacity benefits claimants have largely staid the same, with 5.7% of the population on these benefits compared to 4.8% across London. The number of lone parents claiming out of work benefits is also higher; 1.5% compared to 1.0% in London.<sup>18</sup>

<sup>16</sup> NOMIS, official labour market statistics by Office for National Statistics, Labour Market Profile Lewisham, 2016 at <https://www.nomisweb.co.uk/reports/lmp/la/1946157254/report.aspx?town=lewisham>

<sup>17</sup> <http://councilmeetings.lewisham.gov.uk/documents/48217/06055AnnualReview2016Safer080317.pdf>

<sup>18</sup> NOMIS, see footnote 13

The government's welfare freeze will have a significant impact on these groups.

*'It is extra hard for some – if you have a disability, if you aren't white, if you are queer – poverty isn't just about resources, it's racism, homophobia'*  
Crofton Park Local Assembly

There are significant differences in the employment rates among different groups of residents. Unemployment is far higher among men in Lewisham at 6.5% than among women at 4.1%. This is above the London average for men, whereas for women it is significantly below<sup>19</sup>. Across the UK the unemployment rate for people from a BAME background is 8.2% compared to 4.3% for people who self-identify as white ethnic. For Lewisham the numbers are 8.1% for BAME residents and 4.1% for white ethnic.<sup>20</sup> There is also a significant disability employment gap nationally, with just 48.3% of disabled people aged 16-64 in employment in the last quarter of 2016 compared to 80.5% of non-disabled people<sup>21</sup> and 9% of economically active disabled people are unemployed across the UK.<sup>22</sup> In Lewisham, 22.4% of people who are economically inactive are long-term sick, compared to just 16.7% across London.<sup>23</sup> Some people will be part of more than one group that is disadvantaged in the labour market and this can compound any difficulties they face in getting well-paid, secure work.

While Lewisham has seen significant falls in unemployment in recent years, it has also seen a significant rise of in-work poverty. In 2015, it was estimated that 27% of Lewisham's residents were earning less than the London Living Wage (£9.75 per hour since April 2017). This is higher than at any time since 2008, suggesting that wages are not keeping pace with rising living costs.

Lewisham has a very small economy, with a predominance of small and micro businesses and very few larger businesses. Lewisham's public sector institutions are the major employers in the borough. It is well connected by transport links into Westminster, the City of London, Canary Wharf and Southwark and over 60% of Lewisham residents work outside the borough. Job density – the number of jobs per working age adult – is 0.40 in Lewisham, lower than all other London Borough.<sup>24</sup>

Lewisham was the joint first local authority in the country to become an accredited Living Wage employer.<sup>25</sup> Lewisham has also introduced a business rate discount to incentivise other local employers to become accredited Living Wage employers. The number of Living Wage employers in Lewisham has risen from 5 in 2015 to 33 in August 2017.<sup>26</sup>

<sup>19</sup> NOMIS, see footnote 13

<sup>20</sup> Annual Population Survey, April 2016 - March 2017

<sup>21</sup> House of Commons briefing paper nr 7540, Key statistics on people with disabilities in employment, Dec 2016

<sup>22</sup> Office for National Statistics, A08: Labour market status of disabled people, 16 August 2017

<sup>23</sup> NOMIS, see footnote 13

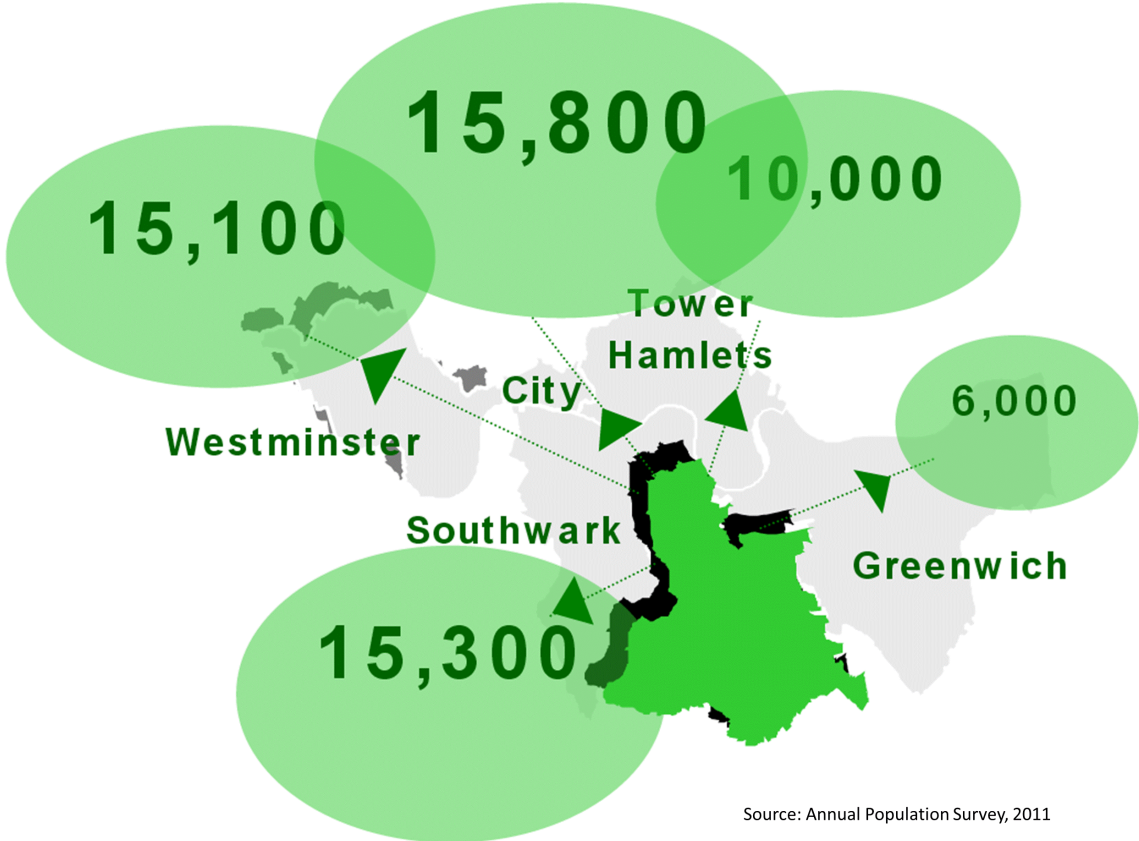
<sup>24</sup> Job density is a measure of the number of jobs in an area divided by the resident population aged 16-64. For example, a job density of 1.0 would mean that there is one job for every resident aged 16-64.

<sup>25</sup> [www.livingwage.org.uk/news/first-london-living-wage-borough-announced](http://www.livingwage.org.uk/news/first-london-living-wage-borough-announced)

<sup>26</sup> [www.lewisham.gov.uk/news/Pages/Living-Wage-employers-rise-by-560-per-cent.aspx](http://www.lewisham.gov.uk/news/Pages/Living-Wage-employers-rise-by-560-per-cent.aspx)



Figure 4. Commuter flows from Annual Population Survey, 2011.



The opportunities available in the wider London economy are vital for Lewisham’s residents, but there is a growing concentration of jobs both at the very high end of the skills spectrum and at the extreme lower end. This makes it difficult for people with low level qualifications to progress into well-paid jobs. While the London employment market is easy for residents to access, 6.3% of Lewisham’s working age residents having no qualifications and 35.9% have qualifications at Levels 1, 2 or 3.<sup>27</sup>

Well-paid, secure jobs are the main route out of poverty. This has therefore become an area of focus for the Commission.

## Children living in poverty

Lewisham is in the top 20 of local authorities in the country with highest levels of child poverty.<sup>28</sup> Child poverty has a direct impact on the life chances of young people, limiting their chances of succeeding at school and going on to find secure employment. Child poverty is also associated with a wide range of health-damaging impacts, including adverse long-term social and psychological effects. The poor health associated with child poverty limits children's potential and development, leading to reduced life chances in adulthood.<sup>29</sup>

Education and training are vital routes out of poverty. Lewisham has excellent primary schools, but it has the worst GCSE results in London and high numbers of young people with no qualifications. In Lewisham only 45.9% of pupils eligible for free school meals achieve 5 GCSEs at A\*-C, compared to 56.2% of all pupils. The pupil cohort that performed the least well (by March 2017) were black, white, and disadvantaged pupils.<sup>30</sup> The need to improve standards and raise educational outcomes, especially in secondary schools, was at the heart of the recommendations made by Lewisham's recent Education Commission.<sup>31</sup>

In 2015, it was estimated that 18.5% of children aged 0-15 in Lewisham lived in households in which a parent or guardian was claiming out-of-work benefits, the seventh highest of all 32 London boroughs. At the same time, being in work is no guarantee of escaping poverty. In 2015, the Institute for Fiscal Studies found that nearly two thirds of children in poverty lived in working households.<sup>32</sup> Low incomes, changes to the benefit system and the rise of insecure part-time work can put immense pressure on working parents with dependent children, especially in larger households.

Children in lone parent households are more likely to grow up in poverty as lone parents often struggle to balance work and childcare and are therefore more likely to be on low incomes. According to the last Census, 11% of households in the borough are lone parent households, compared to an average of 8.5% in inner London. The overwhelming majority (91.5%) of lone parent households in Lewisham are headed by women.

*'Financially, we get help with our rent, we get help with DLA [Disability Living Allowance]. But although we are probably getting a little bit more money than everyone else because of DLA, it's still a struggle on a day-to-day basis because, you know, all the kids go to different establishments. This week, for instance, it's Red Nose Day, so one has got own clothes day on Friday, they're needing a pound for that, the other one has got a play next week and they're needing a new t-shirt and new tracksuit bottoms for that, the other one has got a trip so they need a packed lunch, you know. There's always something.'*

**Mother of son with autism**

<sup>28</sup> After housing costs have been taken into account.

<sup>29</sup> See, for example, <http://adc.bmj.com/content/early/2016/02/08/archdischild-2014-306746>.

<sup>30</sup> <http://councilmeetings.lewisham.gov.uk/documents/s48217/06CESAnnualReview2016Safer080317.pdf>

<sup>31</sup> The Commission's final report is available at <http://councilmeetings.lewisham.gov.uk/documents/s44260/Lewisham%20Education%20Commission%20Report.pdf>

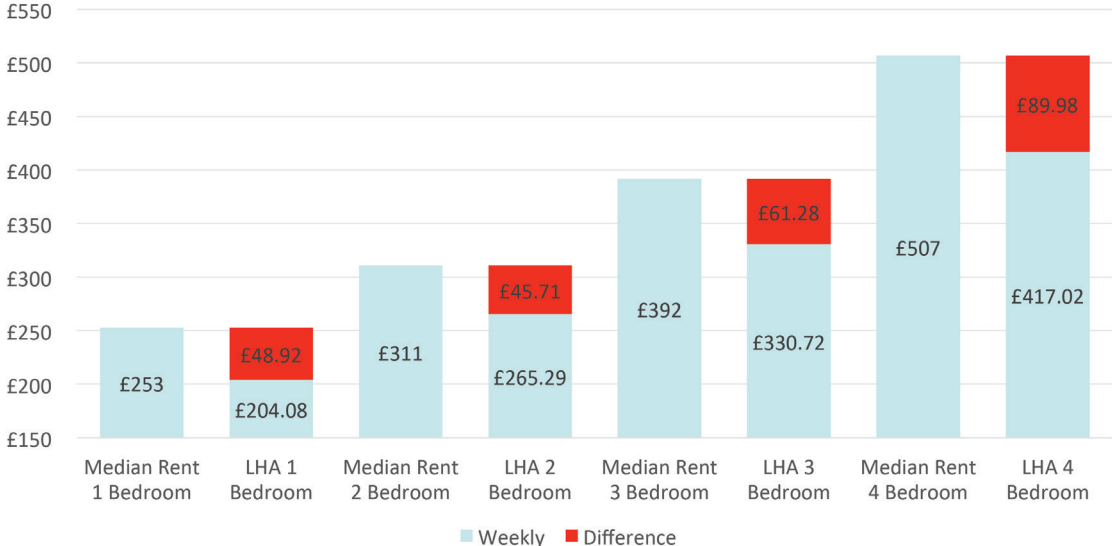
<sup>32</sup> <https://www.ifs.org.uk/publications/7880>.

## The price of unaffordable housing

The cost of housing is an important factor in London and Lewisham’s higher poverty rate. London and Lewisham have a higher than national average income but the cost of housing is such that 27% of Londoners and 31% of inner London residents (including Lewisham) live in poverty after housing costs are taken into account, compared with 21% nationally.<sup>33</sup>

House prices in Lewisham are currently lower than the London average, but the median house price is still 14 times greater than the median income in the borough. Private rents in Lewisham are below the inner London average but are rising faster than elsewhere in London, increasing by 40% between 2011 and 2016. This means many tenants pay more than half their income in rent. The median market rent in the borough also exceeds the maximum Local Housing Allowance (LHA) that can be claimed, and LHA rates have been frozen till 2020.

Affordability is an issue across all types of tenure.



*The Median Market Rent in the borough significantly exceeds the maximum Housing Benefit that can be claimed.*

Source: Valuation Office Agency, Inner London Housing allowance

## The Commission’s focus

The Commission also heard from people in Lewisham about what made it difficult to make ends meet in addition to a range of evidence on Lewisham’s population, London’s economy, the housing market, child poverty in the borough, and links between poverty and health outcomes.<sup>34</sup> From this evidence, four key areas of focus were chosen:

- Supporting residents to access well-paid, secure jobs inside and outside of Lewisham;
- Tackling child poverty by supporting parents into decent work;
- Improving the local housing market; and
- Strengthening support within communities.

<sup>33</sup> [https://data.london.gov.uk/apps\\_and\\_analysis/poverty-in-london-201516-2/](https://data.london.gov.uk/apps_and_analysis/poverty-in-london-201516-2/)

<sup>34</sup> A full methodology can be found as Appendix 1.

### 3. Supporting residents to access well-paid, secure jobs inside and outside of Lewisham

*'The kind of clients that we see, even where they are employed, they tend to be on low incomes, on zero-hours contracts, so the money that is coming in is not enough... but it's also not stable, it's not money that they can rely on... So yes, these cases are real in Lewisham... People don't have job security, they don't have well-paid jobs and, in most cases, they really are, you know, on the edge.'*

**Citizens Advice Bureau caseworker, Lewisham Advice Bureau**

#### **Works, skills and the role of anchor institutions**

While Lewisham has a low jobs density, London has a thriving economy with an immense range of employment opportunities. The challenge for the Council and other local public sector partners is to equip residents with the necessary skills to ensure that they can benefit from the projected growth of London's economy by finding secure, well-paid jobs, with opportunities for personal fulfilment and progression. This is particularly important as Universal Credit will extend conditionality within the benefits system to claimants who are already in work and earning below a certain threshold.

Jobcentre Plus administers benefits and provides advice on finding employment, with the Work Programme supporting those who have been long-term unemployed. This has been relatively effective in supporting those on JSA into work, but it was far less successful with those on incapacity benefits. In this context, Lewisham has been working with Lambeth and Southwark to deliver the Pathways to Employment programme, a council-led employment-support service which has helped people with complex employment support needs into work. In its first phase, the programme helped 25% of participants into work,<sup>35</sup> compared to 3.9% for ex Incapacity Benefit ESA claimants after a year on the Work Programme.<sup>36</sup> In total the programme has now supported 380 residents into work.

The Work Programme is soon to be replaced by the Work and Health Programme. In Central London, the programme will be known as Central London Works. This will be more devolved, and support will be more focused on those who face greater challenges, including health and mental health conditions. However, the budget for the programme will be far smaller, with £554m over the lifetime of the Work and Health Programme, compared to an estimated £1.5bn spent on disability employment through the Work Programme and Work Choice.<sup>37</sup> It therefore risks being unable to meet the levels of demand and provide support for those in Lewisham who may need it.

*'There are no big businesses in Lewisham, or trades young people can be apprenticed to'*  
**Grove Park Assembly**

<sup>35</sup> <http://moderngov.southwark.gov.uk/documents/s58339/Report%20Pathways%20to%20employment%20phase%20-%20contract%20award.pdf>

<sup>36</sup> <https://publications.parliament.uk/pa/cm201516/cmselect/cmworpen/363/363.pdf>

<sup>37</sup> <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2015/future-of-jobcentre-plus-report-published-16-17/>

While Lewisham has a highly qualified population, residents who don't have high levels of qualification face poorer employment outcomes and often lack support into training. The number of adults aged 19 and over starting a further education or skills course in Lewisham declined by 27.5% between 2012/13 and 2015/16.<sup>38</sup> This was broadly in line with the decline seen nationally (28.0%) and it followed a 35% reduction in spending on adult skills in the last parliament.<sup>39</sup>

The number of apprenticeship starts among Lewisham residents jumped from 530 in 2007/8 to 2170 in 2011/12.<sup>40</sup> Nine in ten apprenticeship starts in Lewisham are at level 2 or level 3, with nearly half (43.6%) being among those aged 25 and over. It has remained relatively stable since then. From April, the government's apprenticeship levy came into effect, under which large employers have to pay 0.5% of their payroll into a digital account, with the funds only being redeemable against apprenticeship training fees. Given Lewisham's employment profile, only large public sector employers will pay the levy, and much of the levy funds may go unspent. The levy may stimulate investment in training by large employers across the rest of London but there are concerns it may lead to lower apprenticeship recruitment among smaller non-levy paying employers as some aren't willing to pay the 10% co-investment contribution.<sup>41</sup> This could have a particular impact in Lewisham, given the predominance of Small and Medium-sized Enterprises (SMEs) in the local economy.

The reductions in funding for further education and for adult education provided by local authorities combined with the reduced footprint for employment support under the Central London Works programme, will make it difficult for many adults – both those unemployed and those in work on low pay – to access the training and support they may need. It also raises questions over how people who will be subject to in-work conditionality in the future under Universal Credit, will be able to access the training they may need to improve their income.

While there are immense opportunities in the London economy, the low jobs density in Lewisham means there are fewer high quality local employment opportunities for residents than in other boroughs. As well as supporting residents to access opportunities in the Lewisham and London economy, Lewisham Council should also seek to promote business growth and high-quality jobs locally. In addition, if existing proposals for the extension of the Bakerloo line through Lewisham and Catford to Bromley Town Centre as well as Hayes are implemented, residents living in the south of the borough would gain significantly better access to job opportunities across London.

*'We need to do more to reach the working strugglers'*  
**Blackheath Assembly**

<sup>38</sup> DfE and Education and Skills Funding Agency (ESFA), Further Education (FE) Data Library, 2017

<sup>39</sup> Associations of Colleges submission for July 2015 budget at <https://www.aoc.co.uk/sites/default/files/AoC%20submission%20to%20the%20Budget%205%20June%202015.pdf#page=28>

<sup>40</sup> DfE and ESFA, FE Data Library, 2017

<sup>41</sup> Association of Employment and Learning Providers and Warwick Institute for Employment Research, The impacts of the apprenticeship levy, 2017.

Beyond this, there is an important role for ‘anchor institutions’ - bodies such as local authorities, hospitals, universities, housing associations and large private sector organisations - in tackling poverty and promoting inclusive growth.<sup>42</sup> As Lewisham has no large private employers, all of these institutions are public.

Through the money they spend procuring goods and services, the number of local people they employ, and their ownership of public assets, these institutions make significant contributions to the local economy. The table below provides staff numbers for some of the bigger public organisations in the borough allowing for a rough indication of their impact as local employers:<sup>43</sup>

<b>Anchor institutions</b>	<b>Full-time equivalent staff (2016)</b>
Lewisham Council	2,038
Goldsmiths	1,156
Lewisham Southwark College	398
Lewisham and Greenwich NHS Trust	6,065
Lewisham Homes	468
Phoenix Community Housing	158

These anchor institutions can have a significant impact on the local workforce and employee conditions by the training they provide their staff, the working conditions they offer such as opportunities for flexible working, and general support they provide their staff, particularly those with health conditions. The amount spent on procurement by such bodies can be used to negotiate social value in contracts, such as training opportunities and pay conditions. Finally, there are also wider benefits such as working with the borough’s large and diverse voluntary sector and existing programmes such as Lewisham Local.<sup>44</sup>

**Recommendations**

**Anchor institutions**

- **The Council and its public sector partners**, as the borough’s main employers and biggest spenders in terms of procurement, should cooperate closely to support local economic growth. This group of anchor institutions should work to establish a ‘Lewisham Deal’ which outlines joint commitments to improve opportunities for residents and support inclusive local economic growth. The Lewisham Deal could include:
  - A coordinated approach to apprenticeships to promote opportunities for residents, including maximising the local spend of the apprenticeship levy for upskilling and in-work progression, building on the strength of the Council’s existing apprenticeship programme.

<sup>42</sup> See, for example <https://www.jrf.org.uk/report/we-can-solve-poverty-uk> and [https://www.thersa.org/globalassets/pdfs/reports/rsa\\_inclusive-growth-commission-final-report-march-2017.pdf](https://www.thersa.org/globalassets/pdfs/reports/rsa_inclusive-growth-commission-final-report-march-2017.pdf).

<sup>43</sup> The information has been taken from respective organisations’ statement of accounts, annual accounts or annual employment profiles. This information can’t be easily compared, as a number of these organisations work across borough boundaries and their financial years end on different dates. It also doesn’t contain information about the organisations’ overall spend either as direct provider of services or through procurement.

<sup>44</sup> For more information about Lewisham Local, see <https://www.lewishamlocal.org.uk/>

- A shared commitment to London Living Wage accreditation and promotion, flexible working and opportunities for job progression for employees.
- A shared commitment to support good mental health in work by committing to the 'Time to Change' Employer Pledge,<sup>45</sup> by developing an action plan that normalises conversations about mental health in the workplace and ensures that employees who are facing these problems feel supported.
- A shared commitment to generating social value through procurement, for example by negotiating for the provision of apprenticeships and job opportunities for local residents.
- A commitment to investigate whether the organisation's procurement processes could create opportunities for local, often smaller, businesses to provide goods and services, to enable more money to stay in the borough.
- A shared strategic approach to the skills and local economic development agenda, including training, employment opportunities and business engagement. This could enable the skills shortages in the NHS and wider public sector to be met through higher level apprenticeships, pre-employment support, training while in employment and routes through to Further Education (FE) and Higher Education (HE).
- A coordinated approach to encourage staff to contribute to local communities by linking staff and service users with local volunteering opportunities.
- A joint commitment to supporting the community and voluntary sector by building on existing work by Goldsmiths, Voluntary Action Lewisham and the Lewisham Local collaboration.
- A commitment to engage with local schools and FE colleges to raise aspirations of their students and provide information and advice about apprenticeships and further/higher education or work experience opportunities.

### **Improving the work and skills landscape locally**

- **The Council** should work with Lambeth, Southwark and Jobcentre Plus to build on the success of its joint Pathways to Employment programme to develop a pilot that supports career progression for residents who are in work, but in poverty.
- **The Council's adult education service** should work with partners, including **housing providers**, to support those furthest away from the job market to develop soft skills by providing access to pre-employment training.
- **The Council and its partners** should continue to prioritise the improvement of Lewisham's secondary schools to offer young people the best start in life, building on the work of the Lewisham Education Commission.
- **The Council and its partners** should explore ways to raise aspirations and provide good quality careers advice in schools by linking industry, public sector institutions, professional trade bodies and HE and FE providers with local schools. The Council and partners should start a pilot where their staff, via their staff volunteering programmes, are encouraged to volunteer

in support schools and FE colleges with careers advice and mentoring programmes. This can be expanded to include people working elsewhere in Lewisham and London.

- **The Council's Pension Investment Committee** should use its influence as an investor of roughly £1bn to open discussions about pay, working conditions and job opportunities for London residents with the businesses it invests in across London.
- **The Council** should use its procurement processes to ensure that all components of the Social Value Act (2012) are geared towards the needs of the most deprived members of the borough. The Council should include statements on the social value offer in the reports it uses in the Council's formal decision-making processes including for its Mayor and Cabinet meetings, for decisions to go to tender or to award a contract.
- **The Council** should encourage business growth in the borough, particularly in growth sectors of the London economy. This should build on the success of the existing Council created Dek co-working business spaces <sup>46</sup> and investigate the potential to introduce a local currency – the Lewisham Pound – to support local businesses.
- **The Council** should continue to champion the Living Wage in Lewisham. It should continue to provide an incentive in the form of a business rates discount to employers that become accredited London Living Wage employers.
- Regeneration should deliver not just the homes that Lewisham needs, but high quality jobs too. **New residential developments** should look to provide space for businesses, particularly new and small businesses, so employment in the borough can be stimulated.

### **Regional and national changes to work and skills**

- **The Council** should work with **Central London Forward and other London partners** to ensure that the devolved Central London Works Programme offers the support local people need to overcome barriers to employment and access high quality jobs. Where possible, the Central London Works Programme should link to existing infrastructure, communities and local partner organisations, building on the success of the Pathways to Employment programme.
- **Transport for London** should extend the Bakerloo line from Elephant and Castle beyond Lewisham to Hayes as a minimum but also to Bromley Town Centre to improve access to job opportunities across London for residents living in the areas of concentrated deprivation in the south of the borough.
- **The Council** should lobby central government to ensure that London boroughs can use unspent apprenticeship levy to invest in business support and the wider skills development of their residents alongside their employees.

*'Do something to stop the delay in benefits'*  
**Catford South Local Assembly**



- **Central government** should pause the roll out of Universal Credit and review its design and implementation, particularly the 6-week wait for an initial payment which is causing many recipients to fall into debt.<sup>47</sup> The **Council** should also lobby central government for an end to the welfare freeze which are impacting on those who are out of work and those who are in work on low incomes, pushing both further into poverty, and for a reversal of the cuts to Universal Credit.

## 4. Tackling child poverty by supporting parents into decent work

*'We young single parents aren't getting the help that we're supposed to. There is work out there, but the work that you want to do, who's going to look after the children or pick them up for you?... Once we can get help, there is cleaning jobs out there, there is evening jobs out there. If I could get somebody, I would go. It's not as though I don't want to work. I'm happy to work because I'm having it hard.'*

**A single mother and Phoenix resident.**

### Child poverty, child care and lone parent unemployment

Parents in Lewisham face two major and inter-related challenges to being able to increase their incomes. One is finding suitable employment; another is finding affordable and suitable childcare.

Part-time and/or flexible employment opportunities are vital in enabling lone parents, and parents in general, to juggle childcare with work. Only 27.7% of lone parents in Lewisham are in full-time employment and another 27.8% in part-time employment, leaving 44.6% not in employment. There is evidence that single parents want access to flexible work, but are not always able to find it.<sup>48</sup> Research suggests that nations with higher maternal employment rates – more mothers in work – are more likely to have employers that offer flexible work options, including the ability to set some of your own hours or to use accumulated hours to earn leave.<sup>49</sup>

The other major challenge facing all parents is suitable and affordable childcare. Access to flexible, affordable childcare can reduce pressures on family income and help parents to participate in work, education or training. According to research, four in ten mothers identify childcare costs as the single biggest obstacle to work (42 per cent of those in work and 41 per cent of those not working).<sup>50</sup> Childcare has to be affordable, sufficiently flexible and available at the right time to enable parents to combine work and family life.

<sup>47</sup> <https://www.citizensadvice.org.uk/about-us/how-citizens-advice-works/media/press-releases/citizens-advice-responds-to-news-universal-credit-roll-out-will-not-be-paused/>

<sup>48</sup> [http://www.gingerbread.org.uk/file\\_download.aspx?id=7866](http://www.gingerbread.org.uk/file_download.aspx?id=7866).

<sup>49</sup> <http://www.resolutionfoundation.org/media/press-releases/two-in-three-mothers-say-high-cost-of-childcare-is-a-barrier-to-working-more/>.

<sup>50</sup> See the Resolution Foundation report cited above.

Lewisham has a broad mix of childcare provision and a good reputation for the high standard of its early years provision. There are good working relationships between the Council and Early Years Foundation Stage (EYFS) providers across the sector that have been established over a long period and a strong shared commitment to delivering high quality provision.

The challenges for Lewisham are to promote high quality, well-paid, flexible job opportunities, and ensure the provision of flexible and high quality child care by promoting innovative models of childcare. The Council also needs to ensure that parents have access to high quality, up to-date advice about childcare provision in the borough. Parents may also need support understanding their childcare entitlements, especially the new 30 hours entitlement for three- and four-year olds which has recently been introduced as well as the existing entitlement for some two-year-olds of 570 hours of free early education or childcare per year. Finally, information about and access to benefits is crucial for parents who are not in work and for those parents who work but are on low incomes.

## Recommendations

### Opportunities for flexible working and skills development

- The Council should set an example by improving its offer of flexible working opportunities. The Council should become an accredited Timewise employer<sup>51</sup> and work with the Timewise foundation to develop an improvement plan that ensures it offers good quality flexible working opportunities to its employees. The Council should encourage its partners to do the same.
- **The Council** should work with its public sector partners to promote flexible working across the borough to support parental and lone-parent employment, including by engaging with local businesses.
- **The Council** should work with employment and skills partners to support lone parents to develop the skills that will enable them to take jobs that offer flexible working opportunities.
- **The Council's adult education service** and **the local FE college** should work together to help parents with childcaring responsibilities to access opportunities that allow them to upskill and support their career progression. This could be done by creating flexible and/or family friendly learning opportunities that lead from the Adult Learning Lewisham through to more formal learning in a college setting.

*'Access to relevant learning opportunities'*  
Evelyn/New Cross Local Assembly

<sup>51</sup> <http://timewise.co.uk/what-we-do/accreditation/>

## Access to information and advice

- **The Council's** Family Information Service (FIS) directory should be improved so that it provides easy-to-use to contain up-to-date information on childcare provision in the borough. The directory should include information on the provision of childcare, including out-of-hours provision, holiday provision, schools' breakfast clubs and after-school clubs. It should include information on eligibility criteria for that care, including advice on childcare entitlements, eligibility criteria for financial support for childcare and information on which providers accept childcare vouchers. The FIS should allow parents to enter their postcode, select the type of providers they are interested in and the geographical area they would like to search, and then be provided with a list of available care providers. The Council should make sure the FIS keeps up-to-date records of extended schools services in the borough.
- **The Council** should launch a targeted information campaign to promote the 30 hours entitlement to child care being introduced in September 2017 to maximise take-up, as well as provide information on the existing entitlement for some 2 year olds. The Council should work with its Councillors and partners such as **Children's Centres, private providers, schools, Jobcentre Plus and GP surgeries** to get the message out to parents, including those who do not have access to the internet, and those with literacy issues. Information about childcare should be routinely offered to parents who access other council services such as the housing options centre or employment support services.
- **The Council, children centres, schools, private, voluntary and independent nurseries** but also organisations such as food banks should work with **Advice Lewisham**, the network of the main free advice providers in Lewisham<sup>52</sup>, so parents are helped to access free, expert advice about benefits and their entitlements.

## Childcare provision

- **The Council** should work with **Children's Centres**, providers and parent groups to explore ways to encourage parents and extended family to participate in the provision of childcare, including by exploring options for co-operative childcare clubs, community-led and community-owned nurseries. Parents, extended family and other members of the community participating in these forms of co-produced child care can then also be supported into related careers.
- School buildings should be used for the provision of breakfast and after-schools clubs, either by **schools** providing these services directly or by schools making their buildings available for childcare provision by other providers. Parents should be encouraged to participate in the breakfast and after-schools clubs at their children's schools, which could be run as social enterprises.
- **The Council and the Early Years Partnership Board** should work closely with private, voluntary and independent nurseries, schools and childminders to increase out-of-hours provision of childcare, including encouraging flexible childminders that can provide care at short notice.

## 5. Improving the local housing market

*'We have to stay where we are because the rent that we get charged is the rent that we got charged when we first moved in because the landlord is so bad, he just leaves things... But we physically can't afford to move anywhere else because if we do, and if they accept housing benefit, they are wanting a massive deposit. Where are we going to find that?'*

**Mother and full time carer**

### Housing in Lewisham

Lewisham has relatively affordable housing compared to the London average, but the average house price is still 14 times the median salary in the Borough. Affordability is an issue across all types of tenure. The focus of the council has been to increase the number of housing units to help tackle Lewisham and London's housing crisis and the Council has exceeded its London Plan targets year on year. The Council is delivering on its commitment to secure 2,000 new affordable homes in the borough by 2018, of which at least 500 will be new Council homes, but even more affordable homes are needed.

A growing number of households in Lewisham – including those on low incomes – are in the private rented sector (PRS). The number of Lewisham residents in PRS has doubled in the last decade. Private rents in Lewisham are below the inner London average but are rising faster than elsewhere in London, increasing by 40% between 2011 and 2016. This means many tenants pay more than half their income in rent. In addition, Assured Shorthold Tenancies (ASTs) offer little security and fixed periods of as little of 6 months. Many Lewisham residents live in poor quality rental properties and may be reluctant to report problems for fear of revenge evictions.

In June 2017, there were just over 1,900 Lewisham households in temporary accommodation, less than 500 of which were in temporary accommodation. The Council has been working to increase the quality of temporary accommodation its offers by increasing the units available in the borough. This is being done by acquiring properties on the open market, converting existing properties such as a former care home and a long term empty office block, and by developing PLACE/Ladywell<sup>53</sup>. PLACE/Ladywell offers 24 modular apartments almost entirely constructed off site, and as a result built quicker and cheaper than standard construction methods. The structure sits on currently vacant Council land while longer-term regeneration plans are being developed, and can be moved to another vacant site in the borough after several years.<sup>54</sup>

Homelessness in Lewisham is largely driven by evictions from the private rented sector. The Council uses Discretionary Housing Payments (DHP) to help those affected by the benefit cap and works closely with the Lewisham Credit Union to provide bridging loans to households to prevent homelessness. In future the Council want to increase the number of households accessing housing support before reaching crisis point, and has developed a landlord licensing scheme for homes in multiple occupation above commercial premises to drive up quality in the private rented sector. Early support by housing providers for people with mental health

<sup>53</sup> <http://councilmeetings.lewisham.gov.uk/documents/s47627/04%20Temporary%20accommodation%20pressures%20250117.pdf>

<sup>54</sup> <https://www.lewisham.gov.uk/inmyarea/regeneration/lewishamtowncentre/Pages/placeladywell.aspx>

problems, where there can often be links to housing issues including worries over rent arrears and (anticipated) threats of eviction, is important as well.

However, major challenges in the housing market remain for Lewisham. Supply is a key concern as it is across London and for most parts of the UK, with housebuilding in the capital only now picking up after decades at an all-time low. The other main concern is the ability of the Council to have a positive impact on the affordability and quality of homes in the Private Rented Sector. The challenge remains for the Council to secure better outcomes for residents in the private rented sector, and prevent homelessness.

## Recommendations

### Building the homes Lewisham needs

- **The Council** should build as much social housing as possible, and continue to press national government to lift restrictions on local authorities' abilities to use their capital funding, to allow local authorities to retain Right to Buy receipts in order to invest in new social housing, and to lift the borrowing cap on the Housing Revenue Account.
- **The Council** should prioritise the building of units with more secure tenancies at rents that are affordable in relation to people's wages as opposed to units at market rent. The Council should also continue to negotiate to increase the numbers of social and affordable housing units and other benefits from developers.
- **The Council's** land should be used more ambitiously to build mixed developments at greater density and scale, recognising that most often more market-rate properties need to be developed to deliver affordable units. Joint ventures, land-sharing arrangements, community land trusts, partnerships with housing associations and new forms of ownership should all be explored. Exploring the broad range of options above will best enable the council to balance the needs of those that require new housing, particularly those on the Council's housing waiting list, with the needs of current residents. Plans should be developed in consultation with local communities.
- **The Council** should promote new types of housing, especially step-down units for older residents to ensure people that want to move to smaller properties are able to.

*'Build more social housing and retain ownership of it, lobby central government for a rent cap and ban leasehold on new builds'*

**Online Consultation**

## Influencing the Private Rented Sector

- A social lettings agency should be operating in the borough that works with mainstream landlords to offer more secure tenancies at the lower end of the market. This agency can provide a convenient way for tenants to provide feedback about the quality of rental properties in the borough. **The Council** could look to expand the work of its existing lettings agency or encourage an existing social or ethical lettings agency to operate in the borough.
- **The Council** should demand that lettings agents operating in the borough provide tenants with an information pack at the start of tenancies about their rights as tenants and how tenants can access Council services to help enforce those rights.
- A local tenants' union should be established in the borough to offer advice services, help tenants enforce their rights and organise campaigns. **Lewisham Citizens, Goldsmiths' students union** and **existing tenant and residents associations** could be asked to develop the union.
- **The Council** should consider investing in the enforcement of quality standards in the PRS to create wider changes to the behaviour of bad landlords as they perceive the risk of enforcement against them to increase. Newly introduced powers that allow local authorities to use civil penalties against landlords in breach of certain conditions could be used to fund this increased service.
- **The Council** should look into expanding the current landlord licensing scheme, and make the case to government for this.

*'Provide more advice on what people should do with rent arrears'*  
**Crofton Park Assembly**

## Preventing homelessness

- **The Council** should work to identify those at risk of homelessness at an early stage by greater use of local data and using lessons from behavioural economics to engage with residents to prevent homelessness.
- **The Council** should create a single point of contact for private landlords to discuss the implications of universal credit and to help safeguard tenants during their transition to universal credit, and proactively reach out to landlords via letting agents operating in the borough.
- **The Council** should extend its programme of developing units such as PLACE/Ladywell and acquiring properties to increase the quality of temporary accommodation it offers.
- **National government** should lift the cap on Local Housing Allowance rates which is driving up homelessness and instead tie it to median market rents.
- **The Council** should also join calls for a pause to the rollout of Universal Credit, pending a review of the system. It should call for an end to the 6-week wait for an initial payment is pushing people into rent arrears.<sup>55</sup>

<sup>55</sup> Evidence submitted to the Work and Pensions Committee's Universal Credit Rollout inquiry, Sept 2017 at: <http://data.parliament.uk/writtenevidence/committeeevidence.aspx?evidencedocument/work-and-pensions-committee/universal-credit-rollout/written/70154.pdf>

### **Regional and national policies for the Private Rented Sector**

- **Government** should consider introducing an insurance product for tenants to replace deposits. This insurance product would cover legitimate costs for the landlord up to a maximum amount in a similar way to how deposits are currently used. This would replace the need for tenants to pay expensive deposits at the start of tenancies.
- **The Council** should lobby for the Mayor of London and local authorities to have greater powers over regulation of the private rented sector. This could include powers to review developers' viability assessments; to implement rent controls; to mandate quality standards in the PRS; to make it more difficult for people to be evicted from private rental properties; and to monitor and prevent discrimination in the PRS.

## 6. Strengthening support within communities

*'We are quite lucky [on this] estate... when we get together, it's a melting pot of amazingsness. You know, everybody... if you're not good at one thing, there's always someone that is. If you need support, there's always someone that can help. If you are struggling with a situation or a bit of paperwork, there's always someone that can [do it]. That, for me, is magic and it's got me through...'*

**Mother of son with autism**

### Increasing community resilience

Strong social networks can play an important role in helping to protect people against poverty and deprivation and to mitigate against its effects.<sup>56</sup> Where people can tap into both formal and informal networks, they are more likely to be able to access goods and services such information, advice and support. They are also better able to opportunities to develop their skills, find work and to feel connected to and invested in a place. A key element of strong social networks or resilient communities is their ability to adapt to at times unexpected, changing circumstances and successfully bounce back from adverse situations.<sup>57</sup>

From speaking to residents, the Commission knows how valuable support within communities can be for people facing difficulties. Lewisham has strong communities, and a long history of civic activism. At present, there are over 800 active voluntary groups and more than 200 individual faith groups, with a recent survey revealing that 35% of Lewisham residents had volunteered over the past 12 months.<sup>58</sup>

Together, these individuals and organisations do a huge amount to support Lewisham residents in managing the challenges of poverty, particularly in areas of childcare, employment and housing. The third sector plays a particularly important role in supporting people with often multiple, complex issues. The challenge for Lewisham is how such resilient communities can be grown and supported.

<sup>56</sup> See Social networks: their role in addressing poverty, 2011 at <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/poverty-social-networks-full.pdf>.

<sup>57</sup> See RSA, Connected Communities: How Social Networks Power and Sustain the Big Society (2010: p. 47): <https://www.thersa.org/discover/publications-and-articles/reports/connected-communities-how-social-networks-power-and-sustain-the-big-society>, and CLES, Understanding community resilience (2013: p. 16) at <https://www.barrowcadbury.org.uk/wp-content/uploads/2013/11/CLES-UNDERSTANDING-COMMUNITY-RESILIENCE-2013.pdf>

<sup>58</sup> See more at: <http://www.valewisham.org.uk/blog/state-sector-survey-takeaways>



### **Whitefoot & Downham Community Food + Project (wdcfplus) case study**

*wdcfplus exists to combat deprivation, alleviate food poverty and build caring communities in its local area. Initially providing a food service for those experiencing hardship, the project now also works with other agencies to offer advice and support relating to health, nutrition, housing, employment, training and money management.*

*The project also encourages volunteering as a means for local residents to connect with others, prevent social isolation and build togetherness in the community. The project has mobilised over 50 volunteers from all sections of the community and several volunteers are former service users. wdcfplus has helped build confidence for some to enter employment and training, or it has been a lifeline for others where their benefits have been frozen or stopped.*

*One former visitor and volunteer said his time with wdcfplus was “the first time in several years that my skills were being used... The project gave me that confidence to get up and find a job”.*

By their nature, resilient communities are to a significant extent self-reliant while also being well-connected to formal organisations across public, private and social spheres. However, despite the less formal structure of many social networks, they can still be supported by public and private bodies alike. Small bits of funding, from planning obligations or by crowdfunding, and the sharing of existing facilities, such as Lewisham’s library service including the community libraries and the existing local assemblies programme, can make big differences to informal and often small groups. Public bodies can also make efforts to become better connected to existing community groups to share information and opportunities. The growing practice of social prescribing where GPs and other care professionals can refer patients to a range of local (non-medical) services may be one such way. These referrals happen alongside treatment for medical issues and exists to support people with a wide range of social, emotional and practical needs.<sup>59</sup> This can include referrals to debt advice services or legal advice as well as volunteering and befriending as ways to tackle social isolation.

Existing, more formalised, community organisations have seen significant pressures in recent years which are constraining and changing the way they operate. A significant proportion of Lewisham’s charitable sector is financially vulnerable, as many organisations have had to use their reserves in the last year, and 22% not holding any reserves. While Lewisham Council continues to prioritise community activity, cuts to council budgets have impacted its grants programme, with a reduction of 15% in 2017 alone. To adapt to this new environment, 79% of Lewisham community organisations are delivering services in collaboration or partnership, with 76% of community organisations interested in co-location should the opportunity arise.

*‘It needs to be easier for people to know how they can volunteer’*  
**Blackheath assembly**

Nevertheless, the tight operating context for community organisations means that many local charities and groups are focused on survival rather than extending their reach into the wider community or fundraising. With this in mind, a range of local partners have established

<sup>59</sup> <https://www.kingsfund.org.uk/publications/social-prescribing>

Lewisham Local, a place-based sharing and giving initiative which is a catalyst, to increase local giving and champion local involvement to encourage civil society growth.

The challenge for Lewisham Council is to find ways to improve the resilience of local communities. The borough's third sector need to make the most of different funding opportunities and increase collaboration by building on the good work already under way. Coordination of existing activities and sharing of information is particularly important in this regard. Beyond this, wider community participation needs to be supported and promoted to ensure that no individual is left behind.

## Recommendations

### Supporting community activity

- **Lewisham Local** should consider developing an anti-poverty fund to fill the current gap in micro-grants to support local community activity. This could be funded by using relevant financial contributions from planning obligations.
- A 'vulnerability audit' should be conducted by the **Community Connections Service**,<sup>60</sup> that identifies where there are 'invisible needs' and where resilience is lowest across the borough to ensure services can become more targeted towards the borough's most deprived residents.
- **Local Assemblies** should be encouraged to function as spaces in which the community sector can develop partnerships, share learning and share information on local activities.
- **Lewisham Council** should work with **Lewisham Clinical Commissioning Group (CCG)**, **Lewisham GPs** and **the borough's third sector** to enable GPs to take up Social Prescribing across the borough.

### Increasing people's access to advice and support

- **Lewisham Council** should build on its work with Go On Lewisham<sup>61</sup> to support the most deprived parts of the community gain basic digital skills by supporting and prioritising community activity which helps develop people's digital skills, with due consideration of where these services are located.
- The activities by the **borough's community sector** should be actively promoted to residents and amongst community organisations by:
  - Developing a consolidated and live register of community activity
  - Promoting Voluntary Action Lewisham (VAL) contact information in Lewisham Life
  - Promoting local community activity more in the local press

<sup>60</sup> The Community Connections Service is delivered by Age UK Lewisham and Southwark and a consortium of voluntary sector partners to increase people's wellbeing and link them to local services. More information can be found here: <http://www.ageuk.org.uk/lewishamandsouthwark/services/community-connections/>

<sup>61</sup> <https://local.go-on.co.uk/groups/34/>

## The benefits of volunteering

- **The Council** should improve and promote its employee volunteering policy to encourage council staff to volunteer in the borough's most deprived communities by working with **Voluntary Action Lewisham** and using the evidence from the 'vulnerability audit' described above. The newly launched employee volunteering policy could then be used as an exemplar for **Lewisham Local partners** to promote to businesses inside and outside the borough, and encourage best practice.
- **Lewisham Local**, working with employers inside and outside the borough, should work towards supporting people who are not ready for work into volunteering opportunities which allow them to develop transferable skills and provide training on how to communicate or translate this in practice.

## A stronger voluntary sector

- **The Council** should work with **VAL** and **Lewisham CCG** to support the borough's voluntary and community sector to access contract opportunities by organising 'meet the commissioner days' and committing to early notification when contracts go to tender.
- **The Council** should use its procurement processes to ensure that all components of the Social Value Act (2012), including community engagement, are geared towards the needs of the most deprived members of the borough. This could be achieved by:
  - Ensuring that all procurement processes are brought to the attention of the Social Value Officer in time to develop relationships with providers
  - Including statements on the social value offer of all new contracts and all decisions to go to tender in the reports used in the Council's formal decision-making processes including for its Mayor and Cabinet meetings.
  - Making community consultation and service user engagement a key component of social value

*'Coordinate and publish a list of people willing to do DIY and repair jobs for other members of the community to save money when jobs need to be done'*

**Catford South Assembly**

## Assets

- **Lewisham Council** should continue to support the local voluntary and community sector to use their assets (such as community buildings) more efficiently and wherever possible, co-locate.
- **The Council** should work to ensure that there is a good provision of community resources in new residential developments by supporting developers to work with local community organisations.

*'Stop the loss of community assets by conversion to residential'*  
**Crofton Park Assembly**

## **7. Working together to tackle poverty: next steps and implementation**

### **An immediate response**

This report will be presented to Lewisham Council's executive Mayor and Cabinet meeting in November 2017. The Commission expects Lewisham Council to adopt these recommendations and to begin implementing them as soon as possible.

### **Change across the community**

The Commission will also be asking other organisations in the borough to contribute, and we'll be writing to Lewisham and Southwark College, Lewisham Homes, Goldsmiths, Phoenix Community Housing and Lewisham and Greenwich NHS Trust to ask for their response. The Council should convene a meeting with these partners to discuss this report and the Commission looks forward to receiving their response to our recommendations. The Commission will also be writing to Voluntary Action Lewisham as the central membership organisation for charities, community groups and social enterprises in the borough, and asking VAL to distribute this report amongst their members.

### **Advising national government**

Furthermore, the Commission will be writing to:

- the Secretary of State for Work and Pensions to set out our concerns over Universal Credit and the welfare freeze
- the Secretary of State for Communities and Local Government to highlight the impact of council cuts on deprived communities
- the Housing Minister to call for changes to the LHA, to greater freedoms to borrow to invest in social housing, and for greater powers to regulate the private rented sector.

### **Staying the course**

This report contains suggestions that can be implemented quickly, such as improvements to the Council's Family Information Service and signing up to Timewise, but some will take much longer time to implement, such as the building of more social housing.

The Commission therefore requests that a lead member at the Council remains responsible for overseeing Lewisham Council's actions to tackle poverty, to ensure that these long-term changes are enacted. The Commission encourages this Cabinet Member to present a yearly report to the Council's scrutiny and executive functions so progress can be tracked.

# **Appendix 1:**

## **Listening to Lewisham's people and its organisations**

### **Our approach to consultation and engagement**

In early commission meetings, we considered data on Lewisham's population, London's economy, the housing market, child poverty in the borough, and links between poverty and health outcomes. This helped establish the commission's focus and the four core themes. We considered where we could add value to the work already being done in Lewisham, reviewed examples of best practice, and explored new approaches. We have also looked at what we could learn from the work of other commissions on fairness or equality.

We have engaged with local residents, representatives from community organisations and faith groups, partner organisations and stakeholders by:

**Lived experience paper** – Early on, we organised visits to drop-in sessions at voluntary and community organisations where officers have spoken to a small number of residents about how they experience life in the borough and how they're getting by.

**Website and online survey** – The webpage contains information about the Commission's work including papers for its meetings. There is also a survey where anyone or any organisation can submit their views, experiences and suggestions for change. The Commission's work has also been promoted via the Council's social media accounts and its Lewisham Life email service.

**Press** – A number of articles about the Commission's work have appeared in local media.

**Local Assemblies** – Local assemblies are open meetings organised per electoral ward for anyone who lives, works or learns in the borough. All local assemblies were asked to discuss the work of the commission, so residents and Councillors could contribute their thoughts on causes of poverty and their ideas for local solutions.

**Visits** – Visits have been organised for the Commission to local services such as the Council's housing options centre, a provider of employment support and a Children's Centre to speak to residents and observe provision of services.

**Young Advisors** – Members of the Commission have attended a meeting of Lewisham's Young Advisors to discuss their thoughts on poverty and potential solutions.

**London Boroughs** – All London Boroughs have been approached to provide examples of work they are doing to combat poverty or its effects, and their experiences if they had hosted a similar Commission themselves.

**Poverty summit** – The Commission organised a summit to explore the issues of poverty and its effects on residents' lives on 12 July. More than 70 people, including local residents and

representatives from community organisations and faith groups, came together to discuss the challenges facing those living in poverty in Lewisham. The summit was an opportunity for us to listen, learn and take away ideas from participants on what could be done to tackle the issues around poverty.

### **Further data and evidence**

This report has been deliberately kept brief. Papers with further evidence and data we considered can be found here: [www.lewisham.gov.uk/povertycommission](http://www.lewisham.gov.uk/povertycommission)

## Summary of comments received from residents

The following is a snapshot of the comments received from residents during local assembly meetings and from the online survey following some broad questions on poverty and living in Lewisham.

### What makes it difficult to make ends meet in Lewisham?

*'The cost of public transport'*

Grove Park Local Assembly

*'Jobs in Lewisham tend to be poorly paid'*

Blackheath Local Assembly

*'The cost of school meals'*

Crofton Park Local Assembly

*'The feeling of shame about being poor means isolated communities don't look for help'*

Grove Park Local Assembly

*'Rogue landlords and extortionate rent and fees'*

Catford South Local Assembly

*'Families being broken up and sent to other parts of the country leaves no support networks'*

Catford South Local Assembly

*'Fear of crime, anti-social behaviour'*

Evelyn/New Cross Local Assembly

*'Long term health conditions make it difficult for people to work and make ends meet'*

Crofton Park Local Assembly

*'A lack of awareness about what help is available'*

Evelyn/New Cross Local Assembly

*'There are no big businesses in Lewisham, or trades young people can be apprenticed to'*

Grove Park Local Assembly

*'Low income, parking problems and unfair tickets being issued to vulnerable groups, poor housing and ineffective pressure on poor landlords to fulfil housing requirements from single older houses'*

Online Consultation

*'Lone parents being treated as second class citizens'*

Evelyn/New Cross Local Assembly

*'It is extra hard for some – if you have a disability, if you aren't white, if you are queer – poverty isn't just about resources, it's racism, homophobia'*

Crofton Park Local Assembly

*'A high percentage of work is outside of the borough which creates transport poverty'*

Blackheath Local Assembly

*'Access to relevant learning opportunities'*

Evelyn/New Cross Local Assembly

*'We need more access to free food, and places to get healthy food'* Online Consultation

## What can you and your community do to help make it easier to get by?

*'Free to use skill sharing events to help build resilience and a more joined up sense of community. The idea being to encourage different sides of the community to help each other e.g. city lawyers and marketing professionals offering tips to community services or initiatives'*

**Online Consultation**

*'Where can I donate food?'*

**Grove Park  
Local Assembly**

*'Help people improve their diets'*

**Crofton Park  
Local Assembly**

*'We need event venues for parties, dancing and drinking for young adults'*

**Catford South Assembly**

*'We need the CAB to be free to do more campaigning'*

**Blackheath  
Local Assembly**

*'I support Lewisham Foodbank by donating food. They gave out 4850 3 days of emergency food last year. They need more publicity and support'*

**Online Consultation**

*'Coordinate and publish a list of people willing to do DIY and repair jobs for other members of the community to save money when jobs need to be done'*

**Catford South Assembly**

*'It needs to be easier for people to volunteer'*

**Blackheath  
Local Assembly**

*'Can the council help publicise the credit union?'*

**Blackheath Local  
Assembly**

## What can the Council and its partners do to help?

### Housing

*'We need real council housing – social rent'*

**Grove Park Local Assembly**

*'Build more social housing and retain ownership of it, lobby central government for a rent cap and ban leasehold on new builds'*

**Online Consultation**

*'Ensure that the housing associations that don't come up to scratch are held to account and do inspections and put pressure on them to fulfil their responsibilities, especially where tenants are being harassed'*

**Online Consultation**

*'Please ensure builders contracted by housing associations are registered with the council and therefore bound by a code of conduct - and that they are not exploited or forced labour'*

**Online Consultation**

*'Support more community led housing by making land available'*

**Crofton Park and  
Grove Park Local Assembly**

*'Do more to address the challenges of rogue landlords'*

**Catford South Local Assembly**



## Community

*'Stop the loss of community assets by conversion to residential'* Crofton Park Local Assembly

*'We need a council kite mark for approved services so people know where to go and who to trust'*  
Blackheath Local Assembly

*'Please ensure the contract for the Ladywell Tower goes to the presentation that offers the greatest community capital and not just private profit'*  
Online Consultation

## Changes to service delivery

*'We need more action on and awareness of mental health issues'* Evelyn/New Cross Local Assembly

*'People need help using IT to access services'*  
Evelyn Local Assembly

*'Provide more advice on what people should do with rent arrears'* Crofton Park Local Assembly

*'Recognise that not everything can go online – sometimes you need to speak to a person'*  
Catford South Local Assembly

*'Please ensure that where there are unclear parking restrictions resulting in penalties to people who live in those areas these are addressed as soon as possible. A specific councillor should be given the lead on investigating these issues and then asked to account about progress towards change'* Online Consultation

*'Make claiming and reclaiming benefits easier for those who have no access to the internet'*  
Crofton Park Local Assembly

*'We need more flexible care options and better transportation'*  
Evelyn Local Assembly

*'Help people get out of debt by making it clearer where to get advice'*  
Grove Park Local Assembly

## Benefits and taxes

*'A council tax relief fund would help ends meet'*  
**Blackheath  
Local Assembly**

*'Do something to stop the delay in benefits'*  
**Catford South  
Local Assembly**

*'We need to do more to reach the working strugglers'*  
**Blackheath Local Assembly**

*'Have a special council tax rate for pensioners living alone'*  
**Catford South Local  
Assembly**

## The local economy

*'Create more opportunities for adult work placements'*  
**Catford South  
Local Assembly**

*'Internationally, organisations such as LendwithCare use interest free loans provided by supporters such as me to lift people out of poverty. Could this model be adapted by councils for the UK?'* **Online Consultation**

*'We need a forum whereby residents are encouraged to meet with officials to talk about their concerns'*  
**Catford South Local  
Assembly**

*'Attract more businesses through a positive policy plan for new business'*  
**Blackheath  
Local Assembly**

*'Create subsidies or a local investment fund for new local businesses - incentives for employing local people'*  
**Online Consultation**

*'People need to be empowered to look for a job'*  
**Catford South Local  
Assembly**

*'Provide more cheap loans through the credit unions'*  
**Crofton Park  
Local Assembly**

N.B. This report contains a number of quotes from residents. All names have been anonymised.