

Direction of Travel Document

Accommodating the Bakerloo Line Extension

November 2017





*Councillor XXXX
Cabinet Member for XXXX*

Foreword

"XXXXX."

CONTENTS

FOREWORD	2
01 INTRODUCTION	4
1.1 PURPOSE OF THE DOCUMENT	5
1.2 THE CHALLENGE FOR LONDON	6
1.3 THE CHALLENGE FOR LEWISHAM	7
1.4 LEWISHAM'S ROLE IN MEETING THAT CHALLENGE.....	8
1.5 THE STORY SO FAR	10
1.6 THE BLE AND THE OPPORTUNITY	14
1.7 BACKGROUND TO THE BLE	15
02 LEWISHAM'S POLICY CONTEXT	17
2.1 THE LONDON PLAN.....	17
2.2 LEWISHAM'S DEVELOPMENT PLAN.....	17
2.3 CORE STRATEGY.....	18
2.4 LEWISHAM'S TOWN CENTRE LOCAL PLAN (TCLP)	21
2.5 PLANNING FOR THE FUTURE.....	24
2.6 WHAT WE ARE DOING TO PLAN FOR THE BLE	24
2.7 THE CASE FOR BLE PHASE 2: BEYOND LEWISHAM	28
03 ALIGNMENT WITH THE MAYOR'S GOOD GROWTH AGENDA	31
3.1 INTRODUCTION	31
3.2 A CITY FOR ALL LONDONERS.....	32
3.3 MAYOR'S DRAFT TRANSPORT STRATEGY	36
3.4 AFFORDABLE HOUSING AND VIABILITY SPG	39
3.5 MAYOR'S DRAFT HOUSING STRATEGY	41
04 CONCLUSION	43
4.1 CONCLUSION	43



Loampit Vale, Lewisham Town Centre

Image Credit: LB Lewisham

1 Introduction

1.1 The purpose of this document

1.1.1 **This document is Lewisham’s platform for supporting the BLE and growth in a BLE context. With the BLE Phase 1 route now confirmed, the Borough’s transport infrastructure network will be significantly enhanced and as such, we can now clearly set out our intentions for enhanced growth opportunities within the Borough.**

1.1.2 This document does not set out any new policies. Instead the intention is to:

- Confirm the Borough’s approach to growth is established and the aspiration to optimise this growth with the necessary, supporting infrastructure.
- Set out the Council’s aspiration to capture development opportunities associated with the delivery of the BLE and ensure that these enhanced development opportunities are managed and coordinated.
- Confirm the Council’s commitment to plan for the arrival of the BLE.
- Set the standard and promote the highest quality in all new developments
- Confirm the Council’s commitment to the delivery of genuinely affordable which addresses the Borough’s housing need.

- Demonstrate how we are reflecting the recently published key London Plan documents locally (namely the draft Transport Strategy June 2017, Good Growth by Design programme (launched July 2017) and the Affordable Housing and Viability SPD August 2017) at a local level.

1.1.3 We have produced this document in advance of our new Local Plan, for which evidence is currently being prepared. A Project Scoping and Options Paper is intended to be ready for consultation in Spring 2018.

1.2 The challenge for London

1.2.1 In 2015, London's population exceeded its historic peak of 8.6 million people. Present forecasts expect it to exceed 10 million by 2039. Land will be identified each year, until 2041, to accommodate at least 50 000 homes to meet the demands of London's growing population. There will also be an annual need to create 46 000 jobs.

1.2.2 Across London there have been many transport infrastructure projects both constructed and planned to accompany this growth. The most notable project, the Elizabeth Line, will open in 2018 and will provide an East-West link across the Capital. It will stretch for 60 miles stopping at 40 stations and will move around 2,000,000 people a year. Crossrail 2 will run from Surrey to Hertfordshire and is expected to move 270,000 additional people into central London every day, supporting 200,000 jobs and 200,000 homes. Various tube lines will also be extended along with investment in new trains and technology.

1.2.3 Addressing the current housing shortage and addressing the affordability challenge as well as meeting the projected increase in housing demand is a huge challenge. The Mayor of London has published various documents since being elected to begin to tackle the issue. The most recent document, the draft Housing Strategy, was published in September 2017 and sets out a range of measures to increase the supply of homes in London. This is achieved through his 'good growth' strategy. The Mayor is also committed to protecting London's Green Belt. His strategy focuses on intensifying housing in well-connected places, with access to good public transport such as London's identified opportunity areas and town centres. The strategy also suggests that local centres, parades and smaller infill sites have a greater role to play as well as encouraging more intensive development on underutilised sites such as single storey retail sheds.

1.3 The challenge for Lewisham

1.3.1 Lewisham's population is anticipated to grow by 20% between 2011 and 2036, where the number of households within the Borough will rise to 142 000 by 2036. To support this increase we will need to deliver at least 18,165 new homes across the borough. This will involve developing associated infrastructure such as new schools, community facilities, parks and improvements to public transport. This represents the highest level of growth and investment in the Borough for 40 years.

1.3.2 Lewisham, like other places in South East London, is heavily dependent on the National Rail network. This network is operated by Southeastern, whose franchise is due to be renewed in 2018. These services run to London Bridge, London Cannon Street, London Victoria and London Charing Cross. Thameslink also operate within the Borough, running services to London Blackfriars, Farringdon and St Pancras International stations. The London Overground network interchanges with the National Rail network at New Cross and the DLR, which terminates at Lewisham, provides connections up to Canary Wharf, Bank and Stratford.

1.3.3 The expected increase of demand to the public transport network will mean busier trains. To overcome future crowding the following enhancements will take place/ have been proposed:

- Thameslink will operate a full service by 2018 which will mean a four trains per hour service on the Catford Loops line (however this does include risks to services in the Borough to which the Council object, such as the removal of the Sydenham Corridor to London Bridge, and diversion of services on the Sydenham Line to East and West Croydon).
- The DLR's stock is being upgraded to three-car trains rather than two and the intention is to increase the number of services from Lewisham by 8 trains per hour.
- London Overground plans to increase capacity on the lines within our part of the Borough by increasing the number of trains per hour to 20 and increasing train lengths.
- Southeastern plans to increase frequency and capacity.
- The Bakerloo Line Extension to New Cross Gate and Lewisham will significantly improve Lewisham's capacity creating capacity for 65 000 journeys in the morning peak.

1.3.4 Improvements are also being proposed to the Borough's walking and cycling routes, such as the Quietway and the Cycle Superhighway to encourage alternative forms of transport.

- 1.3.5 Lewisham is also facing an affordability challenge. In Lewisham, the rise in house prices over the past 21 years has been more pronounced than in London as a whole. This rise in house prices has resulted in a rapid expansion in the number of households renting in the private sector, especially amongst younger people; in 1997 40% of people under 35 owned their own home, this figure has fallen to 13% in 2014. Over the same period 38% of under 35s privately rented whilst now this figure has risen to almost double. These rates are likely to rise given that 1 in 4 people in the borough are under 19.
- 1.3.6 There will also be a higher demand for housing that meets the needs of our ageing population. This is due to 1 in 6 people within the Borough being over 60 years old and that people are living longer.
- 1.3.7 On the basis that affordable housing should cost no more than 35% of a person's household income after tax and benefits, in Lewisham, only Social and Living Rent tenures are under 35% of the net income of the median household income in Lewisham, meaning every other tenure type is unaffordable for many people. In addition to seeking affordable housing which genuinely meets the borough's needs within private developments, the Borough is increasing its own house building programme.
- 1.3.8 Not only does the borough have to continue delivering housing but it needs to increase the supply of housing which addresses local need.

1.4 Lewisham's role in meeting that challenge

- 1.4.1 **Lewisham continues to be well equipped to meet this challenge and the Council is committed to deliver "good growth" that positively contributes to the lives of new and existing residents. Lewisham Borough is a successful and cosmopolitan part of London occupied by energetic, creative and diverse local communities that benefit from attractive residential neighbourhoods, successful local schools and a huge number of parks and green spaces.**
- 1.4.2 We have a large number of heritage assets including 27 conservation areas, 540 listed buildings and over 200 locally-listed buildings. Around one fifth of the borough is 'open space'. As such we need to ensure that this space is enhanced and efficiently used.
- 1.4.3 We have led on a number of highly successful heritage regeneration projects. For example the restoration of the Deptford Station and its environs to allow further regeneration. The scheme has seen the construction of a new station building, restoration of the Grade II listed Victorian carriage ramp and arches, two mixed use developments and the creation of a new public square. All but the station are known as being part of The Deptford Project.

1.4.4 The Deptford Project is multi award winning with its most recent accolade, 'Best Heritage Led Regeneration Scheme', being awarded at the London Planning Awards. Ten years ago, Deptford Station and the Market Yard we underutilised places which people avoided, now it is a destination and integral part of the town centre.

1.4.5 In addition to this, whilst the Borough has one of the smallest economies in London it is one of the fastest growing with a particular focus on the Digital and Creative sectors.

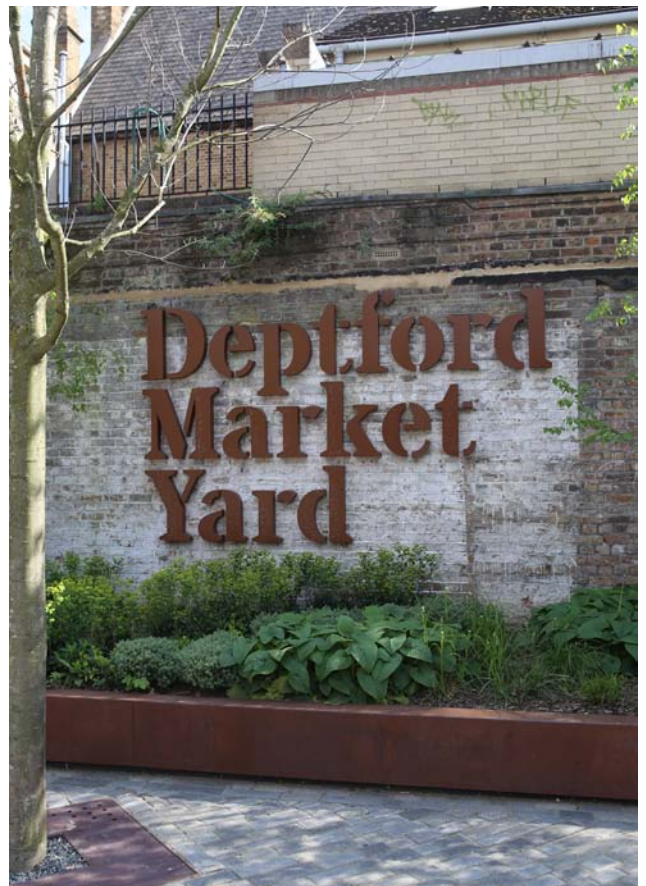
1.4.6 The Council is keen to support business growth and has developed two 'Deks' in Catford and Ladywell which have been very well received. They are designed to support local entrepreneurs and businesses to access workspace and facilities across the network, including access to free business advice and affordable finance.

1.4.7 The Council and Goldsmiths, University of London agreed a partnership in 2016 to work together to bring economic, educational and community achievement to the area. Key projects include Goldsmiths: supporting and encouraging young people and adult learners into Higher Education; and providing support to business start-ups and enterprise hubs. We are also working on various projects, such as funding a new gallery in New Cross.

1.4.8 **Lewisham has a lot to build on!**



Deptford Market Yard
Image Credit: LB Lewisham



Deptford Market Yard
Image Credit: LB Lewisham



1.5 The story so far

1.5.1 Adopted in June 2011, Lewisham's Core Strategy contains a robust spatial strategy which has been hugely successful to date. Our spatial strategy focuses on new housing, retail and employment uses within Regeneration and Growth Areas that benefit from higher levels of public transport accessibility and land that is available and deliverable. Fundamental to the achievement of this was the re-designation of five large surplus industrial sites in the north of the Borough as Mixed Use Employment Locations (MELs). They are:

- Convoys Wharf
- Surrey Canal Triangle
- Oxestalls Road
- Plough Way
- Lewisham Gateway

1.5.2 Collectively, these strategic sites, all of which fall within the designated Regeneration and Growth Areas (RGAs), will deliver a significant proportion of the borough's housing during the plan period (2011 to 2026). This also includes 100,000 m² of new and reconfigured employment floor space (light industry, workshops and offices) and 62,000 m² of new retail floor space by 2026. These sites are crucial for the regeneration of our borough. All of these sites are either under construction or have planning permission. In the year 2015-2016, 68% of the housing completions and 84% of the approvals were concentrated in the RGAs.

Cornmill Gardens

Image Credit: LB Lewisham



Plough Way

Image Credit: LB Lewisham

1,533 dwellings were constructed during 2015-16, which was the second highest completion rate in 12 years and exceeded the London Plan target of 1,385 dwellings per year by 11%. In the same period we also approved 2,371 new units.



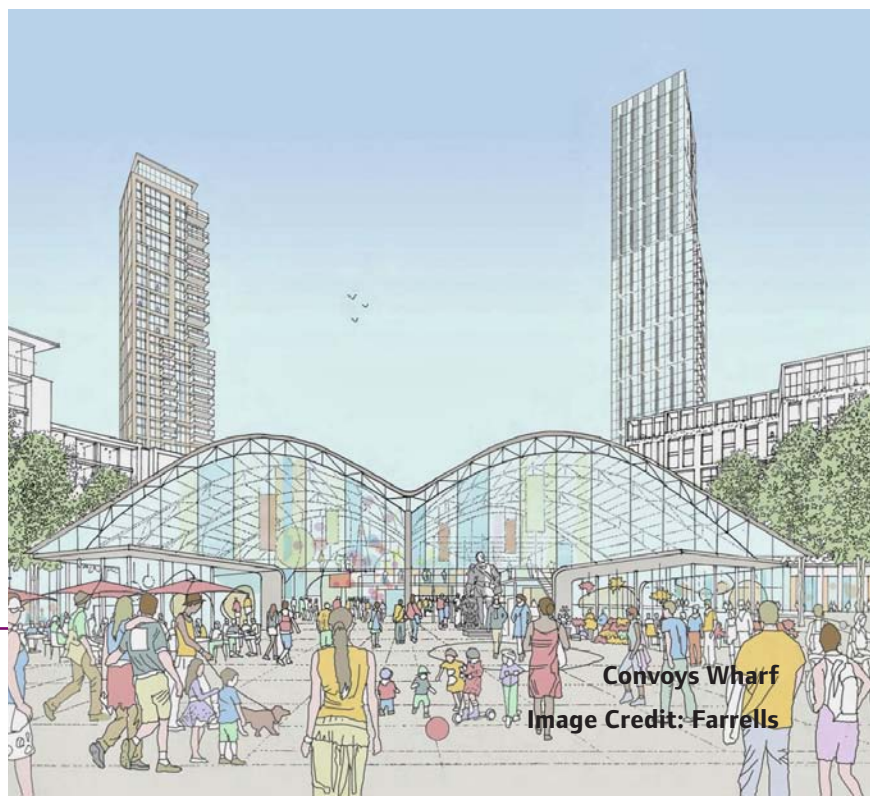
Oxetalls Road, the Wharfs

Image Credit: Hawkins Brown Architects



Lewisham Gateway

Image Credit: LB Lewisham



Convoys Wharf

Image Credit: Farrells



Ladywell Fields
Image Credit: BDP

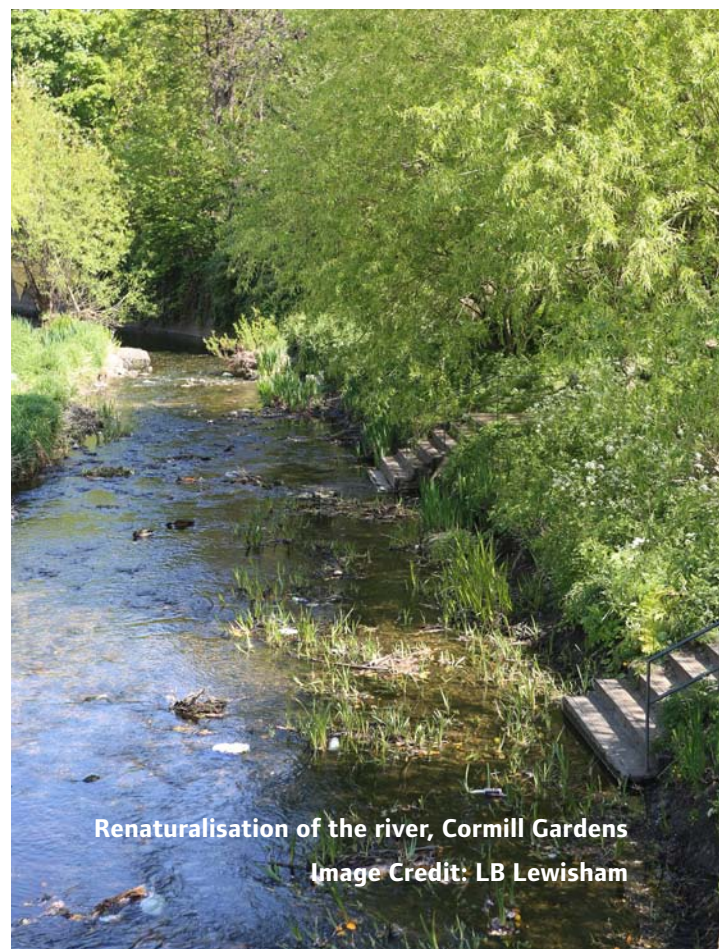


Deptford High Street Improvements
Image Credit: LB Lewisham

The borough of Lewisham is currently ninth in the country for the number of Green Flag awards given by the Keep Britain Tidy charity.



Aragon Gardens
Image Credit: LB Lewisham



Renaturalisation of the river, Cormill Gardens
Image Credit: LB Lewisham

- 1.5.3** For instance, Plough Way, where all but one of the schemes are complete, has delivered a very high quality mixed use development. It includes a canal park which has transformed the area to the benefit of the scheme's residents, visitors and businesses as well as the surrounding Pepys Estate.
- 1.5.4** To demonstrate that our spatial strategy has been effective, 1,533 dwellings were constructed during 2015-16, which was the second highest completion rate in 12 years and exceeded the London Plan target of 1,385 dwellings per year by 11%. In the same period we also approved 2,371 new units.
- 1.5.5** We have also carried out many successful improvement works to parks including: Beckenham Place Park; Ladywell Fields; Fordham Park; Pepys Park; and Mayow Park. We have also restored public access to rivers in Brookmill Park, Chinbrook Meadows, Cornmill Gardens and Ladywell Fields.
- 1.5.6** The Council (often in partnership with TfL) have undertaken streetscape improvements around the Borough. For example, some improvements can be seen in Forest Hill, Sydenham and Deptford. These works have had an extremely positive impact on the appearance of these centres and how they function.
- 1.5.7** Major developments such as the aforementioned MELs and Grinstead Road have and will support a number of transport improvements to the public transport network, pedestrian and cycling links, Controlled Parking Zones (CPZs), junctions and road safety measures. Most notably is the Lewisham Gateway development in Lewisham Town Centre. This scheme has seen the removal of the roundabout opposite Lewisham's stations and the addition of a new road layout. This has made it easier for pedestrians and cyclists to move between the Town Centre and stations and offers the potential to transform Lewisham into a truly metropolitan town centre.
- 1.5.8** In 2014 the London Overground Capacity Improvement Programme was completed when the Silwood Sidings, which is located in New Cross, came into operation. The programme increased capacity by 25% and reduced congestion by introducing five-car trains which can be stabled at the sidings.

1.6 The BLE and the opportunity

1.6.1 The Mayor of London has publicly committed this year to the delivery of the Bakerloo Line Extension (BLE) into the Borough. This has afforded us a unique opportunity.

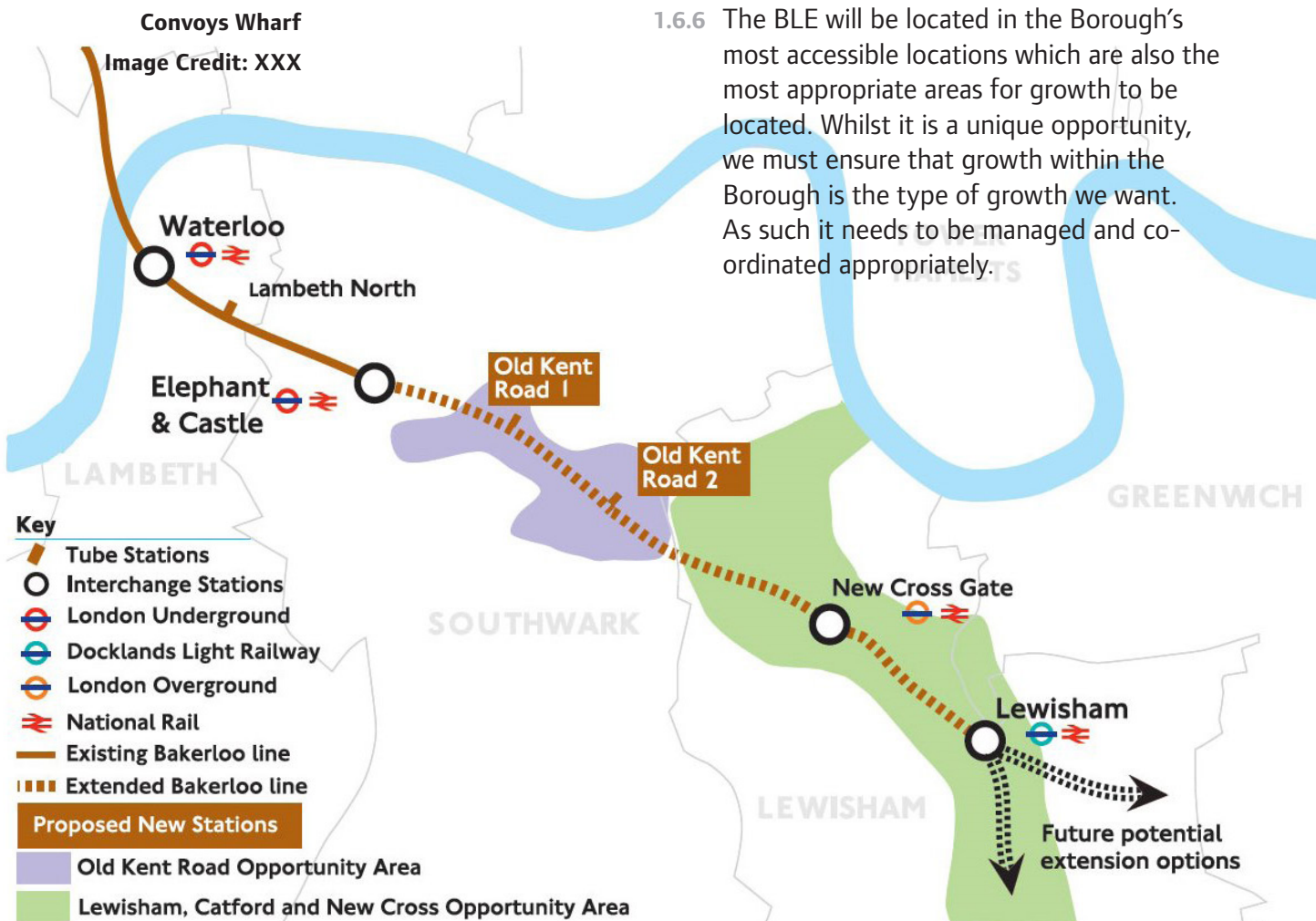
1.6.2 The Bakerloo Line will extend from its current terminus at Elephant and Castle to Lewisham Station by 2029. Within Lewisham there will be two station interchanges: the first at Lewisham; and the second at New Cross Gate.

1.6.3 The BLE will connect the borough to the Tube network for the first time in its history and will provide significant public transport capacity for new and existing residents.

1.6.4 The Mayor has identified Lewisham Station as a future interchange hub as he is seeking to enhance a number of interchanges that maximise public transport connectivity across inner and outer London. The enhancements should include integration between each of the different modes of transport and step free access.

1.6.5 We are hugely positive about what the Bakerloo Line coming into Lewisham can offer and how it can assist us to realise our growth aspirations and to meet our housing targets.

1.6.6 The BLE will be located in the Borough's most accessible locations which are also the most appropriate areas for growth to be located. Whilst it is a unique opportunity, we must ensure that growth within the Borough is the type of growth we want. As such it needs to be managed and co-ordinated appropriately.



1.7 Background to the BLE

- 1.7.1 **There has been a desire to extend the Bakerloo Line has been around since the 1930s. More recently this extension was identified as a proposal which merited further study in the Mayor’s Transport Strategy (2010) and the London Plan (2011), owing to the opportunities for new housing which were made available in Southwark and Lewisham.**
- 1.7.2 In 2014 TfL commenced stakeholder consultation on options for extension of the Bakerloo Line beyond Elephant and Castle to Hayes. As a result of this consultation and following a comprehensive analysis of the potential route options, TfL identified the best route for BLE Phase 1. This route extends from Elephant and Castle to Lewisham Town Centre, via Old Kent Road and New Cross Gate. This route will be created within underground tunnels.
- 1.7.3 In February 2017 the consultation on the BLE stations and shafts started for Phase 1 BLE. It was confirmed that Phase 1 was in the TfL Business Plan as a capital scheme. TfL and the Mayor of London publically committed to deliver a second phase of the BLE beyond Lewisham and confirmed that they would continue to build a case for it.
- 1.7.4 In June 2017, the Mayor published his Draft Transport Strategy which sets out the Mayor’s policies and proposals to reshape transport in London over the next 25 years and confirms the BLE Phase 1.
- 1.7.5 Further consultation is due to be undertaken in 2018/19 with detailed design and procurement scheduled for 2021 to 2023, construction to start in 2023 and intended completion in 2028/29
- 1.7.6 TFL have also committed to commence investigations into Phase 2 during 2018. The second phase of work will extend the Bakerloo Line beyond Lewisham further south. If a route to Hayes were chosen, the route would use existing overland rail tracks and would possibly not require further tunnelling works.



Deptford Station

Image Credit: LB Lewisham

2 Lewisham's Policy Framework

2.1 The London Plan (2016)

2.1.1 The London Plan (2016) forms part of Lewisham's planning policy framework and contains the strategy of how London should develop in order to meet the demands for housing, jobs and services. It confirms that London's population growth means more homes are needed which offer real choice for Londoners. In order to meet this need, the London Plan includes increased housing delivery targets.

2.1.2 Planning for growth is one of the central themes running through the London Plan. Given the population growth and increase in housing demand, the Mayor of London identified 38 Opportunity Areas and areas for development intensification. In the London Borough of Lewisham these are: Deptford, Lewisham, New Cross and Catford (see Appendix 1). The Council has also secured Housing Zone designations in New Bermondsey and Catford Town Centre where house building will be focused and supported by a range of financial measures.

2.1.3 The London Plan also identifies 'areas for regeneration' for prioritised neighbourhood-based action and investment in order to reduce social exclusion, these areas largely mirror our Opportunity Areas. The BLE will have a direct impact on growth opportunities in the areas for regeneration as the stations will be located within or close to many of the designated areas. It will also strengthen and support housing growth in our two opportunity areas.

2.1.4 A new London Plan is being produced and a consultation draft is expected in November 2017 with final publication in Autumn 2019.

2.1.5 The Mayor's A City for all Londoners document was the first step towards the new London Plan and sets the direction for it.

2.2 Lewisham's Development Plan

2.2.1 The Council's Development Plan contains a strategic plan for growth which remains sound and we are confident that this existing framework will enable the enhanced growth which the BLE can support.

2.2.2 The Development Plan supports growth and identifies areas and sites for the delivery of growth as well as necessary infrastructure provision and comprises a suite of documents, adopted at different times. The four main development plan documents are:

- Lewisham Core Strategy (2011) which is the Council's principle planning policy document and provides the spatial context for new developments and regeneration initiatives as well as containing strategic site allocations
- Site Allocations Local Plan (2013) which allocates sites above 0.25ha which are likely to be developed between the lifetime of the plan (2011 – 2026),
- Development Management (DM) Local Plan (2014) which contains the Council's detailed planning policies
- Lewisham Town Centre Area Action Plan (AAP) (2014) which sets out the vision, objectives, policies and delivery plan for the regeneration of the Lewisham Town Centre.

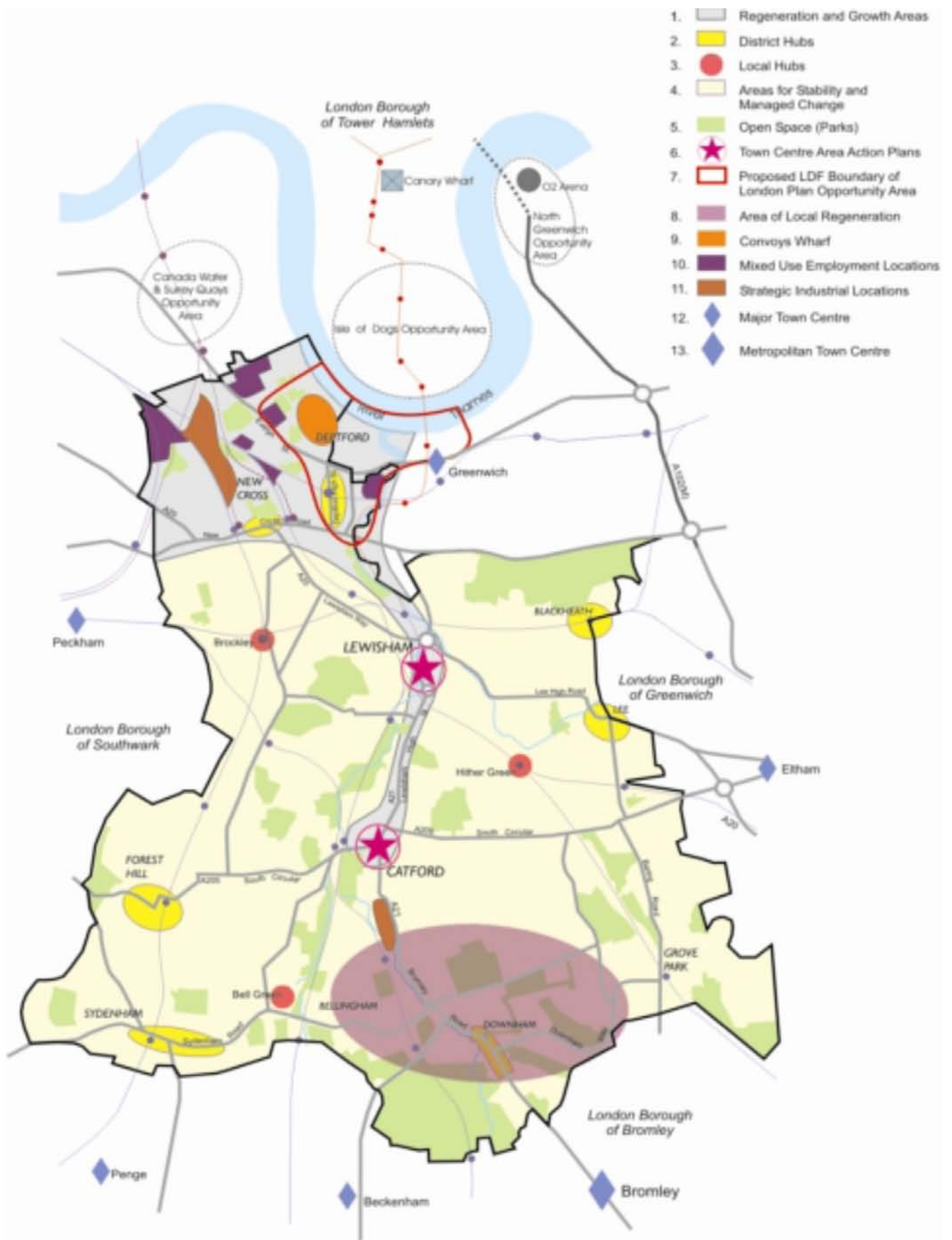
2.3 Core Strategy

- 2.3.1 Our spatial strategy, which is contained within the Core Strategy, promotes growth in designated Regeneration and Growth Areas (RGAs). These are located in an arc extending from New Cross and Deptford to Catford, including Lewisham and Ladywell (see image on page 19). However, the policies, whilst noting the need for additional infrastructure, pre-date the specific proposed BLE.
- 2.3.2 We consider that our existing spatial strategy remains sound and will facilitate growth at the scale that the BLE has the potential to deliver. The growth and transformation of the Borough in the last 10 years is testament to the success of this strategy which has delivered growth aligned with the vision and objectives within our Local Development Framework.
- 2.3.3 The spatial strategy is expected to deliver at least 18,165 new homes between 2011 to 2026 across the borough, focussed in the RGAs. The RGAs are further reinforced in the London Plan by the designation of the two Opportunity Areas in Lewisham, Catford and New Cross, and Deptford Creek / Greenwich Riverside which directly overlay the RGAs. In addition to delivering housing, these RGAs are set to boost Lewisham's economy by planning for at least 62,000 m² of retail and leisure space and 100,000 m² of new and reconfigured employment floor space over the 15 year plan period, to 2026.

- 2.3.4 The spatial strategy for the Borough is contained within two key Core Strategy policies and one from the Lewisham Town Centre Local Plan.

Core Strategy Strategic Policy 1: Lewisham Spatial Strategy

- 2.3.5 This policy requires all new development to contribute positively to the delivery of the vision for Lewisham and the strategic objectives. In addition the Spatial Strategy will be achieved by applying spatial policies in relation to the RGAs.
- 2.3.6 It also sets a minimum figure of 18,165 new dwellings that need to be delivered over the plan period and confirms that higher density development must be in highly accessible locations. Exceptions may apply where developments can ensure an increase in accessibility whilst having a restrained approach to car parking and improve cycling and walking connections.
- 2.3.7 It also seeks to protect open space and to increase the amount across the Borough, confirms that developments must be of the highest quality, sustainable design whilst protecting heritage assets and that scheme may be required to contribute to negate any adverse impacts of the development.



Spatial Policy 1

Lewisham Spatial Strategy

1. All new development will need to contribute positively to the delivery of the vision for Lewisham (see Section 4) and the strategic objectives (see Section 5).
2. The Lewisham Spatial Strategy will be achieved by applying the following spatial policies, which identify the type and quantity of development acceptable across the borough:
 - a. **Regeneration and Growth Areas** covering key localities within **Lewisham, Catford, Deptford, New Cross/New Cross Gate** (Spatial Policy 2, Section 6.2.1)
 - b. **District Hubs** covering the District town centres of Blackheath, Forest Hill, Lee Green and Sydenham, and their immediate surrounding residential neighbourhoods (Spatial Policy 3, Section 6.2.2)
 - c. **Local Hubs** covering Brockley Cross, Hither Green, and Bell Green (Spatial Policy 4, Section 6.2.3)
 - d. **Areas of Stability and Managed Change** for the remaining areas of the borough (largely residential) including a **Local Regeneration Area** focusing on parts of the Whitefoot, Downham and Bellingham wards, including the Downham District town centre and Southend Village, Bromley Road (Spatial Policy 5, Section 6.2.4).
3. Provision will be made for an additional 18,165 net new dwellings and higher density development will need to be compatible with public transport accessibility, except where development opportunities can ensure an increase in accessibility and a restrained and managed approach to car parking provision is followed, in conjunction with improvements to connectivity through walking and cycling.
4. Open space, including Metropolitan Open Land and Sites of Importance for Nature Conservation, will be protected, and a net gain of open space across the borough will be sought, particularly through on-site provision.
5. All new development will need to ensure the principles of good design are addressed, heritage assets protected, and high standards of sustainable design and construction, including maximising energy efficiency and the provision of on-site renewables and low carbon decentralised energy, are incorporated.
6. Development may be required to carry out certain works, or to provide or contribute towards the provision of measures to mitigate any negative impacts of the development, including appropriate physical, social and green infrastructure, in accordance with a planning obligation.

Core Strategy Spatial Policy 2: Regeneration and Growth Areas

- 2.3.8** This policy confirms that the RGAs will provide key regeneration and development opportunities focused in Lewisham, Catford, Deptford, Deptford Creekside and New Cross/New Cross Gate. Schemes will capitalise on public transport accessibility and the availability of deliverable and developable land, particularly through intensification of land uses in town centres and within mixed use employment locations.
- 2.3.9** In regard to the delivery of the BLE itself the policy states that ‘the Council, working with its partners, will secure the necessary infrastructure to support the planned levels of growth and will maximise the physical, social and environmental regeneration opportunities new development will bring for the benefit of existing and future residents, to address deprivation issues, particularly health inequalities, to improve well-being.’
- 2.3.10** It also states that the RGAs will be the prime location for new development comprising at least 14,975 new homes, 100,000 m² of employment floor space and 62,000 m² of new retail floor space by 2026.

2.4 Lewisham Town Centre Local Plan (TCLP): Spatial Strategy

Policy LTC2: Town centre boundary

- 2.4.1** This policy seeks to ensure that development positively contributes to the delivery of the vision and objectives for Lewisham Town Centre. Development must conform with and implement this spatial strategy and proposals must demonstrate this. It also requires for schemes to take account of the current, emerging and future context of the site and surrounding area and that proposals do not detrimentally affect the successful implementation of other nearby sites or their ability to meet the LTCLP vision or objectives. The policy also requires that each site is master-planned, address how it relates to the wider area and where appropriate must include a master-plan across multiple sites to demonstrate a schemes acceptability.
- 2.4.2** Other relevant policies in the Core Strategy and Lewisham TCLP are listed in Appendix 2

Spatial Policy 2

Regeneration and Growth Areas

The Regeneration and Growth Areas will provide key regeneration and development opportunities focused on the localities of Lewisham, Catford, Deptford, Deptford Creekside and New Cross/New Cross Gate. In giving effect to the London Thames Gateway and the London Plan Opportunity Area designations, this strategy area will capitalise on public transport accessibility and the availability of deliverable and developable land, particularly through intensification of land uses in town centres and within mixed use employment locations.

The Council, working with its partners, will secure the necessary infrastructure to support the planned levels of growth and will maximise the physical, social and environmental regeneration opportunities new development will bring for the benefit of existing and future residents, to address deprivation issues, particularly health inequalities, to improve well-being.

The Regeneration and Growth Areas will support the creation of a more sustainable borough by being the prime location for new development comprising at least 14,975 new homes, 100,000 square metres of new and reconfigured employment floorspace (light industry, workshops, offices), and 62,000 square metres of new retail floorspace by 2026.

Lewisham Town Centre will:

1. be designated as a Major town centre, and will be further developed so that by 2026 it achieves Metropolitan status on the London-wide retail hierarchy and continues to contribute to the local night-time economy
2. accommodate up to 40,000 square metres of additional retail floorspace and 4,300 square metres of additional leisure floorspace by 2026
3. accommodate up to 1,500 additional new homes by 2016 and a further 1,100 additional new homes by 2026
4. contain a Local Employment Location (LEL) at Molesworth Street
5. be one of the borough's preferred locations for new office development
6. contain a strategic development site, the Lewisham Gateway, which will act as a catalyst for regeneration of the town centre.

The Council will prepare an area action plan for the Lewisham Town Centre to ensure the forecast growth is managed and delivered. The area action plan is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major opportunity sites within the town centre.

Spatial Policy 2

Cont...

Catford Town Centre will:

1. be designated as a Major town centre with new development seeking to maintain and enhance its status, to secure its physical regeneration and ensure its continued contribution to the local night-time economy
2. build on its role as the civic heart of the borough
3. accommodate up to 22,000 square metres of additional retail floorspace by 2026
4. accommodate 650 additional new homes by 2016 and up to 1,100 additional new homes by 2026
5. be one of the borough's preferred locations for new office development.

The Council will prepare an area action plan for the Catford Town Centre to ensure the forecast growth is managed and delivered. The area action plan is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major opportunity sites within the town centre.

Deptford, Deptford Creekside, New Cross/New Cross Gate area will:

1. accommodate up to 2,300 additional new homes by 2016 and a further additional 8,325 new homes by 2026
2. support a vibrant network of town centres with Deptford and New Cross/New Cross Gate designated as District town centres, the location for major new retail and leisure development within this area, including their contribution to the local night-time economy
3. contain Neighbourhood local shopping centres at Evelyn Street and Lewisham Way
4. support smaller-scale local retail uses on site where larger scale redevelopment occurs
5. contain four strategic development sites (Convoys Wharf, Surrey Canal Triangle, Oxestalls Road and Plough Way) which will act as a catalyst for regeneration of the area
6. support regeneration and growth through the redevelopment of designated underutilised employment sites for a mix of uses including residential and a significant element of employment space, at Mixed Use Employment Locations (MELs)
7. contain a core supply of defined employment land at Surrey Canal which will be designated a Strategic Industrial Location (SIL) in the London context and will only be used for employment and waste uses, capable of meeting the requirements of the London Plan for land that will meet the need to maintain the industrial and commercial functioning of London as a whole
8. contain Local Employment Locations (LELs) at Evelyn Street, Lewisham Way and Lower Creekside in order to provide local employment opportunities and, in the case of Lower Creekside (Deptford), to ensure the retention of the creative industries
9. retain a scattering of other small business premises where viable
10. use development opportunities to improve connectivity throughout the area for pedestrians and cyclists and provide new accessible public spaces and contribute to improving the relationship with the River Thames
11. contain a new railway station at Surrey Canal Road as part of the East London Line extension (London Overground)
12. contain further and higher education facilities at Lewisham College and Goldsmiths College (University of London).

2.5 Planning for the future to ensure we capture development opportunities associated with the delivery of the BLE

2.5.1 The BLE project will inevitably mean that there is increased interest in development in the Borough. We are looking ahead and planning for the future to ensure that the enhanced development opportunities which the BLE will enable are brought forward in a managed and coordinated way. We want to work with developers, landowners and other partners to deliver growth which is good for the Borough. In order to achieve this it is important that we set out what we are doing to prepare for the BLE's arrival and what type of growth we want.

2.6 What are we doing to plan for the BLE?

Working in partnerships

2.6.1 Working with the Greater London Authority, TfL and London Borough of Southwark to ensure that the growth anticipated along the route of the BLE is delivered in a coordinated approach and that strategies do not stop at borough boundaries.

2.6.2 **Growth Partnership** - The Council is currently working in a formal partnership with the GLA, TfL and LB Southwark, dealing with regeneration, transport and planning work-streams along the Bakerloo Line Extension corridor. In order to make the most of this opportunity it is important that we have established a plan that clearly sets out how benefits will be achieved.

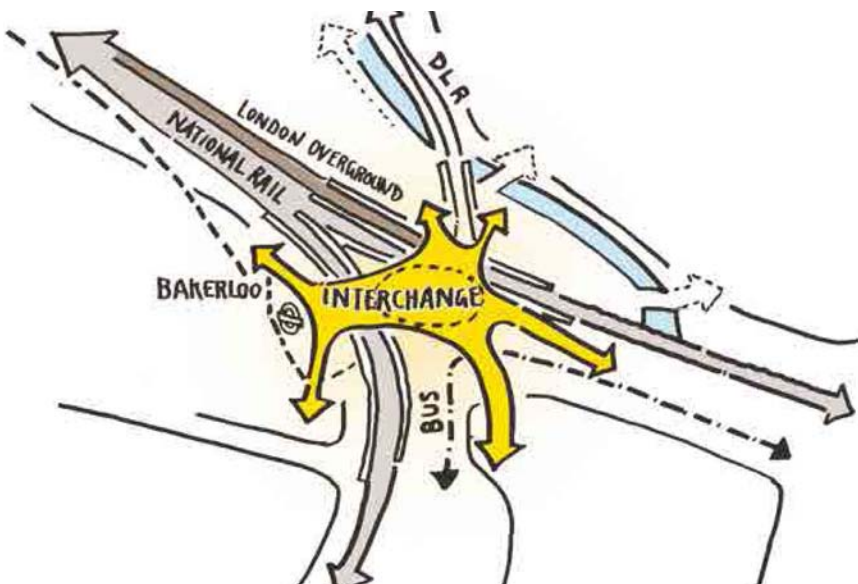
2.6.3 **Old Kent Road, New Cross and Lewisham Working Group** - Officers from Lewisham and Southwark meet on a regular basis with Officers from the GLA and TfL.

Lewisham Interchange Study

2.6.4 We are in the final phases of a detailed study which tests the feasibility of transforming Lewisham Station into a holistic transport hub providing interchange between the BLE, DLR and National Rail services. The study is being undertaken by award winning architects Studio Egret West and Atkins with a multi-headed client team of London Borough of Lewisham, Greater London Authority, Network Rail and Transport for London and has been jointly funded. The aim of the project is to create a station interchange which brings together the multiple transport modes and overcomes the severance issues of the existing station. It also proposes to better link the station (through improved cycling and walking routes) with existing and future communities and to create connections between existing areas of open space.



The main aim of the new interchange is to overcome the barriers created by the local infrastructure, by providing a new publicly accessible platform which connects across to all the neighbourhoods unlocking the potential of surrounding sites.



Lewisham Interchange
Image Credit: Studio Egret West



New Cross Gate Station
Image Credit: LB Lewisham



Goldsmiths
Image Credit: LB Lewisham

the A2, is one of London's oldest roads and cuts through a fine grain of characterful buildings. It the spine to New Cross, and the lifeblood to the local economy. As such the A2 has to be transformed from a trafficed route to move through to a pleasant high street to dwell



Route 1, Fordham Park
Image Credit: LB Lewisham



Town Hall
Image Credit: LB Lewisham

Lewisham Tall Buildings Study

- 2.6.5 As Lewisham Town Centre develops, it is essential that we continually review the emerging urban fabric to ensure that development is meeting our Local Plan objectives. As part of this review the Council is updating our evidence base for tall buildings by providing a more granulated review focused on Lewisham Town Centre.
- 2.6.6 The objective of the study is to provide a methodology for determining the appropriate scale of development within the town centre. It sets out a robust methodology and rationale for analysing the suitability of individual sites within the town centre for tall buildings and also what constitutes as 'tall' within those contexts. It is intended that this will set the framework for the preparation of tall buildings strategies for our other centres within the RGAs including New Cross, Deptford and Catford.

Tall Building Guidance

- 2.6.7 This is a document which will support the Lewisham Tall Buildings Study. It is currently in draft and is intended to advise on any scheme involving a tall building. It will provide guidance on design, master planning, the rationale which must be provided and the documentation which must be provided to support a proposal.

New Cross Master Plan and Station Study

- 2.6.8 We are currently working with GLA and TfL on a jointly funded project to understand the impact of the Bakerloo Line Extension (BLE) on a New Cross Gate Master Plan and Station Opportunity Study (NXG Master Plan Study).

- 2.6.9 The Master Plan will cover an area of approximately 1km radius around New Cross Gate station and will look at the opportunities the BLE offers to New Cross as a place whilst looking to protect its existing character as well as exploring the benefits that the BLE can provide for existing and future residents. These include:

- Identifying the appropriate nature of development on key development sites identified within the Core Strategy adjacent to New Cross Gate Station
- Identifying opportunities for improvements to the A2 Old Kent Road-Deptford corridor
- Securing environmental improvements by enhancing the public realm and mitigating the impacts of traffic
- Understanding the local economy with a view to consolidating and improving employment opportunities in future development scenarios
- Improving the retail offer
- Looking into the mix of residential, employment, retail and social infrastructure
- Facilitating the growth of key assets within the area including Goldsmiths University, Lewisham College and the creative industries.

A2 Corridor Study

- 2.6.10** This study is being undertaken by TfL with the involvement of Lewisham officers. The study area stretches from the borough boundary with Southwark to Deptford High Street. It focuses on issues related to the roadway with particular focus and more detailed studies being undertaken around the stations of New Cross and New Cross Gate.
- 2.6.11** TfL's approach will be in line with the Mayor's Transport Strategy and the Healthy Streets philosophy. It will put sustainable modes of transport such as walking, cycling and public transport ahead of general traffic and thus seek to improve the place function of New Cross road and improve air quality.

Rail Vision

- 2.6.12** A Rail Vision for Lewisham has been published. It explains that the borough is one of two halves, the north west of the borough has many rail links and frequent services on DLR, National Rail and Overground and the south east of the borough has sparse rail network, with the Whitefoot area having no rail access at all.
- 2.6.13** Frequent services call at the main interchanges at New Cross Gate, Lewisham, Grove Park and Catford. National Rail services provide radial out to these stations from Central London. Overground and DLR routes provide north-south orbital links to East London. East-west services are limited to infrequent services across the north of the borough calling at Nunhead, Lewisham and Blackheath.

LIP3 Transport Strategy

- 2.6.14** 2.4.13 The Borough's Transport Strategy is being drafted which sets out our transport strategy for the next 30 years.

2.7 The case for BLE Phase 2: Beyond Lewisham

- 2.7.1** The Council are fully supportive of a Phase 2 extension beyond Lewisham to Catford and Hayes. Extending the BLE to Catford would support Catford's Housing Zone status and would be a driver for economic growth within the town centre and for regeneration in the surrounding areas.
- 2.7.2** Phase 2 of the BLE would be hugely beneficial for the Borough's more southerly communities, and the growth of London as a whole. The Council therefore considers the business case for such an extension to be very strong as the bulk of the infrastructure costs are in the Phase 1 tunnelling.
- 2.7.3** The Mayor of London has proposed in his draft Transport Strategy to look at the feasibility of a Phase 2 extension beyond Lewisham station to serve Hayes in 2018. The Council continue to seek commitment from TfL to further develop Phase 2 to Catford and beyond.
- 2.7.4** A number of work streams are underway or have been completed which support the case for Phase 2, although some of these have been primarily undertaken following Catford's designation as a Housing Zone:

Catford Station Interchange Study

2.7.5 2.4.18 The Council engaged Gensler to undertake a Catford Stations interchange study which is now complete. This study demonstrates improvements to station interchange, public realm improvements and potential development on adjacent sites.

Capacity Study of Wearside Depot

2.7.6 This site has been earmarked by TfL as a shaft site and could be the location of BLE Phase 2 portals. Whilst a shaft on the site would have a limited impact on the site's development potential, use of the site for portals would be likely to make this site undeliverable.

2.7.7 However to understand the potential of the site (and assuming the Council's depot functions can be moved elsewhere) a capacity study has been carried out by Allies and Morrison to look at its comprehensive redevelopment.

2.7.8 We are also:

- Revising our Local Requirements List to capture the new requirements coming out of the Affordable Housing and Viability SPD in regard to viability assessments.
- Continuing to make our case to TfL to explore options for re-zoning Lewisham stations for the benefit of residents.
- Pressing for information in regard to the preferred shaft site identified by TfL at Alexander Cottages, Lewisham and in regard to the shaft site and possible portals location at Wearside Depot, Ladywell

- Preparing a full response to TfL in regard to the BLE Consultation for which an extension has been agreed whilst further information is being provided.



Catford Green

Image Credit: LB Lewisham

3 Alignment with the Mayor's 'Good Growth' agenda.

3.1 Introduction

3.1.1 **The Mayor's position on what constitutes as 'good growth' and the recognition that growth within existing communities has to be positive for both new and existing residents is something that Lewisham has promoted for many years through our existing planning policy.**

3.1.2 The Mayor has recently published the following key documents which are relevant to our approach to growth and development within the Borough:

- A City for all Londoners November 2016
- Draft Transport Strategy June 2017
- Affordable Housing and Viability SPG August 2017
- Draft Housing Strategy September 2017

3.1.3 Lewisham's existing policies and growth strategy is well aligned with this overarching vision and the strategies within these documents. We welcome the strategies they set out and the fact that they provide clarity and support on a number of key challenges and issues facing Lewisham as a borough and London as a whole. We set out below how these documents support the BLE and set our approach to growth which is based around the themes in the Mayor's recently published documents.

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3.2 A City for All Londoners

3.2.1 This document is the Mayor's manifesto for growth and confirms his pro-development approach. It looks at how we can address competing needs for land and where development should be concentrated.

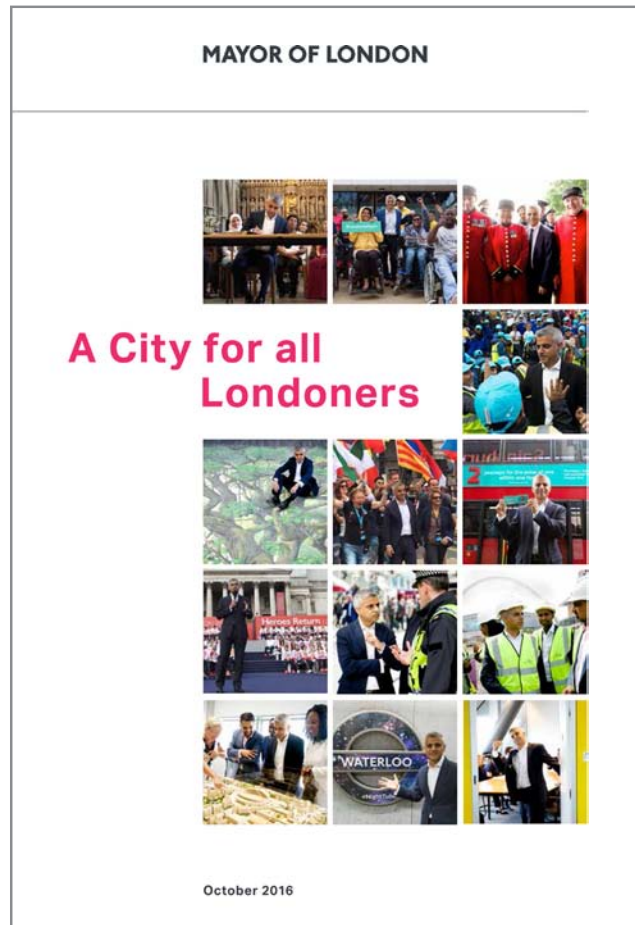
Ensuring growth is good growth

3.2.2 'A City for All Londoners' seeks that growth is properly planned and coordinated within areas which have access to good public transport and new and existing amenities. The growth associated with the BLE will be in already accessible areas that are close to existing stations (which will in the future be new interchanges) and within designated RGAs areas such as New Cross, New Cross Gate, Deptford, Lewisham and Catford.

3.2.3 We expect developments to be sustainable and of the highest design quality which does not just mean in their appearance, but also in terms of the quality of accommodation and the public realm around the building/s.

Ensuring we have the right supporting infrastructure for people and communities

3.2.4 The BLE will mean an increase in growth levels which will necessitate a commensurate increase in the supporting infrastructure (schools, doctor's surgeries, nurseries etc). This will ensure that Lewisham will function and prosper as a place, meets local needs and to be sustainable. We are currently planning for the delivery of the infrastructure required in the borough taking into account the level of expected growth through the Council's Infrastructure Delivery Plan (IDP) which is being reviewed at present.



3.2.5 Investment in social, physical and environmental infrastructure will be necessary which means securing sufficient funding from the public and private sector for infrastructure at the local, neighbourhood and strategic level. We will therefore seek payments through planning obligations and CIL, with the CIL charging schedule currently being reviewed.

Access to good homes and jobs

3.2.6 The London Borough of Lewisham currently has one of London's smallest economies but this is changing. Lewisham's Business Growth Strategy shows that there has been a huge increase in the number of active businesses in the borough and that growth has been almost exclusively in micro businesses. We are seeking to build on this growth and encourage a mix of business sizes and types that reflect the diversity of the borough and its citizens in order to create a dynamic, prosperous and sustainable economy.

3.2.7 We are undertaking various strands of work to understand our town centres and commercial businesses and we are currently involved in a number of studies; for example retail assessments of each centre and a Creative and Digital Industries Study. We also engaged consultants AECOM undertake an Employment Land Study in 2015 as evidence for the Local Development Framework to assesses the quantity, quality and viability of the Borough's employment land.

3.2.8 We are also developing more DEKs which are already established in Ladywell and Catford, and at present a scheme is being developed for Deptford.

3.2.9 As well as creating the right environment for business to flourish, the Council recognises the importance of enhancing access to employment opportunities located within the wider London region for existing and future residents of the borough. The arrival of the new BLE stations at New Cross Gate and Lewisham will mean better transport links and connections for customers, workers and business with trains every 3 minutes as well as shorter journey times between destinations.



Goldsmiths
Image Credit: LB Lewisham



Ladywell dek
Image Credit: LB Lewisham

3.2.10 When proposing employment or retail space we expect it to be fit for purpose and designed to be flexible and future proofed. Proposals which include any type of non-residential space must be able to demonstrate this. We also seek, where possible and in schemes where commercial space is required, that some of this space is affordable. In order to be able to design the space optimally to have already engaged an end user is often best as they are aware of what their requirements for refuse, servicing, etc, are.

3.2.11 Lewisham has a total of 107.3 ha of industrial land and the total industrial floor space is estimated to be in the region of 386,000 m². Of this total, 35% is Strategic Industrial land. Our Employment Land Study demonstrated that most of our Strategic Employment Land (SIL) is functioning well with 'core' or 'wider' industrial uses and they were judged to have the key strategic characteristics required by employment land which. Two sites were found to have impacts on neighbouring residential areas/ sensitive land uses - Mercury Way Waste Sites and Trundleys Road /Apollo Business Centre. All other SIL sites are afforded the highest level of protection through our policies.

3.2.12 In New Cross, growth is expected to focus on the creative, digital and cultural industries and Lewisham's expansion is expected to be in all sectors although more focussed on traditional office and retail based employment.

Green growth

3.2.13 Twenty percent of the Borough is open space and alongside housing growth we are seeking the improved connection to, retention of and enhancement of these spaces. Housing growth means more people will want and need access to open space and if we are designing at higher densities it is essential that open space is of good quality and is well connected to developments and places.

3.2.14 All schemes submitted to us should demonstrate how they link into existing connections to open spaces or create new ones, provide high quality landscaping and public realm, design external space so that users are not harmfully affected by poor air quality and that the building is energy efficient.

3.2.15 Other strategies to bring forward cycling and walking routes (as set out in the Mayor's Healthy Street strategy and North Lewisham Links) can connect to the BLE to create a much stronger, greener, more sustainable infrastructure system in that part of the Borough.

3.2.16 When looking at sites around New Cross and Deptford the 'North Lewisham Links' document produced originally in 2007, updated in 2012 should be considered. It is a programme of works aiming to improve walking and cycling routes across Deptford and New Cross in order to encourage residents to live more active lives and make better use of local amenities and public transport.

3.2.17 We also expect all schemes to address other issues which ensure 'green' development such as the provision of living roofs, sustainable urban drainage systems and electrical vehicle charging points.

3.2.18 We consider that retaining and enhancing the Borough's trees to important to its attractiveness but also to protect from climate change, retain biodiversity, provide sun shading to streets and improve air quality. One of the Mayor first commitments was to plant 10 000 trees across London, in partnership with businesses and the public sector. He has also launched a fund for tree and woodland planting in London in Autumn/Winter 2017 called the new Greener City Fund.

The night time economy and culture

3.2.19 The Mayor has created the London Night Time Commission in order to develop London's night time economy. This sector employs 1 in 8 people in London and is a key driver for tourism, culture and economic regeneration.

3.2.20 When the BLE is complete, Bakerloo Line trains will run throughout the night at the weekends into Lewisham and New Cross. This will mean that residents or workers in the night time economy can get home safely and quickly. In some cases their journeys will be cut by almost an hour as people can use the tube rather than the night bus. The Night Tube will also open up opportunities for our night-time economies in as it will make our bars, live venues, night clubs, restaurants and other uses easier to get home from.

3.2.21 We recognise that there are opportunities to strengthen and enhance the night time economies and cultural offer in our main centres and we are currently to commencing work on strategies to which will help us achieve that.

3.2.22 In New Cross we are working with Goldsmiths, University of London (who are a key stakeholder in the area) to understand how to enhance the existing night time economy. Goldsmiths have a vested interest in the Borough, especially as they have a large student population in New Cross and Deptford which they are seeking to expand. They have the Borough's only cinema within their campus and they make a significant contribution to the cultural offer of New Cross through exhibitions etc.

Changing the way we travel

3.2.23 To create a greener and healthier Borough Lewisham fully supports the extension of the Bakerloo Line into the Borough as it will provide additional capacity on the public transport network to reduce overcrowding. This will encourage people out of the car and onto public transport. This in turn will improve the Borough's air quality, particularly along New Cross Road. We are also developing a 'Rail Vision' for Lewisham which will assess capacity, quality of stations, access to stations and rail connectivity.

3.2.24 We have also developed strategies to encourage walking and cycling such as the 'North Lewisham Links' and fully support other initiatives such as the Cycle Superhighway which will run along Evelyn Street. This approach aligns with the London Mayor's Healthy Streets London aims to get Londoners to reduce their reliance on driving by making better and safer walking and cycling routes and public spaces and connecting new developments to local services. This in turn will improve the people's health, revitalise shopping parades, reduce air and noise pollution and improve mental health.

3.3 Mayor's draft Transport Strategy

3.3.1 The Mayor's draft Transport Strategy was published in June 2017 and it sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years. It is a statutory document and it builds on the Mayor's vision for a better London that was outlined in A City for All Londoners and takes forward the approach set out in Healthy Streets for London.

Recognition and commitment for the BLE phase 1

3.3.2 This document schedules the BLE as part of a programme being delivered of station capacity improvements to complement line capacity enhancements and to improve the overall public transport journey experience in London.

3.3.3 Our Core Strategy confirms that the Council 'will work to ensure the delivery of transport infrastructure and service improvements within the Regeneration and Growth Areas' which also include the improvement of railway stations at New Cross Gate, New Cross and Lewisham as well as and interchange improvements at Lewisham.

3.3.4 A positive holding response to the BLE Consultation in support of the proposed station and shaft locations was submitted in April 2017.

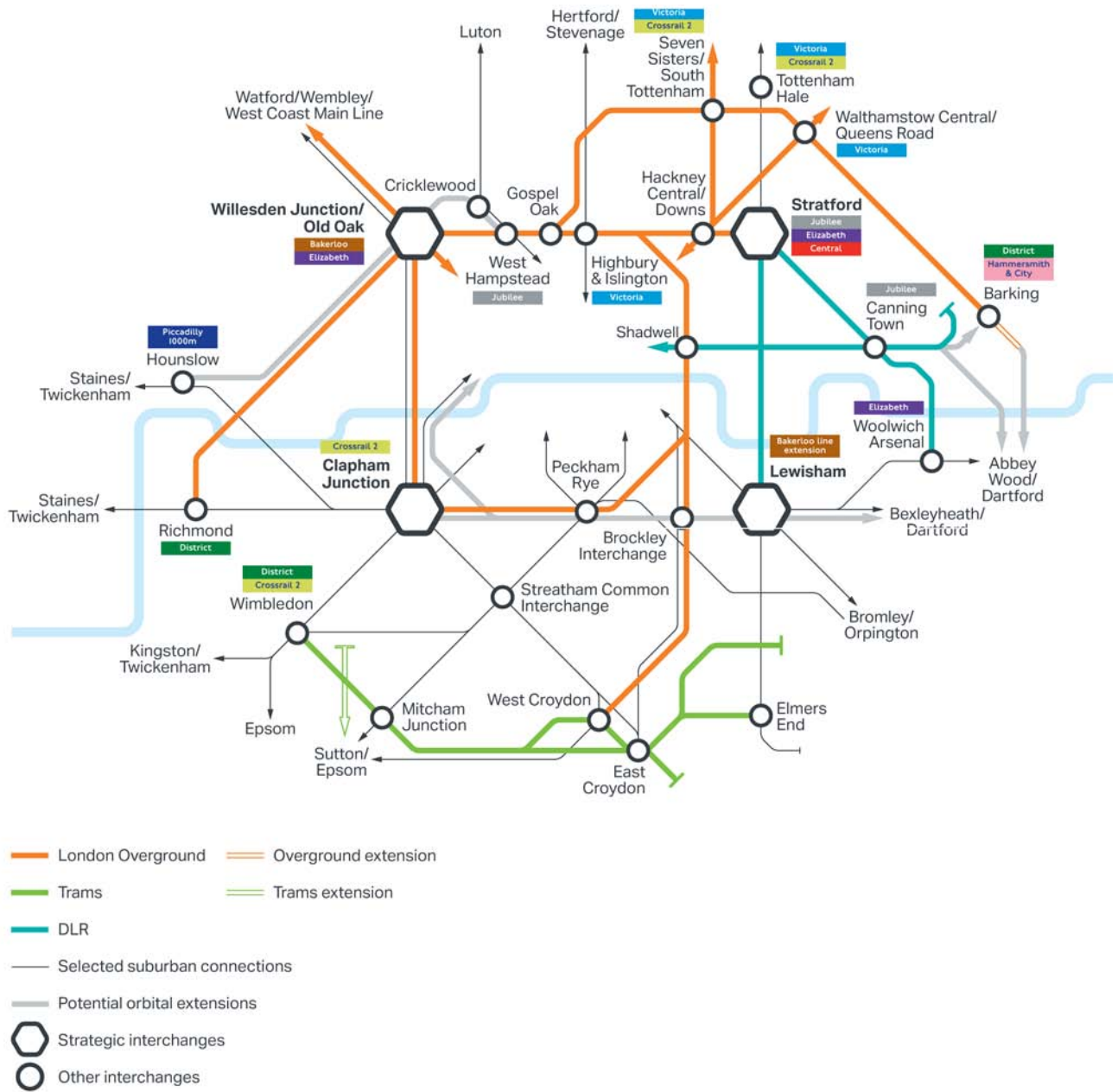
Recognition of Lewisham as a key interchange

3.3.5 The draft Transport Study recognises Lewisham station as a key transport hub. Lewisham station is a Strategic Interchange where many modes of transport connect and it enables passengers on radial services into London to change onto an orbital link rather than travelling through the centre of London.



3.3.6 The station at present is disconnected from the town centre and essentially operates in two parts: that serving the DLR and; that serving National Rail. We recognised that Lewisham needed a well-designed, highly functioning station interchange and engaged renowned architects Studio Egret West and multi-disciplinary engineering firm Atkins to undertake a study to create a holistic interchange addressing various issues with the current station and its connection to the existing communities and places.

3.3.7 The Council will continue to work with the GLA, TFL and Network Rail to deliver on those aspirations and develop an integrated station befitting of Lewisham Town Centre's growing status within the South East.



Potential mini-radial hubs and improved orbital rail links in inner and outer London

Image Credit: GLA

The need for developments to contribute financially to the BLE

- 3.3.8 In order for the BLE to be realised it will need to be funded through various funding streams. Some funding has to come from development and as such the Council will require specific contributions from developments within a 1km radius of either proposed BLE station to contribute to the construction of the station interchange. A 1km distance is considered to be within reasonable walking distance and therefore schemes would benefit directly from it.
- 3.3.9 We are working with GLA and TFL to secure and commit necessary funding for the transport infrastructure and associated public realm works for this project. We are also seeking that Mayoral CIL and Local CIL contribute to the financing of the BLE.

Mayoral CIL

- 3.3.10 Lewisham has recently responded to the consultation on the Preliminary Draft Charging Schedule for Mayoral CIL 2 (MCIL2), a charge targeted at developers to help contribute towards strategically important transport infrastructure. In the consultation documentation it refers to MCIL2 being for Crossrail 2 and other strategic transport projects. Lewisham consider the BLE to be a strategic transport project as it will create a cross-London rail link from south-east to north-west. As the BLE Phase 1 is highlighted as critical in the London Infrastructure Plan 2050, and contained within the London Plan, officers therefore consider it should be considered for funding from the Mayoral CIL. MCIL2 is scheduled to be levied in April 2019.

Local CIL

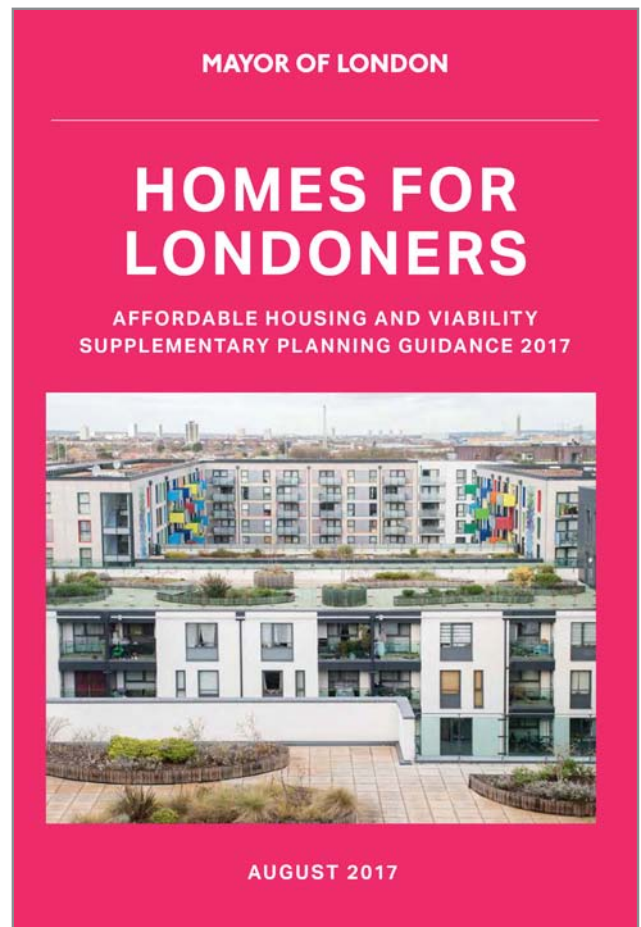
- 3.3.11 Lewisham's Local CIL Charging Schedule is currently being refreshed to reflect changes in property values and build costs. We will be looking to capture some of the uplift in land value that arise from the BLE and to help fund essential infrastructure. As part of this, the Regulation 123 list is being redrafted to reflect the works proposed as part of the BLE, and in the interim, we have started to update the Planning Obligations SPD to help capture infrastructure contributions while the final Local CIL is being adopted.

3.4 Affordable Housing and Viability SPG

- 3.4.1 The main aims of this SPG is to increase the number of affordable homes delivered through the planning system. The SPD provides a consistent and transparent approach to the viability process and will increase the level of scrutiny that the appraisals are subject to. It also seeks to embed the requirement for affordable housing into the value of land.
- 3.4.2 Between 2011- 2017 Lewisham has also seen a 96% increase in number of people in temporary accommodation and at the same time there has been a 44% reduction in the accommodation available to house them. The Borough now has over 500 households currently in temporary accommodation and has over 9,000 households on its waiting list for homes.

Our approach to affordable housing

- 3.4.3 Our adopted policy requires 50% affordable provision unless viability indicates otherwise and it remains the starting point for all negotiations on schemes which propose (or are capable of providing) over 10 residential units. In line with the Affordable Housing and Viability SPD we will only require a viability assessment to be submitted if less than 35% affordable housing is being proposed and in those cases we will also publish the applicant's viability report online, unless it can be demonstrated that it is exempt under EIR.



- 3.4.4 If changes are proposed to the design of an approved scheme or to the materials which change assumptions made in the original viability assessment then we will require a new viability assessment to be submitted and in cases where a viability assessment was not required (i.e. in cases which proposed 35% or more affordable) a viability assessment will be required.
- 3.4.5 In terms of tenure mix, our policy position is to ensure a mixed tenure and we promote mixed and balanced communities. The affordable housing component of schemes should be provided as 70% social rented and 30% intermediate housing.

3.4.6 For many of Lewisham's residents only Social and Living Rent tenures are affordable as they cost less than 35% of the net household income. Therefore we want to see housing being built that is genuinely affordable and addresses housing need. Housing need does not just apply to those who are in most need but also to those who cannot afford to buy a property in today's market who need housing products which are appropriate to them.

3.4.7 The SPG seeks reviews are carried out at the beginning and end of the process which is an approach which Lewisham has had in place for some time and fully supports the Mayor's approach .

3.4.8 We want to see housing being built that is genuinely affordable and addresses housing need. Housing need does not just apply to those who are in most need but also to those who cannot afford to buy a property in today's market who need housing products which are appropriate to them.

Land value

3.4.9 Establishing the correct land value of the site will avoid land values becoming inflated and enable schemes to deliver acceptable levels of affordable housing and s106 contributions. Overpaying for land must be avoided even when sites are close proximity to a new BLE station.

3.4.10 Lewisham's Planning Obligations SPD requires that Existing Use Value Plus Premium (EUV+) is used as the approach to determining the land value benchmark. We have long supported the use of EUV+ as it is based on the current use value of a site. The premium above Existing Use Value will be based on a site specific justification which reflect the circumstances that apply and this should be fully explained.

3.4.11 We encourage consideration of this when land is being purchased as we will be unable to support schemes which cannot afford to mitigate their impacts through s106 and provide insufficient affordable housing where too much has been paid for the land. The Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (SPG) August 2017 also supports this approach, it also gives detailed advice on viability assessments, aiming to establish a standardised approach which should be followed.

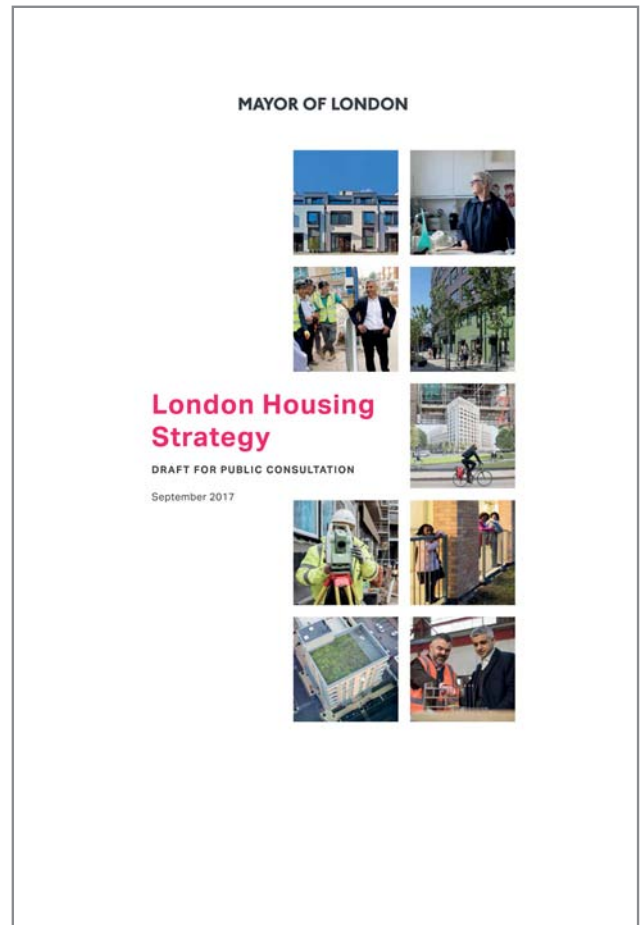
3.5 The Mayor's draft Housing Strategy

3.5.1 The Mayor's Draft Housing Strategy 2017 sets out a range of measures to increase the supply of new homes including: diversifying the housing sector by increasing funding for certain types of housing; setting clear housing targets for councils - including on small sites and; making it quicker and easier to bring small sites to the market and changing the way that MCIL is levied so that small and medium-sized builders pay less up front; ensuring homes are affordable to Londoners on average wages; looking at London Living Rent levels and Shared Ownership; identifying and bringing forward more land for housing; prioritising protection of the Green Belt by supporting high quality high density developments on brownfield land and; improving the skills, capacity and building methods of the construction industry.

3.5.2 We welcome the Mayor's Strategy, which in parts builds on our current approach and in others sets out how we will approach growth in areas around the BLE.

Design led density

3.5.3 The Mayor's Housing Strategy seeks to accommodate growth responsibly by co-locating uses and developing well-designed, high density schemes which are environmentally sustainable which in turn will protect London's Green Belt. In order to make the optimum use of land it needs to be used more efficiently, although developments will still need to be appropriate to their context. To ensure this, the Mayor will set out a new approach to design-led density in his draft London Plan.



3.5.4 Lewisham already has an approach to density which aligns with the Mayor's position. We support well designed, high density schemes in accessible locations. We insist all proposals demonstrate a clear rationale and be based on a detailed analysis of the context. In preparing proposals, both the existing and future context must be considered so as to make the most of the opportunities available.

3.5.5 To successfully apply our design-led approach we accept that this does not come from applying standards rigidly, but involves a stronger appreciation of the surrounding context, and a good understanding of the urban design and architectural principles which underpin successful development.

3.5.6 Where sites are in highly accessible locations it can sometimes be assumed that they are suitable for a tall building. To assess a site's suitability for a tall building each individual site must be master planned and also form part of a wider masterplan study involving neighbouring sites (the scope of this should be discussed through pre application discussions).

3.5.7 We also consider that high density does not necessarily mean development that is tall, there are many excellent examples of high density, mid-rise schemes which have created very successful places.

Tall Buildings

3.5.8 The Mayor accepts that tall buildings have a role to play in delivering London's growth in appropriate locations and that those tall buildings must be built to the highest design and safety standards.

3.5.9 We are supportive of buildings of height in appropriate locations so long as they are of the highest quality design and they have been properly master planned. When considering a tall building, a study of the context around the site which will inform the scheme is very important as each of the areas where growth will be focussed have distinctly different contexts. For example New Cross Gate has a historic character and a prevailing height of mainly 4 storeys whereas Lewisham Town Centre (which we hope will become a Metropolitan Centre) has a cluster of high rise buildings around the station. Consequently what is considered to be tall in Lewisham does not mean the same in New Cross and each proposal must fully consider the existing and future context and present a clear rationale for the scheme.

Small sites

3.5.10 The Mayor's Housing Strategy is looking to small sites to help provide a range of housing and reverse the decline in the number of small sites coming forward. The Mayor wants to make additional smaller sites available with this presumption in favour of appropriate residential policy and to minimise the risks and costs for small and medium-sized builders. The detail on how this will work will be set out in the new London Plan.

3.5.11 We have small and brownfield sites registers and during the recent SHLAA process a large number of sites were assessed throughout the Borough and a number have been consequently added to the lists.

3.5.12 There are many small sites within the vicinity of the BLE and within the RGAs and we will be happy to discuss proposals on those sites through our pre application service.

4 Conclusion

4.1 Conclusion

- 4.1.1 **Whilst the challenge facing London is considerable, Lewisham is well equipped to deal with it.**
- 4.1.2 **Our existing growth strategy and associated policies are robust, tried and tested and continue to deliver high quality new places that complement and strengthen our existing communities. Our Local Development Framework is aligned with the Mayor's strategies and visions set out in the four aforementioned documents associated with his principles of 'good growth'.**
- 4.1.3 The commitment by the Mayor to deliver phase 1 of the BLE represents a considerable opportunity for the Borough of Lewisham by increasing capacity on the Borough's public transport network, metro-isation of the Borough and vastly improving the connectivity. The policies in the London Plan and our own Local Development Framework support the arrival of the BLE and the accelerated growth it will bring. An opportunity that we are working collaboratively with GLA, TFL and neighbouring boroughs to deliver.
- 4.1.4 Lewisham's Regeneration and Growth areas are easily accessible now and will be even better connected with BLE. As such we will have the necessary transport infrastructure in place to make a significant contribution to expanding and growing Lewisham and London. Some parts of the Borough will inevitably experience change but this will be driven on the principles of good design, place making and designing places where people feel safe, with easy access to services, jobs and transport.
- 4.1.5 Lewisham as a Borough and as a Planning Service is 'open for business'. We want to work with landowners, developers and others to bring forward 'good growth' associated with the BLE and beyond. The Planning Service has developed a successful pre application service which we encourage those wishing to talk through schemes to use.
- 4.1.6 We have a positive attitude to growth and we have seen many high density developments completed which have created great places such as Deptford Market Yard, Greenland Place, and Marine Wharf.
- 4.1.7 We also have a pre application service where developments can be discussed prior to submission.