

Sustainable Development Select Committee		
Title	Local Plan Update	
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Class	Part 1 (open)	30 April 2019

1. Purpose

- 1.1. This report is intended to update Members on the progress of the new Local Plan for Lewisham.

2. Recommendation

- 2.1. The Select Committee is asked to note the content of this report.

3. Background

- 3.1. On 12th September 2018 a report was presented to Sustainable Development Select Committee (SDSC) on Lewisham's Local Plan. This provided an overview of the reasons why the council is preparing a new plan, the timetable for its production and the scope of the new plan (i.e. which adopted planning policy documents the new plan will replace). The SDSC report also highlighted some of the key opportunities and challenges that will need to be addressed by the new Local Plan in helping to deliver a "Lewisham for the many". Finally, the report signposted key progress in the different areas of plan production, including early-stage engagement with Members and preparation of the evidence base studies which are needed to inform policy options.
- 3.2. Subsequent updates on the Local plan have been presented to SDSC on the 29th October, 12th December and most recently on the 29th January 2019.
- 3.3. This paper provides a further update on the production of Lewisham's new Local Plan and follows on from previous briefing reports. To avoid duplication of information, this report focusses on key progress made in the period since the last SDSC update in January 2019.

4. Overview of evidence base

- 4.1. In order to pass independent examination local plans are required to meet prescribed 'tests of soundness' as set out in the NPPF. This includes that they must be 'justified' by evidence. The process of plan making therefore involves a significant amount of information gathering at the front end of the process. This information is then used to set policy options and preferred approaches for the plan going forward.

- 4.2. Accordingly, much of the work on the Local Plan to-date has focussed on the preparation of the council's technical evidence base. This includes in-house research along with the commissioning of specialist studies, most of which have now been published online, completed in draft format or are in preparation.
- **Strategic Housing Land Availability Assessment (SHLAA)** – led by the Greater London Authority in partner with the London boroughs, this study investigates the indicative capacity of potential development sites for housing in Lewisham and elsewhere, and has informed the draft London Plan housing targets. **Status: Complete.**
 - **Lewisham Strategic Housing Market Assessment (SHMA)** – an update to the council's previous SHMA carried out jointly with the south-east London boroughs, and to supplement the latest pan-London SHMA, this study provides a local analysis of housing need in terms of type, tenure and size of housing, as well as the need for affordable housing and needs of specialist groups. **Status: final draft anticipated in May 2019.**
 - **Lewisham Character Study** – An urban characterisation study which analyses the form, character and special attributes of the borough, and will be central to underpinning the place-shaping direction and policies of the new Local Plan. The document has been published for consultation in March/April. **Status: Currently undergoing consultation until 25th April.**
 - **Area Frameworks** – the council has commissioned work on the Catford Town Centre Master Plan and New Cross Area Framework, both of which will help to identify opportunities for area regeneration and improvements, and be given effect through the new Local Plan. **Status: Catford – Ongoing, New Cross Gate Framework – Complete.**
 - **Retail Capacity Study** – assesses performance of the borough's town centres and provides an indication of future need for retail floorspace over the plan period, which the Local Plan must address. **Status: Original commission complete. Update to study underway.**
 - **Employment Land Study** – assesses future requirements for employment land and floorspace over the plan period and provides an audit of all designated employment sites in the borough, to help inform policy options for managing the borough's industrial land stock. **Status: 2015 complete, 2019 update complete. See Section 5 for further details and appendix 1 for full document.**
 - **Open Space Study** – provides an audit of the quantity and quality of open space in the borough and will be particularly useful to inform land use designations and interventions in areas of identified deficiency. **Status: Complete. See Section 6 for further details and appendix 2 for full document.**

- **Metropolitan Open Land (MOL) Review** – a review of the boundaries and physical extent of the designated Metropolitan Open Land within the Borough. The study will assess whether the MOL land is serving its principal functions, in line with national planning policy and guidance. Findings will inform considerations for any future amendments to the boundaries, which must be made through the plan process. **Status: Procurement process underway.**
- **Biodiversity Study** – assesses Sites of Importance for Nature Conservation (SINC) within the borough and will help to inform future land use designations to support nature conservation. The study was recently reviewed by the London Wildlife Sites Board at the Greater London Authority, who have validated the methodology used for the assessment and are content for the study to support local plan preparation. **Status: Validated by London Wildlife Sites Board in April 2019. Complete.**
- **Strategic Flood Risk Assessment (SFRA)** – an update to the existing SFRA which will ensure that the latest available baseline information on flood risk is used to inform plan making and decision taking. **Status: Stage 1 Complete. See Section 7 for further details and appendix 3 for full document. – Stage 2 will commence when site portfolio agreed.**
- **Infrastructure Delivery Plan** – developed in liaison with key infrastructure providers (both internal and external) this document sets out the infrastructure that is required to support the levels of planned growth in the borough, along with information on funding and delivery, and is regularly reviewed and updated. **Status: Ongoing**
- **Sustainability Appraisal / Strategic Environmental Assessment** – these social, economic and environmental assessments are a statutory requirement which are carried out iteratively throughout the plan process. **Status: Ongoing**
- **Local Plan Viability Study** – a detailed assessment of the viability of the Local Plan. The study will test bespoke policy approaches, including on affordable housing, to ensure these are viable and deliverable. This is a key evidence base document which is needed to support the Local Plan examination. **Status: Procurement process underway.**

- 4.3. All evidence base documents will be made publicly available as appropriate (accessible on the council's planning webpages) as they are finalised. The evidence base will be published alongside the submission Local Plan and be subject to scrutiny through the independent examination process.

5. Employment Land Study

- 5.1. The Employment Land Study (ELS) is an evidence base document that will inform preparation of the new Local Plan. It builds on previous studies

(published in 2008 and 2015 respectively) and will underpin the council's strategic approaches on employment land management. The ELS is principally concerned with commercial and industrial uses. These are distinguished from retail and related town centre uses that also generate employment but are dealt with separately in other studies.

- 5.2. The main purpose of the ELS is to provide an up-to-date assessment of employment land supply and demand in the borough, in order to identify projected future needs that must be planned for.
- 5.3. The headline finding of the ELS is that the council must adopt a more rigorous approach to protecting its stock of employment land in order to meet future needs. This includes both designated and 'non-designated' employment sites. Lewisham, like most other London boroughs, has lost a significant amount of its historic industrial capacity over recent years. Some losses have been facilitated through the plan process to support regeneration objectives, e.g. Plough Way, Convoys Wharf. However this has coincided with a sustained period of incremental losses owing to change of use to higher value land uses (mainly housing) which has, in part, been aided by new Permitted Development rights (e.g. allowing conversion of office to residential use). Indeed, the study notes that the borough's indicative 'industrial land release' benchmark set by the London Plan has now been met.
- 5.4. Another key finding of the ELS is that future need for employment floorspace over the twenty-year plan period is circa 21,800 square metres of office / flexible light industrial floorspace. This type of floorspace is needed in particular to accommodate Lewisham's growing strength in cultural, creative and digital industry sectors.
- 5.5. To meet the borough's future requirements the ELS suggests that the council should seek to intensify development on all employment sites and seek qualitative improvements in business premises. It also suggests a targeted approach to enable mixed-use, employment led development on selected sites, particularly where viability issues may prohibit fully commercial schemes coming forward. The study concludes with site-specific recommendations where this approach might be appropriate.
- 5.6. Officers will consider the study findings in setting new Local Plan policies. This includes a review of the existing employment land-use designations and detailed 'development management' style policies. The ELS implies that our direction of travel will be to strengthen protection of all employment sites along with bespoke policies to facilitate net gains in employment floorspace over the long term.

6. Open Space Study

- 6.1. A new Open Space Assessment has been commissioned as part of the evidence base for the new Local Plan. The commission provides the council with an up-to-date audit of green and open space provisions in the borough,

provides an assessment of their quality and existing uses, as well as identifying any areas of deficiency across the borough.

- 6.2. The evidence will support plan policies relating to the protection and enhancement of green and open spaces in the borough, and allow the council to devise strategies to ensure future needs and opportunities are considered in a coordinated way.
- 6.3. Overall, the work recognises that open space makes a significant contribution to the character and quality of places in the borough, and has an important influence on public health, well-being of local residents, as well as improving the borough's resilience to climate change and supporting wildlife and biodiversity.

Open space Accessibility

- 6.4. Findings from the report suggest that whilst the borough is generally well-served by parks and open spaces, access and provision to differing open space typologies and play space across the borough can be fragmented, with some under-provision identified in particular areas.
- 6.5. Metropolitan Parks - Lewisham is well-served with open spaces of 'Metropolitan' scale however there are small areas of deficiency to the west of Forest Hill and to the south-east of Grove Park.
- 6.6. District Parks - Lewisham has a significant deficit in 'District' parks. Only Beckenham Place Park and Summerhouse Fields in the extreme south of the borough lies within this definition. 'District' parks in neighbouring boroughs create some provision on the western fringes of the borough.
- 6.7. Local Parks - The borough has a good level of provision but there are corridors of under-provision between New Cross and Forest Hill and between Lewisham, Grove Park and Bellingham.
- 6.8. The report also recognises that railway lines and road corridors can act as barriers restricting public access to open spaces in some parts of the borough.
- 6.9. The report recommends that the council maintain policies to ensure there should be "no net loss" of open spaces within the borough.

Play

- 6.10. Lewisham has good levels of provision of Neighbourhood Equipped Areas for Play (NEAP) but there is a swathe of under-provision along the eastern edge of the borough. The potential influence of NEAPs outside the borough on provision in this area has not been assessed.

6.11. Local Equipped Areas for Play (LEAP) are evenly distributed across the borough but there are areas of relative under-provision in a corridor between New Cross and Forest Hill and between Catford and Grove Park.

6.12. Local Areas for Play are also broadly distributed but there are similar geographical gaps in provision to those affecting access to LEAP sites.

Population growth and provision

6.13. The study recognises that the growth in population will increase the demand on the borough's existing green infrastructure and outlines that in order to maintain the current level of greenspace provision, the growth in the borough's population over the next twenty years implies the need for the provision of approximately 50 hectares of new public open space by 2030.

6.14. The report recommends, where appropriate new open space provision should be planned as part of the development of strategic sites. It is recognised, however that in this urban context and in the context of Lewisham facing significant development pressure, there is limited scope to provide major additional open space to accommodate the needs of the growing population. It is therefore essential that the quality of existing green infrastructure and access to this green infrastructure be improved to address this.

Quality assessment

6.15. An audit of current open space provision and the quality of this provision was carried out in the summer of 2018. A total of 349 sites were surveyed, categorised in accordance with London open space typologies.

6.16. The quality assessment criteria for the survey were based on 'Green Flag' as the excellence standard for parks and open spaces across the UK. Quality scores were also weighted to address issues of incompatibility between different typologies. For example, a lack of a wide range of facilities in natural and semi-natural sites could have resulted in their achieving 'low quality' scores in comparison with large parks with multiple offers. The weighting process compensated for these incompatibilities.

6.17. The assessment identified that the majority of open spaces across the borough are fair to good.

6.18. In the context of the London Plan typologies, 'good' quality sites are evenly distributed between 'small' open spaces and 'local' parks. 'Fair' quality parks are evenly distributed between 'pocket' parks, 'small' open spaces and 'local' parks.

6.19. It is important to note that most of the 'poor' quality sites identified within this assessment are railway corridor land with no public access. There is a limited case for investment to deliver uplift in these spaces as a consequence of this lack of accessibility.

- 6.20. Officers will consider the study findings in setting new Local Plan policies. This includes a review of the existing open space designations; reviewing detailed 'development management' style policies and informing site allocations to ensure new open space is created where practically possible particularly in areas identified as having deficiencies.
- 6.21. The report will also support the use of planning powers to secure planning contributions for improvements to existing open spaces as well as the long-term management and maintenance of green and open spaces from new developments.
- 6.22. Further to the Local Plan, the report could also be used to update the borough's Open Space Strategy 2012-2017. The quality assessment of Lewisham's green spaces could allow for the assessment of where investment might best be targeted to deliver an 'outcome uplift', especially in areas where the population is predicted to rise most significantly.

7. Strategic Flood Risk Assessment - Level 1 Report

- 7.1. A Strategic Flood Risk Assessment (SFRA) has been commissioned to support preparation of the Lewisham's new local plan. The SFRA is a technical document that is needed to ensure that flood risk management is appropriately considered through all stages of the planning process. It is a 'living document' and intended to be periodically reviewed to take account of the latest information. The current commission will update the council's 2008 and 2015 studies. The SFRA comprises of two component parts: a Level 1 report which provides an up-to-date overview of risk from all sources of flooding (i.e. a baseline assessment) and a Level 2 report which provides detailed assessments of specific development sites which are proposed to be included in the new Local Plan.
- 7.2. The SFRA Level 1 report has been prepared in consultation with the statutory consultees Environment Agency and Thames Water Utilities. It includes a summary of the planning policy context and historical incidences of flooding in Lewisham. It then moves on to consider the overall risk of flooding from all sources across the borough, taking into account the latest modelling on the impacts of climate change. This research is translated into a series of flood risk maps and policy recommendations which will help to inform preparation of the local plan. From now on, this Level 1 report will need to be referred by those submitting planning applications, and it helpfully concludes with design guidance for developers. Finally, work will soon commence on the Level 2 report and will consider the emerging site portfolio for the Local Plan.

8. Site portfolio work

- 8.1. Building on the SHLAA work above, in-house research is being undertaken to finalise a portfolio of potential development sites to be considered for inclusion in the Local Plan; this includes sites identified through a 'call for sites' consultation which was held 19th September to the 1st November 2018.

- 8.2. We are currently organising an all members briefing to discuss the emerging spatial strategy and identified site allocations. This will be scheduled May/June 2019.

9. Homebuilding Capacity Fund

- 9.1. Lewisham Council have been awarded £525,000 by the GLA from the Homebuilding Capacity Fund to ensure future growth and investment within the borough is properly planned with a particular focus on delivering a new generation of genuinely affordable homes.
- 9.2. The programme is focussed on four priorities:
- Delivering a new generation of council homes;
 - Increasing housing supply by supporting the development of small sites
 - Proactively planning in areas with significant growth potential; and
 - Ensuring optimal density of new residential developments.
- 9.3. Councils were invited to bid for revenue funding for 2019/20 and 2020/2021, to be split between up to five proposals. The council was successful in the following bids:
1. **Housing Growth Team** – funding to create a dedicated, multi-disciplinary team within the council to speed up and expand on our ambitious programme of delivering new council housing for the borough.
 2. **A21 Corridor Strategy** – funding to produce a placemaking strategy for the central spine of the borough from Lewisham Town Centre to Bellingham and Downham. The study will look at options to improve public transport accessibility, walking and cycling, improvements to green infrastructure, improvements to local centres and businesses along the route as well as looking at potential development sites.
 3. **Suburban Improvement SPD** – funding to produce a placemaking strategy for the boroughs suburban housing within Downham and Bellingham. The study will explore how design led, suburban intensification could support the improvements to neighbourhood centres, green spaces and other community infrastructure as well as delivery much needed new homes.
- 9.4. The council's strategic housing and strategic planning teams will lead the projects.

10. Financial implications

- 10.1. At this stage there are no direct financial implications arising from this report.

11. Legal implications

- 11.1. At this is an information item there are no direct legal implications arising from this report.

12. Crime and disorder implications

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

13. Equalities implications

13.1. Our vision and ambition for our borough is that: “Together we will make Lewisham the best place in London to live work and learn.”

13.2. This is underpinned by hard-edged principles for:

- **reducing inequality** – narrowing the gap in outcomes for citizens
- **delivering together efficiently, effectively and equitably** - ensuring that all citizens have appropriate access to and choice of high quality local services

13.3. The Council's Comprehensive Equality Scheme (CES) 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.

13.4. The Council equality objectives through the CES include:

- tackle victimisation, discrimination and harassment
- improve access to services
- close the gap in outcomes for all residents
- increase mutual understanding and respect within and between communities
- increase citizen participation and engagement

13.5. There are no direct equalities implications arising from this report

14. Conclusion

14.1. The Committee is asked to note the content of this report setting out an update on work being undertaken by officers. If you have any questions about this report please contact David Syme, Strategic Planning Manager david.syme@lewisham.gov.uk