

Lewisham Housing Delivery Test: Action Plan 2024

May 2024



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1. Background

- 1.1 Local authorities are required to prepare a Housing Delivery Test (HDT) Action Plan where they have delivered below 95% of their housing requirement in the preceding three years. This Action Plan has been prepared in response to Lewisham scoring 51% in the latest HDT.
- 1.2 This Action Plan has been prepared in line with national guidance. *Planning Practice Guidance: Housing Supply and Delivery* (July 2019) suggests that action plans should include an analysis of under-delivery and a range of actions that can help to boost delivery in the future. *PAS Guidance: HDT Preparing Effective Action Plans* (June 2020) states that action plans should be concise, easy to read, be maintained as a live document and identify tangible, implementable key actions to boost housing delivery and establish how they will be implemented and monitored over time.

This Action Plan:

- Provides an overview of what the HDT is and explains Lewisham’s latest HDT result – see section 2.
- Identifies the consequences of failing the HDT - see section 3.
- Provides an understanding of local housing delivery in Lewisham – see section 4.
- Considers reasons for under-delivery – see section 5.
- Explores how the Council is seeking to minimise the risk of under-delivery and identifies key actions to boost housing delivery – see section 6 and Appendix 1.
- Sets out project management arrangements – see section 7.

2. Lewisham’s 2022 Housing Delivery Test Measurement

- 2.1 In 2018 the NPPF introduced the HDT as a new way to measure housing delivery. It measures the amount of housing completed against the number of homes that are required for an area, over the preceding three years. The Government publishes the results, usually on an annual basis. Where it indicates that housing delivery in an area is below a specified level, local authorities must face consequences and take action, as listed in Table 1.

Table 1: HDT Consequences

Under performance	Action required
Below 95%	Local authorities should prepare an action plan.
Below 85%	Local authorities should prepare an action plan and plan for a 20% buffer in the five year housing land supply (5YHLS).
Below 75%	Local authorities should prepare an action plan, plan for a 20% buffer in the 5YHLS and the presumption in favour of sustainable development applies.

- 2.2 Table 2 shows Lewisham’s latest result from the 2022 HDT measurement, published by Government on 19 December 2023 for the reporting period over the previous 3 financial years - 2019/20, 2020/21 and 2021/22. Whilst completions have been assessed against the London Plan target of 1,667 per annum, 2019-20 and 2020-21 have been assessed against a lower requirement to take account of Covid-19 and the disruption caused by the national lockdowns during 2020 and 2021. The 2022 Housing Delivery Test measurement demonstrates that the development industry is performing poorly across Lewisham as it delivered only 51% of the requirement over the reporting period.

Table 2: Lewisham's 2022 HDT result

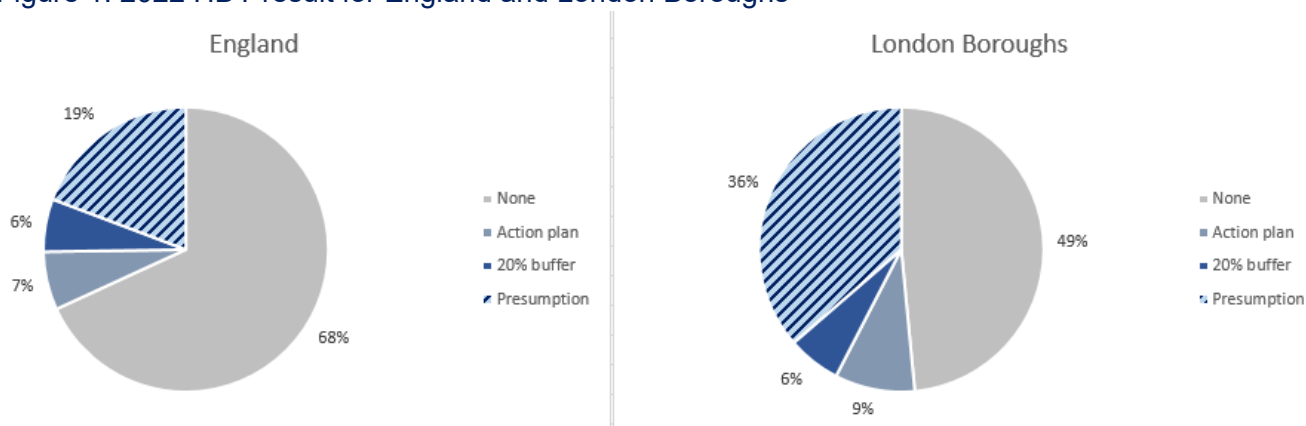
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	HDT 2022 measurement
19-20	20-21	21-22		19-20	20-21	21-22		
1,526	1,110	1,667	4,303	1,283	523	386	2,192	51%

2.3 Lewisham is not alone. The first chart in Figure 1 shows that 32% of local authorities in England now face HDT consequences and 19% are now in the presumption in favour of sustainable development. The second chart in Figure 1 shows that housing delivery is worse across London than it is nationally, as 51% of London Boroughs now face HDT consequences:

- 9% are now required to prepare Action Plans including Bexley, Ealing and Richmond upon Thames.
- 6% are now required to prepare Action Plans and apply the 20% buffer including Hackney and Newham.
- 36% are now required to prepare Action Plans, apply the 20% buffer and are in the presumption in favour of sustainable development, including Lewisham, Barking and Dagenham, Bromley, Camden, Enfield, Greenwich, Havering, Kensington and Chelsea, Merton, Old Oak and Park Royal Development Corporation, Redbridge and Southwark.

2.4 The South East saw the greatest proportion (48%) of local authorities fail the HDT to some degree, with 32% facing presumption in favour of sustainable development.

Figure 1: 2022 HDT result for England and London Boroughs



2.5 It is likely that Lewisham will remain subject to all three penalties until at least the publication of the 2026 HDT measurement. Following that delivery could recover to a performance of approximately 89%, which would still impose the penalty of preparing an Action Plan.

2.6 It is worthwhile taking into consideration that Lewisham has previously scored well, with scores of 101% in the 2019 HDT measurement and 95% in the 2018 HDT measurement. Looking back further based on a three year rolling average, Lewisham's delivery has been above the 95% threshold since before the Core Strategy was adopted in 2011. Lewisham did not face any consequences until 2020 when a score of 88% introduced the need to prepare an Action Plan.

3. Tackling the Consequences

3.1 Given the score of 51%, the Council now needs to address how it will act upon all three penalties:

Action Plan

- 3.2 This paper forms the action plan. It articulates the true cause of under-delivery and sets out how it will respond to development industry under-performance through its plan-making, decision-taking, corporate, operational, and procedural activities. This could encompass a wide range of actions – all of which seek to provide greater certainty of actual on-the-ground delivery of new homes.

20% Buffer

- 3.3 The poor performance in housing delivery has triggered the need for the Council to demonstrate an additional 20% buffer on top of the Borough's housing requirement. The Council has now prepared an Additional Housing Supply Background Paper May 2024 to respond to this dynamically changed position. This follows on from a situation where, as at submission in November 2023, the Borough's housing requirement was met in full, based on the housing requirement as set out in paragraph 4.5 – i.e., 2,358 net new homes per annum during Years 1 – 5, and 1,667 thereafter and an identified **5.03** years' worth of housing supply. This meets the national planning policy objective of significantly boosting the supply of homes. It is an ambitious housing requirement that is significantly higher than previous housing targets and 171% more than in 2011, when Lewisham's Core Strategy was adopted.
- 3.4 The Additional Housing Supply Background Paper May 2024 seeks to demonstrate the comprehensive and exhaustive process that the Council has gone through in an attempt to meet the requirement of a 20% buffer at this late stage of the plan-making process.

Presumption in Favour of Sustainable Development

- 3.5 The presumption in favour of sustainable development means that the Council will be presented with some challenging decisions, as generally, applications should now be granted planning consent unless their adverse impacts 'significant and demonstrably' outweigh their benefits. It effectively means that it will be more difficult for the Council to defend applications at appeal stage and the weight applied to delivering housing to meet the national shortage may over-ride local policies.

4. Local Housing Delivery

- 4.1 This section seeks to understand housing delivery at the local level, by looking at Lewisham's past performance as well as the anticipated future housing supply.

Past performance

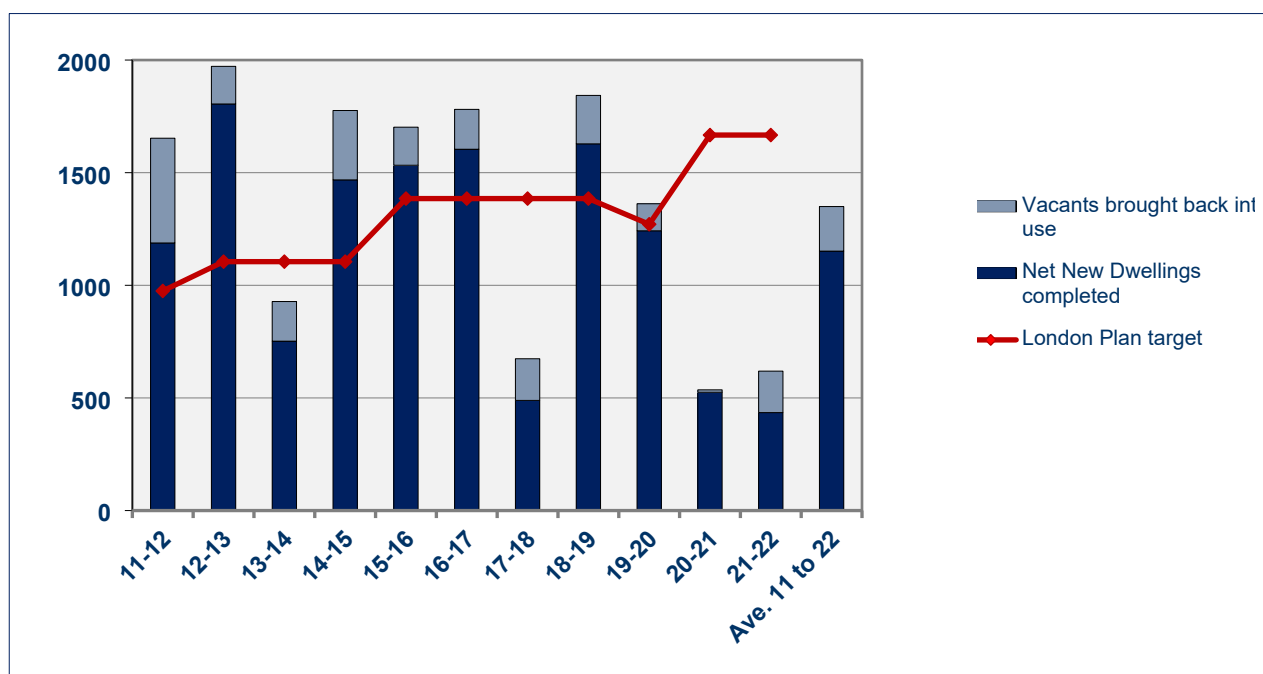
- 4.2 Despite only reaching 51% in the 2022 HDT measurement, Table 3 shows that 19 large sites (above 10 net units) experienced completions during the preceding three years. This demonstrates that past delivery has been reliant on more than just a few sites and that a variety of sites have been delivered.

Table 3: Net completions on large sites in last three years

2019-20	2020-21	2021-22
Anthology, Deptford Foundry (316)	Lewisham Exchange (former Carpetright) (370) – 67 units and 758 student units at a ratio of 2.5:1)	Amersham Vale (former Deptford Green School) (120)
Timberyard, Oxestalls Road (203)	Astra House, 23-25 Arklow Road (33)	179 Dartmouth Road (former Sydenham Police Station) (33)
Bond House, Goodwood Road (89)		1 Melfield Gardens (32)
19 Yeoman Street (72)		Kenton Court, 132 Adamsrill Road (25)
Rear of 15 Tyson Road (68)		
43-49 Pomeroy Street (65)		
Rear of Chiddingstone House (53)		
BMW, Lee Terrace (30)		
St Mungos, Arlington Close (28)		
Fairway House, 53 Dartmouth Road (27)		
Longfield Crescent Estate (27)		
Former Pheobes Garden Centre (27)		
16-22 Brownhill Road (19)		

4.3 To understand housing delivery further, and to ensure short-term downturns in delivery experienced in the HDT are viewed within a wider context, it is useful to consider longer-term delivery. Figure 2 shows Lewisham’s delivery performance over the last 11 years since the Core Strategy was adopted in 2011.

Figure 2: Completions 2011-12 to 2021-22



4.4 It demonstrates a few trends over time:

- The housing target (red line) has increased through different versions of the London Plan from 975 units per year in 2011-12, to 1,105 in 2012-13, to 1,385 in 2015-16, to 1,667 in 2019-20. This increase makes achieving delivery each year more challenging.

- The net housing completions (blue bars) have fluctuated since 2011, with completions being below target in four of the 11 years. On average 1,152 net new dwellings have been completed annually and 12,669 net new dwellings have been completed cumulatively since 2011.
- The average number of net new dwellings completed per year between 2011/12 and 2019/20 exceeded Lewisham's annual target. Since 2020/21 however we have seen a significant drop in the number of net new homes completed each year.
- This shows that the 2020 HDT score of 51% does not reflect the usual good performance that Lewisham normally experiences.

Future supply

- 4.5 A good supply of housing sites coming forward in the future can help to reduce the risk of under-delivery. The updated housing trajectory (submitted version from November 2022) demonstrates:
- A supply of 11,863 new homes during Years 1 – 5 of the new Local Plan. This exceeds the housing requirement of 11,790 (based on 2,358 per annum, consisting of 1,667 per annum London Plan target plus 579 per annum to cater for backlog arising from under-delivery plus 112 per annum for a 5% buffer, then multiplied by 5 years).
 - A supply of 29,816 new homes during Years 1 – 15. This exceeds the housing requirement of 28,460 (based on 2,358 per annum for Years 1 – 5, then the 1,667 per annum target has been rolled forward during Years 6 – 15).
 - A supply of 32,806 new homes for the remainder of the Plan period (2022/23 – 2039/40).
- 4.6 This future supply consists of:
- Site allocations that have planning consent - with either full, outline, prior approval, or resolution to approve subject to a section 106 agreement, of which some have started construction.
 - Site allocations that have started to progress through the planning system - sites with submitted applications, advanced pre-applications and sites at design stage.
 - Site allocations – either carried forward from adopted local plans or new draft site allocations.
 - Small site windfalls, not previously anticipated.
 - Sites have only been included in the 5YHLS where they comply with the NPPF Annex 2 definition of deliverable (i.e., available, in a suitable location and achievable, with a realistic prospect that they will be delivered within five years).
- 4.7 As of November 2022, Table 4 shows a strong housing supply for the remainder of the Plan period (up to 2039/40), with a total of 32,806 new homes to be delivered. 44% already have planning consent or have started construction and a further 22% have already started to progress through the planning system.
- 4.8 Table 4 also shows a strong housing supply up until the end of the 5YHLS (2028/29), with a total of 13,604 to be delivered, of which 55% already have planning consent or have started construction and a further 28% have already started to progress through the planning system.

Table 4: Deliverable sites for the remainder of the Plan period (2022/23 to 2039/40)

Type of site	Up to end of 5YHLS			2022/23 – 2039/40		
	Number of sites	Number of homes	% of homes	Number of sites	Number of homes	% of homes
Site allocations consented and under construction	13	3,903	29%	13	4,615	14%
Site allocations consented but not yet started construction	7	2,472	18%	7	8,581	26%
Site allocations with submitted applications or at pre-application stage	17	3,618	27%	19	6,847	21%
Site allocations with masterplans or design studies	0	0	-	7	1,966	6%
Site allocations carried forward from adopted local plans and yet to progress	0	0	-	7	1,143	4%
Site allocations newly identified and yet to progress	0	0	-	18	1,656	5%
Other large, consented sites under construction	21	708	5%	21	708	2%
Other large, consented sites not yet started construction	9	256	2%	10	474	1%
Other large sites with submitted applications or at pre-application stage	2	112	1%	2	112	1%
Small windfall sites consented sites under construction	1	261	1%	1	261	1%
Small windfall sites 379 units per annum, in line with the small sites housing target in the 2021 London Plan	-	2,274	17%	-	6443	19%
Total for all sites	70	13,604	100%	105	32,806	100%

4.9 This demonstrates that a lack of housing supply is not a problem for Lewisham.

5. Reasons for Under-Delivery

5.1 This section considers if there are potential trends and factors impacting on local housing delivery. The number of new homes being completed in any one year fluctuates and it is evident that housing delivery is yet to return to normal.

5.2 From the outset, when considering the reasons for under-supply, it is imperative to stress that Lewisham has performed well in the past and has a healthy future supply of development sites. **It is not the lack of development sites that is holding back housing delivery.** This is demonstrated further below.

Lapsed Sites

5.3 Some consented sites have not been implemented. Whilst the majority are small private sites, there have been some large development sites too, e.g., Lewisham Retail Park. When considering lapsed sites, they include varying types in terms of the mix of development types – residential only developments do not fare better than mixed use developments, and vice versa. Lapsed sites are difficult to control as the Council has minimal powers to intervene in the development of private sites.

Build Out on Consented Sites

- 5.4 Housing delivery is reliant upon the private sector to implement planning consents, and bring forward phased schemes in a timely manner. Some sites have stalled in Lewisham and there is a recognition that some sites, especially large, complex and phased schemes, can take a considerable time to be built out. Lewisham has tended to be reliant on large, complex multi-phased sites to deliver the bulk of its new housing. Strategic sites such as Cannon Warf, Marine Warf, Lewisham Renaissance and others have been key to Lewisham meeting its housing targets in the past. The borough is still reliant on strategic sites of this nature for much of its supply. Sites such as Deptford Landings, Deptford Foundry, Lewisham Gateway and others are delivering many new homes in the borough and sites such as Surrey Canal Triangle, Convoys Wharf, Lee Gate Shopping Centre, Lewisham Shopping Centre etc are key strategic sites capable of delivering substantial number of new homes.
- 5.5 Table 5 lists the Strategic Site Allocations identified in the 2011 Core Strategy. Although they were granted outline planning consent as far back as 2012, it was always anticipated that these strategic scale developments would be delivered in the longer term (up to 2026 and beyond). The Council has been working closely and proactively with landowners, developers, and key stakeholders since 2011, to bring these Strategic Site Allocations forward for development in a timely manner. Table 7 details the progress made so far.

Table 5: Longer Term Delivery for Strategic Site Allocations

Site name	Progress so far
Convoys Wharf	This is a phased site that was granted consent by the Mayor of London in 2014. Across the whole Convoys Wharf site there will be 3,500 new homes. Reserved matters for Phase 1 (plots 8, and 15) were granted consent in 2020 and a series of reserved matters applications are anticipated. Construction actually commenced in Q1 of 2022, with works to the listed river wall as well as construction of a three-storey non-residential building on Plot 22, the jetty. Development of the site stalled towards the end of 2023. One of the reasons for this is the need to amend consents to align with the new Fire Regulations. The developers are now also considering the need to intensify the development, on grounds of viability.
Surrey Canal Triangle	This phased site was granted outline permission in 2012, and a S73 was granted in 2015. A Supplementary Planning Document (SPD) has been prepared to guide future development and funding has been secured to deliver a new railway station. A new application includes Renewal's land (but excludes Millwall Football Stadium and its surrounding land). This hybrid application comprising 3,500 homes, of which 35% will be affordable housing, and a range of non-residential floorspace over 5 phases (600 in detail in Phase 1) was granted a resolution to approve in January 2022. It is now subject to negotiations between the Council, the applicant, the GLA and TFL and completion of the section 106 agreement and Stage 2 referral to the Mayor of London.
Timberyard, Oxestalls Road	This is a phased site with outline consent granted in 2016. It has already started construction and completed the first plot of 203 new homes in 2020. Two reserved matters applications were consented in 2018-19 and permission was granted in November 2023 for a minor material amendment for Plots 1 – 3. Construction work remains ongoing for Plot 4. Plot 5 gained planning consent in November 2023. Plot 6 non-material amendment and deed of variation were granted consent in early 2023, with works due to commence.
Lewisham Gateway	This is a phased site, with outline consent granted in 2009. Phase 1 with 362 new homes was completed in 2017-18. Phase 2 was granted consent in 2019 comprising 530 units and 119 co-living units. Construction started on site in 2020. Whilst there have been some delays, construction continues and is well advanced, with completion of the project anticipated in 2024.
Plough Way	This site is made up of different plots: Greenland Place, Marine Wharf West, and Marine Wharf East, 1-17 and 19 Yeoman Street. It is now complete.

- 5.6 Whilst the Council is continuing to grant permissions for both minor and major developments in the borough, it can take considerable time before homes start to be constructed on some site. The reasons for this vary.
- 5.7 The Council is experiencing increasing delays on some major applications due to the time it takes to negotiate complex Section 106 agreements. This can lead to protracted negotiations when funding is not secured, and schemes can have a resolution to approve for a considerable amount of time before a S106 is agreed. Negotiating complex S106 agreements is time consuming, especially when agreeing to lower than target affordable housing on grounds of financial viability or seeking costly improvements to transport infrastructure.
- 5.8 Conversely, the Planning Service has negotiated to bring forward affordable housing early in the delivery of the Convoys Wharf site and for an improved tenure mix that includes social rent. These were not part of the outline planning permission originally approved by the GLA and hence they took time to agree with the developer.
- 5.9 Whilst the delivery of housing is important, it also needs to be the right tenure to meet local housing needs. Negotiating the right S106 agreement for each site can be time consuming but will boost the delivery of a range of housing tenures, including affordable housing.
- 5.10 Pre-commencement conditions to deal with site constraints can front-load site costs and take time to implement and discharge, before new homes can start to be built. For instance, two sites at Anthology, Deptford Foundry and Timberyard, Oxestalls Road both needed to deal with the contamination of land previously used for industrial uses in the initial stages of their development. This requires costly and time-consuming demolition of buildings and warehouses, wholesale site clearance and on-site decontamination.
- 5.11 Providing road and utility infrastructure can also extend the time before new homes are built and requires coordination with other construction and utility companies. For example, the Lewisham Gateway site required the multifaceted reconfiguration of the road network surrounding the site during the initial stages of constructing phase 1.
- 5.12 Sites with tall buildings take longer to construct and are slower to deliver, but once completed, they provide significant numbers of new homes all together, creating a “lumpy” housing supply. For example, Timberyard, Oxestalls Road completed 203 new homes all at one time in 2019/20.
- 5.13 Momentum can be difficult to maintain, especially in large, phased schemes. Some schemes such as Lewisham Gateway and Deptford Landings (Oxestalls Road) have experienced a pause between phases. Some sites are more prone to delays where they have multiple ownerships with numerous applicants, landowners, leaseholders, developers, utilities providers and other key stakeholders.
- 5.14 Nevertheless, there are major sites within the Borough nearing completion which the Council anticipates will result in a significant increase in completions in the next couple of years. This includes schemes such as Conington Road, Lewisham Gateway, Axion House and Silver Road, Church Grove, Heathside and Lethbridge and parts of Deptford Landings (Oxestalls Road).

Amendments to Consented Schemes

- 5.15 Some consented sites have not been implemented because the landowner is now submitting new applications, or a S73 application to vary the original consent, primarily to increase housing capacity on-site. This is in response to a changing policy position. Policy

H1 of the 2021 London Plan encourages boroughs to “*optimise the potential for housing delivery on all suitable and available brownfield sites*”. Policy D3 also advocates that “*All development must make the best use of land by following a design-led approach that optimises the capacity of sites... Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling... In other areas, incremental densification should be actively encouraged by boroughs to achieve a change in densities in the most appropriate way*”.

- 5.16 Lewisham Gateway has already been consented for a higher amount of housing than originally anticipated in the outline permission in 2009. Other consented schemes are currently being reconsidered for significantly uplifted capacities include Timberyard (Oxestalls Road), Leegate Shopping Centre, Surrey Canal Triangle and Excalibur. Together, the increased capacities could generate an additional 1,700 units compared to the original consents, although there will be delays whilst consideration of these applications take place.
- 5.17 In some instances such as Willow Way and Sun Wharf, sites are being granted consent in full knowledge that the consent will not be implemented, and the landowners/developers are already working up new schemes that intensify the site’s use further.
- 5.18 A recent trend seen by the Council is the need for applicants to re-think the design of their schemes. In response to the Grenfell Tower fire in 2017 the Government introduced new fire regulations in July 2023, buildings over 18 metres to have a second stair core and lifts, so that there are two means of escape and access in the event of an emergency. In some instances, the currently proposed designs cannot accommodate an additional stair core, meaning new applications for new buildings will need to be submitted for approval, even on sites with current planning consent, causing further delays.
- 5.19 The introduction of Biodiversity Net Gain may also have a similar impact, with schemes being re-designed and new or revised applications being resubmitted in the future.
- 5.20 Another trend is that some applicants have been, and are continuing to, re-submit applications to convert from one type of residential accommodation to other forms that are currently more viable, such as student accommodation and co-living schemes. This is apparent on sites such as Lewisham Shopping Centre, Lewisham House, Lower Creekside, Trundleys, Apollo and Scott House.

Unimplemented Site Allocations

- 5.21 Some sites have not been implemented despite being an adopted site allocation. Table 6 shows that eight site allocations from the adopted 2013 Site Allocations Local Plan and 2014 Lewisham Town Centre Local Plan have not yet made any progress towards gaining planning consent. One advantage of this delay is that expectations in terms of how much a site can optimally deliver have risen since their original adoption and their combined capacity proposed in the new Local Plan is 1,311 more than originally anticipated in 2013 and 2014.

Table 6: Unimplemented sites

Site name	Development proposed	Site size (hectares)	Number of homes to be delivered on site
Hatcham Works, New Cross Gate Retail Park	Mixed use	3.67	800
Bell Green Retail Park	Mixed use	7.37	748
New Cross Gate station sites, Goodwood Road	Mixed use	0.61	167
113 to 157 Sydenham Road	Mixed use	0.87	157
Dartmouth Road, west of the railway line	Mixed use	0.43	80
Driving Test Centre, off Ennersdale Road	Mixed use	0.41	40
111-115 Endwell Road	Mixed use	0.38	57
Waldram Place & Perry Vale, east of railway line	Mixed use	0.20	41
Total			2,090

Finding New Sites

- 5.22 Some applicants may be waiting for sites to become site allocations within an adopted Local Plan before they submit a planning application to the Planning Service. This can take years to do and can result in sites being left undeveloped. But an adopted Local Plan gives applicants the confidence that applications will be approved without further delay, where they align with the Local Plan. The determination of planning applications for windfall sites can result in time consuming debates about the suitability of the site for housing or lengthy appeals when an application is refused on grounds of non-conformity to the Local Plan.
- 5.23 It also takes time to carry out site analysis and to find new sites suitable for residential development and the Planning Service has had a continuous dialogue with landowners and developers to identify suitable land for housing across the Borough. Starting to consider opportunities now to develop a range of new sites on public land will help to boost housing delivery a few years later. New site allocations have been identified as part of the preparation of the new Local Plan, given that many adopted site allocations have already been developed or now have planning consent.

Dependence on the Housing Market

- 5.24 In general, the amount of housing available in the local housing market can be reliant upon a number of factors beyond the control of the Council, such as high land prices, difficulty in securing finances, profitability of sites, complex multiple land ownerships and homes being purchased as investments rather than places to live in. Whilst there is no firm evidence that these factors are severely affecting current housing delivery in Lewisham, annual monitoring should continue to identify if they become an issue in the future.
- 5.25 The Government has recognised that there are difficulties with the housing market nationally and has over the last few years has been seeking to enhance the capacity of local authorities and industry to build the new homes that the country needs. The Government recognised in its White Paper *Fixing Our Broken Housing Market* (February 2017) that as a country we have not built enough homes. It placed the responsibility for this on not enough local authorities planning for the homes they need; house building being too slow and the construction industry being too reliant on a small number of big players.
- 5.26 The Final Report of the Independent Review of Build Out (October 2018) prepared by Oliver Letwyn MP found that “the homogeneity of the types and tenures of the homes on offer on large sites, and the limits on the rate at which the market will absorb such homogenous

products, are the fundamental drivers of the slow rate of build out". However, it goes on to explain that forcing major house builders to reduce the prices at which they sell their current products would create serious problems not only for the major house builders but for the housing economy as a whole.

- 5.27 The Letwyn Review also assessed the extent to which both start up on site and later build out rates could be affected by *"lack of transport infrastructure, difficulties of land remediation, delayed installations by utility companies, constrained site logistics and limited availability of capital, building materials and skilled labour"*. It found that more effective coordination between government departments, agencies and private sector operators is urgently required to improve and speed up the delivery of transport and utility infrastructure before the build out could start (and sometimes during the construction period) on large brownfield sites.
- 5.28 Housing Partnerships: Delivering the homes that London needs (June 2021) recognised that the supply of homes in London has failed to keep up with demand and that there are a complicated set of factors which make increasing housing supply in London challenging. But it goes on to say that building new homes will remain a priority in London, that a bold approach is needed to boost housebuilding and that partnerships with the private sector could be the key to unlocking housing aspirations for the boroughs. It concludes that public / private partnerships have the potential to unlock significant developments, bringing wider economic and social benefits to an area, in addition to much needed new homes.
- 5.29 In March 2024, the Government directed the Mayor of London to carry out a review of the policies in the London Plan that are holding housing delivery back including industrial land and opportunity areas. The Government expects that the review is concluded by 30 September 2024 and that any recommended changes are rapidly advanced as alterations to the current London Plan.

Impacts on the Construction Industry

- 5.30 It is evident that housing delivery is yet to return to normal in Lewisham. This is reflective of the national housebuilding situation. Leading up to and following Brexit on 31 January 2020, skills shortages, the flow of goods and materials between the UK and the EU and extra administrative burdens add to the cost and inhibit the functioning of the UK construction industry. Off-site manufacturing, the increasing use of digital technologies and the growing urgency to address climate change are also having an impact on the construction industry.
- 5.31 Numerous restrictions have also been imposed upon the construction industry by the Covid-19 pandemic since the initial national lockdown started in March 2020. In Lewisham, like elsewhere, local businesses temporarily stopped trading, construction activity on development sites paused, new phases of construction were delayed, there was a drop in the number of planning applications submitted to the Planning Service and some CIL payments were deferred. Whilst these restrictions have now been lifted, it is uncertain as to how well the construction industry has bounced back.
- 5.32 The New Homes England statistics for 2022-23 demonstrates that housebuilding starts and completions were down across the nation as a result of the impact of tough economic conditions on the housebuilding industry over the past year. This is inclusive of build cost inflation, rising labour costs, material availability, building remediation issues and the duty to support tenants through a cost-of-living crisis, all of which hindered investment in new homes, leading to stalled or stopped schemes.
- 5.33 Construction costs have reached an all-time high and are predicted to rise further. A Knight Frank Report in 2023 stated that construction costs in England had risen by 24%

since 2020 and were predicted to rise a further 15% in the following 3 years. This has been felt even more acutely in London where construction costs are higher than the national average. The rising costs of construction has had a fundamental impact on the viability of development within Lewisham.

- 5.34 The full and combined impact and long term implications of Brexit, the Covid-19 pandemic and inflation pressures on the health of Lewisham's residents and the local economy could be felt for a number of years to come. Future monitoring will be needed so that delays to housing delivery can be identified quickly and that the long term impacts on the construction industry, and whether it can bounce back to pre-Brexit and pre-pandemic levels, can be understood.
- 5.35 So overall, the Council's ability to set the pace of delivery on privately owned development sites is limited and delays in building are beyond the Council's control. The above factors have combined to result in significant under-delivery.

6. Boosting Housing Delivery

- 6.1 The Council acknowledges that there are few available interventions that can be introduced to "force" delivery or make a meaningful intervention on matters that sit outside of the planning system's ability to influence. Nevertheless, this section explores a range of activities that the Planning Service and other teams within the Council have implemented over the last few years, to minimise the risk of under-delivery. It also identifies key actions that should be implemented in the future, in order to help improve housing delivery performance. More in-depth details about the key actions and how they will be implemented, can be found in one consolidated table in Appendix 1.

Assessing Housing Delivery through Monitoring

- 6.2 From the analysis in Section 4, it can be assumed that there is a good past performance in housing delivery and a strong supply of housing for the future, but that delivery fluctuates. A range of monitoring activities are needed to assess the actual number of new homes being built.
- 6.3 **Majors and Strategic Projects Team** - this was established within the Planning Service in 2017 to focus specifically on major proposals for development. Planners in this team solely deal with major applications, the associated conditions and smaller applications which affect the major schemes. These Officers are the Council's main contact with the applicant and seeks to ensure that ongoing engagement and continuous dialogue between all parties enables each application and development to progress in a timely manner.
- 6.4 Being so involved in each application, the Officers gain an in-depth knowledge of applications (submitted, superseded, reserved matters and S73 applications), anticipated timescales, build outs and phasing as well as the number of residential units, non-residential floorspace and affordable housing to be delivered. They are a reliable source of intelligence and provide essential input when updating the pipeline of committed sites in the housing trajectory and the 5YHLS.
- 6.5 **Housing Completions Survey** - the Planning Service conducts a housing completions survey each summer and feeds the results back to the Greater London Authority (GLA). They in turn use this data to inform the next HDT. Desk based information and site visits are used to determine progress made on each site, i.e., whether they have started construction or have been completed. The data gathered from this survey is particularly important in informing the housing trajectory and the 5YHLS.

- 6.6 **Planning London Datahub** - The Planning Service has been working with the GLA to implement more efficient back-office systems that allows more automation of planning application and planning approval data. In the past considerable time and resources were spent inputting data from applications into the London Development Database. A new, more automated version, called Planning London Datahub, is now operational. Data from planning applications and planning approvals are fed directly from Lewisham' back-office system into the Datahub, with less need for Lewisham planners to carry out time consuming data entry.
- 6.7 **Maintaining Registers** - the Council has two statutory registers that are maintained and updated by the Planning Service. Lewisham first prepared a Brownfield Land Register in 2017. It provides up to date, transparent and consistent information about previously developed sites in the borough that are suitable for housing development. The Planning Service updates the register each December and uses the data to monitor the status of the development sites.
- 6.8 Lewisham first prepared a Self-build and Custom Housebuilding Register in 2016. It is a register of individuals and associations who are seeking to acquire serviced plots of land to build houses to live in. The Planning Service uses the data held in the register to understand the level of demand for self-build housing and whether or not self-build plots have been approved to meet demand.
- 6.9 **Authority Monitoring Report (AMR)** - many of the key actions arising from this Action Plan coincide with the monitoring that is already carried out through the AMR. In particular the AMR assesses the deliverability of sites against anticipated delivery timescales through the housing trajectory and 5YHLS and continually monitors both short term and long term delivery of housing, including consents that go unimplemented.

Key action 1	To assess the deliverability of sites against anticipated timescales through a range of monitoring practices.
<p>To help achieve key action 1 the Council will:</p> <ul style="list-style-type: none"> • Utilise data held by the Majors and Strategic Projects Team for monitoring purposes. • Complete the housing completions survey each summer and send completions data to the GLA. • Utilise data held in the Planning London Datahub to prepare the housing trajectory and 5YHLS and use completions data to inform the HDT. • Maintain and update the Brownfield Land Register and Self-Build Register and utilise the data for monitoring purposes. • Prepare a housing trajectory and 5YHLS and publish them as part of the AMR each winter, or at key stages in the plan-making process. 	

Determining Planning Applications

- 6.10 From the analysis in Section 4 and 5, it can be assumed that the Planning Service has a good track record in determining planning applications. However, it can take time to carry out pre-application negotiations, and given the scale and complexity of many sites in the Borough, this is to be expected. The timely determination of planning applications can help to maintain a good supply of housing land and help reduce the time it takes for sites to be delivered.
- 6.11 **Good Track Record** - Lewisham has a busy Planning Service, with a typical year experiencing submissions of more than 3,500 planning applications and about 500 tree applications. Lewisham can demonstrate a good track record of determining applications

and over the last few years' performance has remained strong. Table 7 shows that during 2021-22 all performance targets were exceeded.

Table 7: Planning application performance targets

Timescales for determining applications	Target	Performance in 2021-22
Majors determined within 13 weeks	80%	100%
Minors determined within 8 weeks	80%	92%
Other applications were determined within 8 weeks	85%	94%

- 6.12 **Pre-application Advice** - it is important to work with applicants, landowners and developers prior to a planning application being submitted to the Planning Service. Front-loading the planning process can improve the quality of a submitted planning application and thereby can save time later on when determining the application. The Council's webpage explains the range of pre-application advice that the Planning Service now offers, including:
- Get answers to simple queries about planning processes or checks (Planning Information Service).
 - Get advice on simple planning projects, (Duty Planner Standard Service).
 - Get advice on complex planning projects (including listed buildings) and a written summary (Duty Planner Complex Service).
 - Attend a pre-application meeting and get detailed written advice (Pre-Application Advice Service).
 - Get a dedicated planning officer assigned to your project and attend a series of design meetings for large-scale, comprehensive redevelopment schemes (Planning Performance Agreement Service).
- 6.13 **Planning Performance Agreements** - (PPA) is a project management tool used to manage planning applications. The Planning Service has secured many PPAs in the past including on complex schemes like Convoys Wharf. They enable the Planning Service and the applicant to agree the timescales, actions and resources necessary to process a planning application in a timely manner. They help to increase transparency in the planning application process and encourage collaboration between the Planning Service, the applicant, and other statutory consultees. At Lewisham, all strategic sites are managed via PPAs and PPAs are also secured for the delivery of schemes after permission has been granted to ensure smooth starts on site.
- 6.14 **Multi-disciplinary Advice** - the Planning Service seeks to ensure that applications not only bring forward new housing but also contribute to successful place-making. High quality design is a key priority for the Planning Service and the borough is becoming known for its exceptional quality of design and has won a number of design accolades in recent years. Design advice is provided as routine on individual pre-applications and planning applications. Major applications can also receive design advice from the Design Review Panel (DRP). This is an independent panel of design professionals, acting as an advisory body to the Planning Service, who meet regularly to review development schemes. Comments from the panel are fed into the assessment of pre-applications, planning applications and appeals. By doing this, developers can respond to panel advice and have a better chance to address design concerns early on in the process, which in turn leads to higher quality designs in final consented schemes. During 2021-22 the Panel provided design advice, cumulatively, on approximately 4,100 dwellings.
- 6.15 A multi-disciplinary approach is used to ensure that each development achieves its full potential. Applications can be considered at Majors Meetings, with input from different teams across the Council, so that different disciplines (e.g., design, heritage, transport, housing, open space, nature conservation and sustainability) can be considered simultaneously. Specialist advice is sought, where needed, to help determine applications.

- 6.16 For instance, advice is provided from heritage planners where an application may impact on Lewisham's rich and diverse heritage assets. The careful integration of heritage assets has played a successful role in many regeneration schemes such as the Deptford Project where a Grade II listed carriage ramp and railway arches were sensitively restored, and converted into local retail, cafe and commercial units. A new public square in front of the carriage ramp is open for use by the public including markets and events. The scheme also included a new residential block with 132 new homes, and the redevelopment of the station entrance. It was awarded the Best Heritage Led Scheme in 2017 in the London Planning Awards. Astra House is another example where Anthology has re-developed a Locally Listed former factory headquarters building into 44 flats and enhanced its architectural and townscape qualities, alongside the wider redevelopment of the Foundry site in Deptford for 316 residential units.
- 6.17 The Planning Service also works with other teams in the Council such as the Climate Resilience Team to ensure new developments respond to the ambitious target for the borough to be carbon neutral by 2030 and to comply with policy on energy efficiency etc. Their input on major applications pushes for higher standards to ensure new developments play their part to mitigate the worst impacts of the climate crisis.

Working within the Presumption in Favour of Sustainable Development

- 6.18 Now that the Council is in the presumption in favour of sustainable development, the Council should be taking proactive actions during its decision-taking.
- 6.19 **Genuinely deliverable schemes** - the Council will ensure that sites coming forward for consideration are granted consent when they are considered to be genuinely deliverable schemes. To achieve this, the Council should engage with developers to ascertain a degree of certainty that the proposals are justified, on the basis that they will actually be delivered in the short term (ideally within three years), and thereby have a positive influence on the measurement of the HDT. Evidence from applicants that clearly and robustly sets out the timeline for on-the-ground delivery will be important in this regard. Schemes that do not seek to achieve this should be discouraged, for instance sites being brought forward speculatively, solely by landowners without a developer on board and with the objective of subsequently selling the site post consent.
- 6.20 Developers will cite the presumption as a way to promote delivery of a specific site, or to increase its capacity, or to justify lower quality place-making / marginal schemes, or to push the boundaries in terms of site capacity (housing numbers); building height (taller development); quality of materials; and the provision of genuinely affordable homes.
- 6.21 However, in some instances the specific site will already be included within the housing trajectory and within the 5YHLS, and so their delivery is already being factored into the Borough's identified supply trajectory. An improved delivery timeline on the site, being justified through the presumption, will in most cases bring few benefits and will result in "double counting" for monitoring purposes.
- 6.22 Additional capacity on large, phased schemes may not necessarily quicken the delivery of the site, but rather contribute to the longer term housing supply. Once again, this will do nothing to help improve housing delivery performance in the next three years. Proposals that fail to demonstrate a "fast" delivery timeline will be of little value in positively responding to under-delivery. Likewise, proposals that seek to deliver large, complex sites (in terms of multiple ownership or site constraints that require mitigation) may not be likely to deliver in the short-term, and they too will not help in responding to under-delivery. The Council will monitor the decisions made as a result of the HDT including instances where there is evidence of persistent playing the system.

Key action**2**

To enable swift determination of planning applications through an efficient, proactive service and effective engagement with applicants.

To help achieve key action 2 the Council will:

- Meet performance targets by determining applications within set timescales.
- Encourage applicants to go through pre-application before submitting planning applications.
- Encourage major, phased and/or complex developments to enter into PPAs.
- Provide multi-disciplinary advice.
- Working within the presumption in favour of sustainable development.

Maximising Affordable Housing on Applicable Development Sites

- 6.23 From the analysis in Section 5, it can be assumed that increasing the number of houses is important, but the housing delivered also needs to be affordable to meet local housing needs. It is worthwhile spending time negotiating the maximum amount of affordable housing to deliver long term benefits for local communities.
- 6.24 **50% Affordable Housing** - One of the priorities in the Corporate Strategy 2022 -2026 is to tackle the housing crisis through the delivery of more genuinely affordable homes and through more mixed communities, with a range of tenure in private developments. In line with the adopted Core Strategy Policy 1, the Planning Service seeks the maximum provision of affordable housing with a strategic target for 50% affordable housing from all sources on sites capable of providing 10 or more dwellings. Hence, 50% affordable housing units is the starting point in pre-application discussions and section 106 negotiations. The Planning Service is also seeking to ensure the maximum number of genuinely affordable homes (comprising social rent and London affordable rent) from each planning consent, subject to financial viability.
- 6.25 **Financial Viability Reviews** - Major developments that are still under construction are periodically reviewed at specific trigger points, to check if improvements to the site's financial viability allow for additional financial contributions to be paid. So far there has been only one site where this has applied, at Renaissance at Loampit Vale. Other sites, especially large, phased sites that take multiple years to be delivered, have the potential to trigger more affordable housing in the future.

Key action**3**

To seek to maximise the amount of housing in applicable developments and in particular strive for higher amounts of genuinely affordable housing.

To help achieve key action 3 the Council will:

- Use the 50% target as the starting point for negotiations on all applicable developments.
- Conduct financial viability reviews and trigger more affordable housing, where applicable.

Keeping Up Momentum

- 6.26 From the analysis in Section 5, it can be assumed that to avoid further delays in site delivery, there is a need for momentum to be maintained, especially on large, phased sites and on affordable housing schemes that the Council has control over.
- 6.27 **Directing Growth to Specific Locations** - a number of streams of work are seeking to direct growth to sustainable locations within the borough. An SPD was adopted in January 2020 to provide guidance on the type, nature and design of development considered

appropriate for Surrey Canal Triangle. It has been used as a material consideration when determining planning applications within the area including the hybrid planning application for New Bermondsey.

- 6.28 The Regeneration Team are leading on major regeneration plans which will transform Catford town centre by:
- Rerouting the south circular A205 road, creating more pedestrian space, with trees and planting.
 - Making the heart of the town centre largely car-free, helping to improve air quality and road safety.
 - Creating segregated cycle lanes, more cycle parking and wider pavements to enable cycling and walking.
 - Creating a new civic hub and a cluster of affordable creative and cultural workspaces which will secure more day to evening footfall.
 - Redeveloping the Catford Centre for new retail space, while maintaining the town centre's current range of diverse and independent shops.
 - Replacing Milford Towers and providing new homes across the town centre.
- 6.29 The vision is for half of these homes to be affordable, with almost 1,000 new social homes. The process has included extensive consultation and the Catford Town Centre Framework forms part of the Local Plan evidence base. Funding from Round 3 of the Mayor of London's Good Growth Fund has been secured to enable Thomas Lane Yard to be developed. Section 106 funding has also been approved for pedestrian and cycle improvements between the two rail stations.
- 6.30 Consultants have prepared an A21 Development Framework to provide design guidance for development along, and close to, the A21, from Lewisham Town Centre in the north to the borough boundary with Bromley in the south. The Framework provides design guidance on how to optimise development sites, strengthen local character, improve the public realm and enhance walking and cycling facilities.
- 6.31 The Housing and Regeneration Teams have been working on a masterplan with the GLA for Bell Green/Lower Sydenham and lobbying for Opportunity Area status. A consultant team have been appointed to prepare a Vision Study for Lower Sydenham/Bell Green. The Vision Study identified the broad scale and scope for regeneration and change in the Lower Sydenham and Bell Green area, incorporating a new London Underground station. It will also help to support the case for the Bakerloo Line Extension along the Hayes line by demonstrating the transformational benefits that it will bring to the area.
- 6.32 Two further studies, the Lewisham Characterisation Study (2019) and the Draft Tall Buildings Study (2021), have been prepared. They seek to make optimal use of sites by considering the type, form and location of development that is suitable in the borough, taking into account surrounding character. The first study looks at using local distinctiveness to find the best locations for accommodating growth. The second study provides a methodology for determining the appropriate scale and location of tall buildings within the borough.
- 6.33 [Delivering Existing Affordable Housing Schemes](#) - in October 2023 Lewisham Homes, its staff and responsibilities transferred to the Council and a new Housing Directorate was formed to manage 19,000 homes across the Borough and provide support to the residents living in them.
- 6.34 An additional 1,000 new social homes have been pledged in the Corporate Strategy and the Strategic Development Team is now working to achieve this through various methods including the Building for Lewisham programme. The Council's Housing Strategy commits the Council to a key objective of delivering the homes that Lewisham needs,

recognising the need to use a variety of approaches and partners to leverage the maximum number of homes for the benefit of the borough.

- 6.35 The Strategic Development Team are working in partnership with their development partner and also working in partnership with Registered Providers, private developers and local communities to enhance the existing stock of affordable housing across the borough, to provide new affordable homes and to bring about large-scale transformative change with wider regeneration benefits in existing housing estates. Most recently The Council is seeking to boost the supply of homes in the Borough by engaging with self-builders and small builders to proactively consider options for bringing forward delivery of homes on small sites owned by the Council.
- 6.36 Work continues on the extensive programme to renew social housing estates and provide affordable housing on Council owned land, as summarised in Table 8.

Table 8: Delivering affordable housing schemes.

Site name	Progress so far
Heathside and Lethbridge	This site has been transformed since 2010 when an outline permission was approved. A total of 565 existing units have been demolished, to make way for 1,218 new units, a net increase of 653 units. The scheme was granted outline consent over 6 phases. To date Phases 1, 2, 3 and 4 have been completed, providing 782 new units. Phases 5 and 6 consisting of 436 new homes were granted consent in April 2019 and building work has now commenced. They are due to be completed shortly.
Excalibur Estate	This site was approved in March 2012 and has been experiencing a phased approach to demolition and rebuild across the site. A total of 178 existing units are to be demolished to make way for 362 new units, a net increase of 185 units. Phases 1 and 2, consisting of 57 new homes, have been completed. Further pre-app discussions are ongoing, and a new planning application will be submitted for the last phases in 2021.
Besson Street	In December 2015 the Council agreed to form a 50/50 Joint Venture vehicle with a partner (Grainger plc) to build bespoke build-to-rent homes. In July 2020, the Strategic Planning Committee considered a comprehensive mixed use development including 324 residential units and granted a resolution to approve, subject to a section 106 agreement. This scheme has been cited as a best practice case study in <i>Housing Partnerships: Delivering the homes that London needs</i> (2021).
Achilles Street	A ballot took place in November 2019, with a vote in favour of redevelopment, backed by 73% of eligible residents. It is estimated that around 450 homes in total could be built, although this number will be finalised through the design process. A minimum of 50% of the total homes built will be affordable, and a minimum of 35% of the total homes built will be Council-owned homes for social rent, with the aim to increase the number of social rented homes by as much as possible.
Former Ladywell Leisure Centre	The Council has been working in collaboration with Lewisham Homes, to deliver circa 102 homes at the rear of the site. The temporary permission has been extended to retain the PLACE/Ladywell building to the front of the site which is currently providing 24 homes for homeless families.
Former Tidemill School	The Council is working with Peabody to provide 209 new homes. This includes 117 new social rented homes, 41 low-cost shared ownership homes for first-time buyers and 51 homes for sale. The project started on site in November 2020 and is due for completion soon.

Key action

4

To maintain momentum in delivering housing schemes especially on large, phased sites and affordable housing schemes on public land.

To help achieve key action 4 the Council will:

- Complete studies and use them to inform future growth at Surrey Canal Triangle, Catford Town Centre, along the A21 corridor and Bell Green/Lower Sydenham.
- Deliver 1,000 new homes on Council land and progress estate regeneration schemes.

Identifying New Housing Schemes on Public Land

- 6.37 From the analysis in Section 5, it can be assumed that to boost housing delivery further, there is a need to broaden the opportunities for developing land in sustainable locations across the borough including on public land and on small sites.
- 6.38 **Housing Growth Team** - in 2018 the Council received approval for GLA funding from the Homebuilding Capacity Fund to establish a Housing Growth Team. It was comprised of staff from both housing and planning teams and is specifically tasked with preparing a pipeline of future Council led schemes. To date, the Housing Growth Team have completed two studies: A21 Development Framework and Small Sites Study and have also created a pipeline of more than 500 new homes.
- 6.39 **Infill Housing** - the Strategic Development Team has been investigating opportunities to re-develop garage land and other miscellaneous public land. A number of small developments have already been delivered directly or indirectly by the Council and/or Lewisham Homes, providing 53 affordable and intermediate homes on the land to the rear of Chiddingstone House, Lewisham Park and 27 affordable homes at Longfield Crescent Estate. The Council will continue to assess the development potential for new social rented homes as infill housing to replace Council-owned garage sites or underused land.
- 6.40 **Small Sites** - in September 2020, the Strategic Housing Team commissioned consultants to prepare a Small Sites Study, working in collaboration with the Strategic Planning Team and part funded by the GLA's Homebuilding Capacity Fund. The study seeks to provide design guidance for small sites development throughout the borough and aims to make the best use of available land by increasing and diversifying the delivery of new affordable homes and improving streetscapes and public realm of left over or under-developed plots of land. The Council has also commissioned RCKA to conduct a study of the development potential of small sites across the Borough, by using AI technology to identify suitable sites and classify them. The key findings, anticipated in September, and will form the basis for determining how best to progress the delivery of small sites in the future.

Key action

5

To investigate opportunities to bring forward new housing development on other public land and on small sites.

To help achieve key action 5 the Council will:

- Use the Small Sites Study and AI Study to encourage development on small sites.
- Optimise the use of small sites through infill development on garage and under-used public land.

Facilitating Growth through Planning Policies

- 6.41 From the analysis in Section 4 and 5, it can be assumed that housing growth should take place but only where it is located in sustainable locations and aligns with the spatial strategy set out in the new Local Plan. Site allocations in the Local Plan provide the opportunity to maximise housing delivery and promote housing growth in specific parts of the borough.
- 6.42 **Local Plan** - the Strategic Planning Team has already started to prepare a Local Plan that will eventually replace the current statutory development plan for the borough (made up of the 2011 Lewisham Core Strategy, 2013 Site Allocations Local Plan, 2014 Lewisham Town Centre Local Plan and 2014 Development Management Local Plan). It will provide a shared vision for the future of the borough through to 2040, with a clear framework in place to positively manage growth and new development in a way that respects the distinctive character and diversity of the borough. It will help to ensure that investment

decisions meet the aspirations of local communities and contribute to sustaining and creating inclusive, safe, healthy and liveable neighbourhoods, in addition to promoting the delivery of new homes.

- 6.43 The new Local Plan has progressed through various stages of the plan-making process. A Draft Local Plan 'Main Issues and Preferred Approaches' document was subjected to a Regulation 18 consultation between January and April 2021. A Proposed Submission Document was subjected to a Regulation 19 consultation between March and April 2023. It was subsequently submitted to the Secretary of State in November 2023. Hearing sessions are due to take place during June and July 2024, with debate taking place on the level of growth, sub areas and individual site allocations.
- 6.44 [Identifying New Site Allocations](#) - work on the Local Plan is underpinned by constant engagement with key stakeholders including ongoing informal discussions and meetings with a range of landowners and developers.
- 6.45 The Strategic Planning Team has worked in partnership with the GLA to identify new housing sites through past London-wide SHLAA exercises, including in 2013 and 2017. In the 2017 exercise, a total of 369 sites were assessed. At that time 43% of the sites assessed were found to be suitable for residential development. Since then, 66 of the sites identified through the London SHLAA have been brought forward as site allocations in the new Local Plan. Note some of the sites identified in the 2017 SHLAA have subsequently been delivered.
- 6.46 Overall, a total of 378 sites have been considered and 75 of the sites, equivalent to 20% of all sites considered, have been included in new Draft Local Plan as draft site allocations.
- 6.47 The site allocations will be instrumental in significantly increasing the delivery of new homes, to support the growth envisaged in the new Local Plan. Together with other large, consented sites and small site windfalls, the site allocations will seek to achieve the housing target of 1,667 units per year in the 2021 London Plan. Their delivery will also be an important component in being able to meet the HDT in the future.
- 6.48 Recognising that many of the site allocations in the adopted Local Plans have already been built out or have already gained planning consent, the Strategic Planning Team have sought to identify new sites suitable for development by carrying out two 'call for sites' consultations and inviting the public (including landowners, agents and developers) to submit sites for consideration in the new Local Plan. The consultations commenced in June 2015 and September 2018. 46 sites were submitted in 2015 and 39 sites were submitted in 2018. Three new sites identified through these consultations (that hadn't previously been identified through the London SHLAA work) have been brought forward as site allocations in the new Local Plan.
- 6.49 Following conversations with other teams within the Council and key stakeholders, the Strategic Planning Team also identified another 12 sites that have been brought forward as site allocations in the new Local Plan.
- 6.50 The Strategic Planning Team also carried out an early engagement exercise with landowners in August 2019, targeting 75 landowners on 31 of the draft site allocations. 17 responses were received, and these have been fed into the draft site allocations in the new Local Plan, helping to tailor the site allocations to the aspirations of the landowners.
- 6.51 [Catering for a backlog](#) – The Council is seeking to positively address under-delivery. Completions during 2020/21 to 2022/23 amounted to 1,530 compared to the London Plan target of 5,001 over the same period. This creates an undersupply of 3,471 new homes as

at the end of 2022/23. The Council is committed to delivering housing to resolve this backlog in a swift manner and has adopted the Sedgefield approach whereby the backlog is catered for by the end of the first 5 years (2028/29). This is equivalent to adding an additional 579 units to each year of the 5YHLS.

- 6.52 Some Councils choose to cater for the backlog supply across the full remaining Plan period (the Liverpool approach), taking longer for the backlog to be rectified. The Council has not chosen this approach given the significant need for housing across the Borough, making it imperative that we get back on track as quickly as we can.
- 6.53 It is noted that adding additional units to the annual target, to cater for both the backlog and an appropriate buffer could be considered as double counting. The Council considers there is merit in applying both of these to the first five years of the housing supply, thereby demonstrating that the Council is doing all it can and is positively seeking to significantly boost supply in the short term.
- 6.54 [Assessment to uplift supply](#) - the Additional Housing Supply Background Paper May 2024 explains how the Council, having conducted a thorough review of site allocations and other sources of supply, has come to the conclusion that meeting the full 20% buffer within the Borough of Lewisham is simply not possible. Instead, the Council has taken the approach of setting an *appropriate* buffer that can realistically be accommodated, doing all it can to secure an uplift in capacity and boosting the 5YHLS as much as possible.
- 6.55 The assessment found additional housing from existing sources of supply, with 539 units from 5 site allocations brought forward into Years 1 – 5 (whilst 319 units from 2 site allocations has been pushed back beyond Year 5). A further 660 units on 8 sites have been added to Years 1- 5, to align with current applications and pre-applications. 170 units from 3 sites have also been added to Years 1- 5, using average densities for their areas. Conversely, the assessment found that no uplift in capacity is possible on 58 site allocations.
- 6.56 The assessment considered additional capacity from windfall sites and found 260 units to add to Years 1 - 5 on 7 new windfall sites, to align with recent planning consents and pre-applications previously not anticipated. It also found that it is unlikely that delivery on small site windfalls can be increased above the London Plan target of 379 units p.a., as this already represents a step change in policy associated with small sites.
- 6.57 All nominated sites previously excluded through the new Local Plan process have also been reconsidered, but remain excluded. There are no obvious, additional sites within the Borough suitable for inclusion within the new Local Plan as site allocations. It is also noted that even if additional sites could be found it would be highly unlikely that these would be delivered in a 5-year period.
- 6.58 The assessment has comprehensively reviewed all site allocations and explored other sources of supply, and has found additional capacity to boost the housing supply by 1,310 new homes during Years 1 - 5. Despite taking a “no stone left unturned” approach, meeting a 20% buffer in full, (in addition to accommodating a significant number of new homes each year to cater for the backlog), is simply not possible. No further capacity exists to be able to boost the housing supply further, given the exhaustive approach taken. The Council has demonstrated that it is doing all it can do to secure an uplift in capacity and the new Local Plan will be able to accommodate a **17.5%** buffer.
- 6.59 The Council maintains that failing the Housing Delivery Test is not due to a lack of housing land supply. Currently 23 out of the 75 site allocations are located on sites with consents or resolutions to approve and there is a committed supply of approximately 14,639 new homes during the remaining Plan period.

To help achieve key action 6 the Council will:

- Carry out an assessment that considers uplifting the five-year housing land supply to address the need to meet the requirements of a 20% buffer.
- Continue to liaise with landowners and key stakeholders during the preparation of the Local Plan.

Stakeholder Engagement

- 6.60 From the analysis in Section 4 and 5, it can be assumed that the Council on its own cannot deliver sufficient housing needed to meet local housing needs. There is a need to engage with a range of stakeholders, to ensure that housing growth aligns with the aspirations of applications, landowners, key stakeholders, and the local community.
- 6.61 **Planning Consultations** - the Council carries out a variety of planning consultations to inform and support the preparation of the Local Plan and other planning documents, including Regulations 18 and 19 consultations.
- 6.62 A wide range of techniques were used to engage with the community including site notices, sending notification letters and emails to people on the consultation database, key stakeholders, landowners and leaseholders, holding a series of community meetings through Zoom and placing online consultation material on the Council's website including a short, reader friendly summary document to help local communities learn about the new Local Plan. More than 1,400 responses were received from residents, businesses, landowners, and other stakeholders. Their responses were used to refine the Regulation 19 version of the Local Plan and help make it a realistic, deliverable framework for growth. The consultation process was repeated again during the regulation 19 consultation.
- 6.63 In addition to formal consultations, a range of both formal and informal engagement activities with landowners and stakeholders has also taken place throughout the preparation of the Local Plan with the aim of identifying new housing sites and shaping / refining the site allocations contained within the Local Plan and updating the pipeline of sites on a frequent basis.
- 6.64 **Working with Key Stakeholders** - the Council has a Duty to Cooperate with a variety of stakeholders and the Planning Service carries out ongoing discussions, and engages with, a range of specific and general consultation bodies as well as Duty to Cooperate bodies such as the Mayor of London, Homes England, Environment Agency, Historic England, Natural England, Transport for London, Highways England, Office of Rail Regulation, Civil Aviation Authority, Marine Management Organisation, Clinical Commissioning Groups, Local Enterprise Partnership and the surrounding London Boroughs of Bromley, Southwark, Bexley, Tower Hamlets and the Royal Borough of Greenwich.
- 6.65 The Planning Service is preparing Statements of Common Ground with key stakeholders and has prepared a Duty to Cooperate Statement and a Consultation Statement, to demonstrate all of the consultation activities that have taken place during the preparation of the new Local Plan. These are living documents and they will be updated as the Draft Local Plan progresses towards adoption.
- 6.66 Frequent meetings are also held with a range of community groups, amenity societies, ward assemblies and Neighbourhood Forums. These will continue in the future, with the aim of fostering good relationships between the Council and the community it serves.

- 6.67 The Planning Service will also help to stimulate development activity and investment by continuing to attend Developers Forums; to discuss issues surrounding housing delivery and promote the development potential of sites in the borough.

Key action

7

To enhance partnership working to ensure the coordinated provision of housing.

To help achieve key action 7 the Council will:

- Meet with, and collaborate with, different teams within the Council, landowners, developers, key stakeholders such as the GLA and TFL, community groups and the general public.

Investing in Infrastructure

- 6.68 From the analysis in Section 5, it can be assumed that the provision of infrastructure is a prerequisite to housing growth. It is important to ensure sufficient funds are available to deliver infrastructure in a timely manner, to coincide with housing growth.
- 6.69 **Development Contributions Team** – the section 106 funds and CIL collected in the borough will ensure that developments delivered in Lewisham are accompanied by the infrastructure necessary to support growing communities. Developer contributions are an important financial resource for the Council and there is a direct correlation between the amount of development taking place in the Borough and the amount of section 106 funds available.
- 6.70 Lewisham CIL has been charged in the borough since April 2015. This is levied as a non-negotiable charge made on applicable developments and calculated on a per square meter basis. 70% of CIL receipts received go on to fund strategic infrastructure whilst 5% is spent on administration and 25% is retained for neighbourhood projects.
- 6.71 In 2021 the Development Contributions Team (DCT) was formed, and additional resources have been committed to expand the team, so that the signing of section 106 agreements can be made more efficient, collection of CIL section 106 payments can be speeded up, and to improve processes around the spend of section 106 and CIL monies which fund a range of infrastructure projects. This has the potential to speed up the delivery of development sites, in addition to providing much needed infrastructure across the borough. Enhanced in-house monitoring of section 106/CIL will also take place through the Infrastructure Funding Statement, to be published annually each winter.
- 6.72 **Infrastructure Delivery Plan (IDP)** - infrastructure is an important pre-requisite to the delivery of housing. The IDP sets out the Borough's future requirements for infrastructure, to accompany the growth envisaged in the Draft Local Plan. It provides details of specific projects including the lead organisation, location, expected timescales for delivery and funding requirements for each project. The IDP is a living document and will be updated as it is further developed with infrastructure providers and other stakeholders as the Draft Local Plan progresses towards adoption.
- 6.73 **Investment in Transport** - proximity to sustainable transport, car free developments, cycle storage, payments towards new bus routes, improvements to walking routes or electric car charging points are looked on favourably when determining planning applications. Planning consents should also seek to address deficiencies in the existing transport infrastructure and seek to implement Lewisham's Transport Strategy, Rail Vision, Cycling Strategy and Local Implementation Plan (LIP).
- 6.74 New, strategic scale transport infrastructure can be instrumental in boosting the delivery of housing. The Council is supportive of proposals to improve existing infrastructure

including the DLR, East London Line overground, metroisation, and new interchanges at Lewisham, New Cross Gate and Brockley stations. The Planning Service has been proactively securing and collecting section 106 contributions from developments around Lewisham town centre in order to support the future delivery of improvements to Lewisham railway station.

- 6.75 In recent years different teams from across the Council have worked successfully with TFL, the GLA and Southwark Council to lobby Government for the Bakerloo Line Extension (BLE), which has now been safeguarded (to Lewisham). This transport project will bring benefits to the borough and beyond. The Council is strongly supportive of it running on to Hayes (phase 2) as it would stop at Catford and Lower Sydenham where it has the potential to deliver transformational benefits to these places, through the delivery of new homes, as well as improving accessibility in the wider area.

Key action 8	To ensure the efficient operation of S106 and CIL so that infrastructure can be delivered in a timely manner alongside housing growth.
<p>To help achieve key action 8 the Council will:</p> <ul style="list-style-type: none"> • Intermittently update the IDP. • Monitor S106 and CIL funds on an annual basis through the Infrastructure Funding Statement and publish the IFS each winter. • Work with partners to implement transport improvements including the BLE (Phase 2) to Hayes. 	

7. Project Management

Key Actions

- 7.1 The Corporate Strategy 2022 - 2026 is committed to delivering more social homes for Lewisham residents, working to provide as many people as possible with safe, comfortable accommodation that they can be proud of and happy living in This Action Plan identifies a number of key actions to help achieve this and improve housing delivery performance in the future. Additional details relating to each key action can be found in Appendix 1, specifying:
- The range of activities that need to be carried out to achieve the key action.
 - The timescales that it will take to carry out the activities including in the immediate, short, medium and long-term.
 - The current status of the activity and whether it is already ongoing or has not yet started, (including where recurrent annual activities have not yet started for this year).
 - The teams who will be responsible for carrying out the activities, including specific teams within the Planning Service and other teams within the Council.
- 7.2 The key actions proposed in Appendix 1 cannot be implemented by one team alone and will require cross-departmental collaboration to boost housing delivery in the future. The Strategic Planning Team (Policy) will liaise with the lead teams responsible for the key activities, to monitor their progress and ensure progress is being made.
- 7.3 Whilst much of the under-delivery is not caused by a lack of housing sites and therefore remains out of the Council's control, the Council will continue to implement the actions in this Action Plan and will continue to work with development partners and the development industry, to influence the timely delivery of new homes on private development sites.

Appendix 1: Key Actions

Key actions identified in the previous Action Plan (2021) have been removed from this appendix where they have been completed.

Key action	Success Activities to be carried out to achieve key action.	Timescale Immediate (< 3 months) Short-term (3-6 months) Medium-term (6-12 months) Long-term (> 12 months)	Status	Project lead
Key Action 1: To assess the deliverability of sites against anticipated timescales through a range of monitoring practices	Utilise data held by the Majors Team for monitoring purposes.	Medium-term	Ongoing,	Planning Service: - Strategic Planning Team (Policy) - Majors and Strategic Projects Team - Business Improvement Team
	Complete the housing completions survey each summer and send completions data to the GLA.	Immediate	Ongoing, carried out annually.	
	Utilise data held in the Planning London Datahub for monitoring purposes including using completions data to inform the HDT.	Immediate	Ongoing	
	Maintain and update the Brownfield Land Register and Self-Build Register and utilise the data for monitoring purposes.	Medium-term	Ongoing, carried out annually.	
	Prepare a housing trajectory and 5YHLS and publish them as part of the AMR each winter, or at key stages in the plan-making process.	Medium-term	Ongoing, carried out annually.	
Key Action 2: To enable swift determination of planning applications through an efficient, pro-active service and effective engagement with applicants.	Meet performance targets by ensuring applications are determined within set timescales.	Immediate	Ongoing	Planning Service: - Development Management Team - Majors and Strategic Projects Team - Business Improvement Team - Strategic Planning Team (Policy) - Strategic Planning Team (Design and Conservation) Strategic Development Team
	Encourage major schemes to go through pre-application advice routes prior to submitting an application.	Immediate	Ongoing	
	Encourage major, phased and/or complex developments to enter into PPAs.	Immediate	Ongoing	
	Provide multi-disciplinary advice to ensure that the delivery of new homes is accompanied by high quality design and sustainable developments.	Immediate	Ongoing	
	Working within the presumption in favour of sustainable development.	Immediate	Ongoing	

Key action	Success Activities to be carried out to achieve key action.	Timescale Immediate (< 3 months) Short-term (3-6 months) Medium-term (6-12 months) Long-term (> 12 months)	Status	Project lead
Key Action 3: To seek to maximise the amount of housing in applicable developments and in particular strive for higher amounts of genuinely affordable housing.	Use the 50% target as the starting point for negotiations on all applicable developments.	Immediate	Ongoing	Planning Service: - Development Management Team - Majors and Strategic Projects Team - Strategic Planning Team (Development Contributions Team) Strategic Development Team
	Conduct financial viability reviews and trigger more affordable housing, where applicable.	As and when required	Ongoing	
Key Action 4: To maintain momentum in delivering housing especially on large, phased sites and affordable housing schemes on public land.	Complete studies and use them to inform future growth at Surrey Canal Triangle, Catford Town Centre, along the A21 corridor and Bell Green/Lower Sydenham.	Long-term	Partially completed	Strategic Development Team Planning Service: - Strategic Planning Team (Policy) - Strategic Planning Team (Design and Conservation) - Majors and Strategic Projects Team - Development Management Team
	Deliver 1,000 new homes on Council land and progress estate regeneration schemes.	Long-term	Ongoing	
Key Action 5: To investigate opportunities to bring forward new housing development on other public land and on small sites	Use the Small Sites Study and the AI Study to encourage development on small sites.	Long-term	Ongoing	Strategic Development Team Planning Service: - Majors and Strategic Projects Team - Development Management Team - Strategic Planning Team (Design and Conservation) - Strategic Planning Team (Policy)
	Optimise the use of small sites through infill development on garage and under-used public land.	Long-term	Ongoing	
Key Action 6: To ensure the site allocations in the Draft Local Plan maximise opportunities for housing delivery.	Carry out an assessment that considers uplifting the five-year housing land supply to address the need to meet the requirements of a 20% buffer.	Immediate	Completed	Planning Service: - Strategic Planning Team (Policy)
	Continue to liaise with landowners and key stakeholders during the preparation of the Local Plan.	Immediate	Ongoing	
Key Action 7: To ensure the efficient operation of S106 and CIL so that infrastructure can be delivered in a timely manner alongside housing growth.	Intermittently update the IDP.	Medium-term	Started	Planning Service: - Strategic Planning Team (Development Contributions Team) - Strategic Planning Team (Policy) - Development Management Team - Majors and Strategic Projects Team
	Monitor S106 and CIL funds on an annual basis through the Infrastructure Funding Statement and publish the IFS each winter.	Medium-term	Ongoing, carried out annually.	
	Work with partners to implement transport improvements including the BLE (Phase 2) to Hayes.	Long-term	Ongoing	

Key action	Success Activities to be carried out to achieve key action.	Timescale Immediate (< 3 months) Short-term (3-6 months) Medium-term (6-12 months) Long-term (> 12 months)	Status	Project lead
Key Action 8: To enhance partnership working to ensure the coordinated provision of housing.	Meet with, and collaborate with, different teams within the Council, landowners, developers, key stakeholders such as the GLA and TFL, community groups and the general public.	Immediate	Ongoing	Planning Service: <ul style="list-style-type: none"> - Business Improvement Team - Strategic Planning Team (Policy) - Strategic Planning Team (Design and Conservation) - Strategic Planning Team (Development Contributions Team) - Development Management Team - Majors and Strategic Projects Team