



Sustainable Development Select Committee

A21 Development Framework

Date: 15th September 2021

Key decision: No

Class: Part 1

Ward(s) affected: Lewisham Central, Rushy Green, Catford South, Whitefoot, Downham

Contributors: Head of Strategic Planning, Director of Planning

Outline and recommendations

Sustainable Development Select Committee is asked:

- a) To note the contents of the draft A21 Development Framework – Appendix 1
- b) To note the contents of the Baseline Document – Appendix 2
- c) Advise Mayor and Cabinet of any matters it wishes to be taken into account, or comments made, with regard to the content of the draft Framework, prior to the proposed public consultation.

Timeline of engagement and decision-making

30 th April 2019	Local Plan update to Sustainable Development Select Committee reporting on the Housing Capacity Fund Grant from the GLA.
Autumn 2020	Early stage discussion with Ward Councillors
Nov/Dec 2020	Pre-Production Consultation led by consultants

1. Purpose

- 1.1. The purpose of this report is to seek comment from the Sustainable Development Select Committee on the A21 Framework prior to Mayor and Cabinet being asked to approve it for consultation.

2. Summary

- 2.1. The A21 Development Framework will set a high level trajectory for change along the study corridor, assisting officers and other stakeholders by setting out the Council's high-level aspirations for new development in terms of its massing, layout, and potential functions and uses. As well as outlining high level landscape, public realm and transport improvements for the corridor.
- 2.2. Members are minded to note that as a Framework document the A21 Development Framework will not be part of the council's statutory Development Plan and will therefore not carry weight as a Development Plan Document (DPD) or Supplementary Planning Documents (SPD). However it may be a material consideration for planning decisions.
- 2.3. The requirements for consultation on policy documents were updated with the December 2020 Addendum to the Statement of Community Involvement (SCI) to align with statutory requirements. Whilst the Framework will not be formally adopted as an SPD we will however carry out public consultation requirements in line with those requirements set out in the SCI addendum for SPD documents. This requires a minimum of 4-week public consultation on the draft.
- 2.4. This report also outlines the consultation carried out on to date on the project, summarises the contents of the draft Framework and provides detail on the nature of the proposed consultation.

3. Recommendations

- 3.1. Sustainable Development Select Committee is asked:
 - a) To note the contents of the draft A21 Framework Document – Appendix 1
 - b) To note the contents of the Baseline Document – Appendix 2
 - c) Advise Mayor and Cabinet of any matters it wishes to be taken into account, or comments made, with regard to the content of the draft Framework, prior to the proposed public consultation.

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4. Policy Context

4.1. Planning Policy

London Plan March 2021

4.1.1. The London Plan forms part of Lewisham's Development Plan and sets out the spatial strategy for Greater London over the next 20-25 years. The document also sets out the Mayor's vision for Good Growth – growth that is socially and economically inclusive and environmentally sustainable.

4.1.2. Good Growth Policies include:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

4.1.3. Policy H1 Increasing housing supply - sets the ten-year targets for net completions for each local planning authority. Lewisham's target is 16,670 new homes over ten years or 1,664 per annum. This represents a significant increase from our previous annual housing target of 1,385.

Lewisham's adopted Local Plan

4.1.4. Lewisham's current spatial strategy in its adopted Core Strategy Development Plan Document (June 2011) identifies the northern section of the A21 from Lewisham town centre to Catford town centre as a Regeneration and Growth Area. It also identifies a large section of the A21 to the South as an Area of Local Regeneration.

Spatial Policy 1

Lewisham Spatial Strategy

1. *All new development will need to contribute positively to the delivery of the vision for Lewisham (see Section 4) and the strategic objectives (see Section 5).*
2. *The Lewisham Spatial Strategy will be achieved by applying the following spatial policies, which identify the type and quantity of development acceptable across the borough:*
 - a. *Regeneration and Growth Areas covering key localities within Lewisham, Catford, Deptford, New Cross/New Cross Gate (Spatial Policy 2, Section 6.2.1)*
 - b. *District hubs covering the District town centres of Blackheath, Forest Hill, Lee Green and Sydenham, and their immediate surrounding residential neighbourhoods (Spatial Policy 3, Section 6.2.2)*
 - c. *Local Hubs covering Brockley Cross, Hither Green, and Bell Green (Spatial Policy 4, Section 6.2.3)*
 - d. *Areas of Stability and Managed Change for the remaining areas of the borough (largely residential) including a Local Regeneration Area focusing on parts of Whitefoot, Downham and Bellingham wards, including Downham District town centre and Southend Village, Bromley Road (Spatial Policy 5, Section 6.2.4)*

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Lewisham's draft Local Plan

- 4.1.5. The A21 is identified in the draft Local Plan Regulation 18 stage "Main Issues and Preferred Approaches" as a strategic corridor for intensification and change with many new site allocations located along its route.
- 4.1.6. Policy OL1 Delivering an Open Lewisham (spatial strategy) states:
- A. *The Council will work positively and alongside local communities and community groups, public and private sector stakeholder, development industry partners and the wider public to realise the Vision for Lewisham, and to deliver the strategic objectives for 'An Open Lewisham as part of an Open London' by:*
- d. *Facilitating new development along the north-south A21 corridor...*
- 4.1.7. This higher level policy then informs policies within Part Three of the plan - Lewisham's Places:
- LCA4 A21 Corridor – Central Area
 - LSA4 A21 Corridor – South Area
- 4.1.8. The A21 Development Framework responds in a proactive manner to these policies and others by providing a high level vision for the A21, underpinned by a series of objectives to achieve the vision, a development framework to shape its physical form and guidance for the implementation of these objectives.

4.2. **Council strategies**

- 4.2.1. The Council's Corporate Strategy (2018-2022) outlines the Council's vision to deliver for residents over the next four years. Building on Lewisham's historic values of fairness, equality and putting our community at the heart of everything we do, the Council will create deliverable policies underpinned by a desire to promote vibrant communities, champion local diversity and promote social, economic and environmental sustainability. Delivering this strategy includes the following priority outcomes that relate to the principles within the A21 Development Framework:
- **Tackling the Housing Crisis** – Providing a decent and secure home for everyone.
 - **Building an Inclusive Economy** – Ensuring every resident can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.
 - **Making Lewisham greener**- Everyone enjoys our green spaces and benefits from a healthy environment as we work to protect and improve our local environment.
- 4.2.2. Lewisham's Housing Strategy (2020-2026), includes the following themes that relate to the Framework:
- Delivering the homes that Lewisham needs
 - Preventing homelessness and meeting housing need
 - Improving the quality, standard and safety of housing
 - Supporting our residents to live safe, independent and active lives
 - Strengthening communities and embracing diversity.
- 4.2.3. The A21 Development Framework addresses the above by providing guidance on developing new homes in the borough – many of which will be genuinely affordable which respond positively to the differing character along the corridor. The document also provides advice on high level landscape, public realm and transport

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improvements, creating greener more sustainable development and helping to improve our local town centres.

5. Background

5.1.1. The Council made a successful bid to the Greater London Authority (GLA) Homebuilding Capacity Fund to fund the following three projects:

- **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.
- **A21 Development 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.
- **Small Sites 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.

5.1.2. Between November 2019-January 2020 the Council held a competitive tender process for the A21 Development Framework using the GLAs Architectural Design and Urbanism Panel (ADUP) framework. Muf art/architecture were awarded the contract in January 2020.

5.1.3. Unfortunately the COVID pandemic had a significant impact on the Muf art/architecture resourcing with key personnel directly affected by the pandemic. Despite the Council being responsive to this and agreeing a number of extensions to the project programme Muf art/architecture were unable to deliver the necessary outputs to a sufficient quality as outlined within the project specification. As such both parties agreed, given the extraordinary circumstances that the best way to move forward would be to terminate the contract and allow the Council to move forward with alternative options.

5.1.4. As a result of the work completed by Muf art/architecture the council had a robust baseline analysis, some good initial public consultation work and the initial outputs of a robust framework approach.

5.1.5. Following this the Council agreed with the GLA to extend the funding deadline and allow the Council to appoint an alternative consultant to complete the project with the remaining budget. The funding deadline for the Homebuilding Capacity Fund was due to expire at the end of March 2021.

5.1.6. The extension to the funding was agreed with the GLA on the basis of:

- a) That these were extraordinary circumstances and not within the control of the council
- b) That a revised brief would be issued to reduce the scope of the project to deliver a development framework instead of an SPD thus ensuring the work could be delivered within the limited budget available
- c) The project timeline for completion would be very compact to avoid prolonging the delay as much as possible beyond the original end of March 2021 deadline.

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- d) Ensuring that any procurement process would be as swift as possible to meet the demands of the above.
- 5.1.7. A single Tender Action was approved in March 2021 and Hawkins Brown who had come 2nd in the original A21 Framework tender process were appointed to complete the project.
- 5.1.8. Following the publication of the committee calendar a further extension to the funding was agreed with the GLA based on an assumption that the project will be successfully completed by the end of the calendar year. If that does not take place and no alternative agreement is reached with the GLA, the Council may need to fund the delivery of the project itself. This is currently unbudgeted. Officers will continue to liaise closely with the GLA to mitigate any risk of this happening.
- 5.1.9. Members should also not that during the project TFL design staff working on the project definition of the A21 were furloughed and unable to feed into the project through its duration. The A21 is a Red Route and ownership, management and maintenance lies with TFL. Following ongoing budget pressures TFL confirmed that they can only work on committed/funded projects and were unable to commit resources to the A21 project. As such the project scope was revised accordingly and whilst the Development Framework sets out initial thoughts and aspirations for the re-configuration of the road and junctions it cannot be tested thoroughly at this stage without partnership working with TFL. This could be picked up at a later date with agreement from TFL.

6. Pre-production Consultation

- 6.1. During the Baseline stage the then appointed consultants Muf architecture carried out consultation at an early stage of the A21 Development Framework. This included:
- Telephone/Video Conference Calling
 - Strategic and Third Sector organisations – Organisations with a stake in the development of the A21 corridor such as TFL, Phoenix Housing and the RCIG Catchment Partnership were invited to on-line meetings to align the ambitions of the Framework with existing and emerging directives.
 - Ward Councillors – Councillors from all wards within the study area were contacted, those from Lewisham Central, Rushy Green and Whitefoot provided detailed feedback using this opportunity to highlight areas of concern including issues around housing, the environment, traffic difficulties and the need for amenities were emphasised.
 - Email questionnaire
 - On completion of the baseline research, the emerging framework was made public via Lewisham Council's website and an email questionnaire was sent to an extensive list of Lewisham-based community organisations and businesses along the A21 Corridor.
 - Critical Friends
 - The design team shared baseline findings for critical review with local organisations recognised to take an active role in local history, the environment and those concerned with cycling and walking
 - Commonplace website
 - Public consultation was held on the baseline research and emerging ideas for the Framework. The website attracted 2,251 visitors, with 54 responses on specific issues within the corridor.
- 6.2. Please refer to A21 Baseline Study (Appendix 2) for further details

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- 6.3. Throughout the production of this work the consultants held a selection of discussions with LBL planning officers including those from Development Management, Conservation, Highways, Trees, Sustainability and Policy.

7. A21 Development Framework Summary

- 7.1. The A21 Development Framework provides a high level strategic vision for the A21 study area, underpinned by a series of objectives to achieve the vision, a development framework to shape its physical form and guidance for the implementation of these objectives.
- 7.2. The site study stretches from Lewisham Town Centre in the north to the borough boundary with Bromley in the south. In order to avoid duplication and any potential confusion the A21 Development Framework does not provide further guidance for areas covered by the Catford Framework or Lewisham Town Centre Local Plan. Lewisham Hospital is also excluded from the scope of this study.
- 7.3. The Framework is split into four main chapters; Introduction and Vision, Overarching Guidance, Character Area Frameworks, Site Guidance:
- 1) Introduction and Vision
 - Project introduction
 - Using the document
 - Vision statement – Capturing the overarching intention of the A21 Development Framework
 - Guiding principles – Addressing the many opportunities of the corridor as a whole. They are a set of specific thematic objectives that can be used to measure any proposals for the A21 area.
 - 2) Overarching Guidance - Provides overarching guidance that applies to all plots that front the A21
 - Overview
 - Building heights
 - A distinctive public realm
 - Architectural character
 - Air Quality
 - 3) Character Area Frameworks – The study area is divided into a series of 7 distinct character areas. Each Character Area Framework describes the principal tactical moves that will strengthen that area’s function and distinctiveness.
 - Lewisham Town Centre
 - Ladywell Village
 - Lewisham Park, Hospital and Greens
 - Rushy Green and Catford
 - Bellingham
 - Southend
 - Downham Centre

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- 4) Site Guidance – Guidance pertaining to individual sites is provided in two forms. Topological Guidance covers a variety of conditions within the character areas, and are organised by site type and scale of intervention. The potential development site section comprises indicative concept schemes and capacity studies indicating design principles and potential number of homes.

- Typological Guidance
- Site Capacity Studies

7.4. The A21 Baseline Study precedes and forms the evidence base for this framework and underpins this document's recommendations. Both documents should be read with reference to each other. See Appendix 2

8. Consultation

8.1. Subject to approval by Mayor and Cabinet on 14 September 2021, the consultation process will run for four weeks and will involve:

- Consulting (by digital mail-out) specific Consultation Bodies, General Consultation Bodies and Other Consultees (to the extent that the Council considers the proposed subject matter affects that body). This would include specific community groups and local organisations.
- Ensuring that the Development Framework and the other material required to support it are accessible on the Lewisham website, and posted to selected online forums and groups to access as many Lewisham residents as possible. The Framework and other material will be accessible at suitable libraries should Covid restrictions allow.
- In addition to the above we will aim to consult as broadly as possible with the community by arranging online virtual sessions to discuss and comment on the guidance.

8.2. After the 4 week consultation period, all representations received will be considered and a final version of the Framework will be prepared for consideration at a future meeting of Sustainable Development Select Committee and reported for adoption by Mayor and Cabinet.

9. Financial implications

9.1. The Framework and supporting documents will be published electronically on the Council's website and only limited hard copies will be produced, these being funded from within the agreed Planning Service budget.

9.2. The cost of developing the Framework is funded through the GLA's Homebuilding Capacity Fund, and the GLA has confirmed its agreement to carry forward funding in order to complete the project by the end of the calendar year.

9.3. There is a small risk that the Council will have to cover costs of approximately £45k if the project isn't completed by the end of the calendar year. The service is liaising closely with the GLA to mitigate this risk.

10. Legal implications

10.1. The Council must comply with their Addendum to the Statement of Community Involvement which sets out how the authority will consult and engage with individuals, communities and other stakeholders

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- 10.2. The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the main steps in the procedure for the production and adoption of planning documents, as explained in the report.
- 10.3. Section 9D of the Local Government Act 2000 states that any function of the local authority which is not specified in regulations under subsection (3) is to be the responsibility of an executive of the authority under executive arrangements. The Local authorities (Functions and Responsibilities (England) Regulations 2000 specifies that certain functions relating to Development Plan documents are by law the responsibility of the Council. No specific reference is made to the preparation of a Development Framework in the Regulations and as it is not a Development Plan Document it is therefore an executive function.
- 10.4. The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 10.5. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
- 10.6. It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed at 12.4 above.
- 10.7. The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 10.8. Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:
<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>
<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>
- 10.9. The Equality and Human Rights Commission (EHRC) has previously issued five guides

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for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty: A guide for public authorities
4. Objectives and the equality duty. A guide for public authorities
5. Equality Information and the Equality Duty: A Guide for Public Authorities

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

<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance#h1>

11. Equalities implications

- 11.1. The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.
- 11.2. The A21 Framework does not have any direct equalities implications.

12. Climate change and environmental implications

- 12.1. There are no direct environmental impacts arising from this report.

13. Crime and disorder implications

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

14. Health and wellbeing implications

- 14.1. There are no direct implications relating to health and wellbeing issues.

15. Conclusion

- 15.1. Sustainable Development Select Committee is asked:
 - d) To note the contents of the draft A21 Framework Document – Appendix 1
 - e) To note the contents of the Baseline Document – Appendix 2
 - f) Advise Mayor and Cabinet of any matters it wishes to be taken into account, or comments made, with regard to the content of the draft Framework, prior to the proposed public consultation.

16. Background papers

- 16.1. Development Management Local Plan
<https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/development-policies/development-policy-documents>

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- 16.2. The Publication London Plan December 2020 <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/publication-london-plan>
- 16.3. Good Quality Homes for All Londoners Housing SPG Consultation Draft October 2020 <https://consult.london.gov.uk/good-quality-homes-for-all-londoners>
- 16.4. Sustainable Development Select Committee report dated 30th April 2019. Reference Local Plan Update to the Council's award of funds from the Homebuilding Capacity Fund can be found at paragraph 9.3 in the report here:
<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=136&MId=5561&Ver=4>

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19. Comments for and on behalf of the Director of Law, Governance and HR

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20. Appendices

20.1. Appendix 1 – A21 Development Framework

20.2. Appendix 2 – A21 Baseline Study

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