

Lewisham Local Plan

Regulation 18 Consultation Statement

Report on the consultation of the
Lewisham Local Plan: Main Issues and Preferred
Approaches document

September 2022

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1 Background

1.1 About this Consultation Statement

- 1.1.1. Lewisham council (“the council”) is preparing a new Local Plan. This involves a review and update of the council’s adopted planning policies. The National Planning Policy Framework (NPPF) makes clear that local plans should “be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”.
- 1.1.2. This Consultation Statement details how Lewisham council undertook public consultation at the early stages of the plan-making process and how consultation responses were used to inform the preparation of the Local Plan. It focusses principally on the Regulation 18 stage consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document (“draft Local Plan”) and supporting materials, which was carried out from 15th January to 11th April 2021. Information is also included on engagement activities carried out prior to and following this consultation.
- 1.1.3. This report should be read together with the Regulation 18 Consultation Statement: Report on the Consultation on Main Issues (March 2020). The report provides details about consultation carried out during the initial stages of the Local Plan review. This includes the first Regulation 18 consultation on the Main Issues held from 9th October to 20th November 2015.
- 1.1.4. This Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). These regulations require the council to publish a statement setting out which bodies and persons were invited to make representations under Regulation 18; how those bodies and persons were invited to make such representations; a summary of the main issues raised by those representations; and how those main issues have been addressed in the Local Plan.

1.2 About the Lewisham Local Plan

- 1.2.1. The Lewisham Local Plan is the main strategic planning policy document prepared by the council. It sets out a long-term development and investment strategy for the Borough along with planning policies and guidelines to implement this. The Local Plan must be prepared in accordance with the processes and procedures set out by legislation.
- 1.2.2. The Local Plan must be consistent with the National Planning Policy Framework (2021). The NPPF sets out the Government’s planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions.

- 1.2.3. The Local Plan must also be in general conformity with the London Plan, which is produced by the Mayor of London. The London Plan (2021) is the spatial development strategy for Greater London. It helps to ensure a coordinated approach to planning across London and provides a direction for London borough councils on what they should do in preparing local plans.

1.3 Local Plan review

- 1.3.1. Lewisham council currently has an adopted Local Plan. It comprises the Lewisham Core Strategy (2011), Site Allocations (2013), Development Management (2014) and Lewisham Town Centre Local Plan (2014) documents. The new Local Plan involves a review and update of these plans, which will bring them together into a single document.
- 1.3.2. The preparation of a local plan involves several key stages. These stages are prescribed by planning legislation. This includes the undertaking of several rounds of public consultation before a draft local plan can be submitted to the Secretary of State for an examination in public. The examination is overseen by an appointed Planning Inspector. A local plan can only be adopted and brought into force if it passes the examination. This means that the council has satisfied the legal and procedural requirements for preparing the plan and has also met the 'tests of soundness' set out in the National Planning Policy Framework.
- 1.3.3. The Planning and Compulsory Purchase Act 2004 (as amended) requires the council to publish a Statement of Community Involvement (SCI). The SCI is a document that sets how the council will inform and involve local communities and other stakeholders in the preparation of planning policies for the Borough, as well as the determination of planning applications.
- 1.3.4. The Planning and Compulsory Purchase Act 2004 (as amended) also requires the council to publish and maintain a Local Development Scheme (LDS). The LDS includes information on the planning policy documents the council intends to prepare along with the timescales for their production, including public consultation programmed at key stages in the plan-making process. The LDS helps to ensure that local residents, community groups and others with an interest in the Borough are informed about consultation opportunities.

Table 1.1 Key stages in the local plan process¹

Key stage	What is involved?
Regulation 18	Preparation of the local plan including public consultation on the scope of the local plan and the policy proposals
Regulation 19	Publication of the local plan and public consultation on the 'proposed submission document'
Regulation 22-25	Submission of the local plan and other information to the Secretary of State and Examination in Public
Regulation 26	Adoption of the local plan

2 What we consulted on

2.1 Initial Regulation 18 consultation on the Main Issues

2.1.1. An initial Regulation 18 stage consultation was held in 2015 to set the scope of the Local Plan review. The council carried out a six-week public consultation from 9th October 2015 to 20th November 2015. This involved a consultation on 3 documents:

- Lewisham Local Plan – Consultation on Main Issues
- Local Plan Sustainability Appraisal Scoping Report
- Infrastructure Delivery Plan - Framework Document

2.1.2. A consultation questionnaire was published alongside these documents. It included questions organised around the main policy topic areas in the Local Plan – Consultation on Main Issues Document. The public was invited to complete the questionnaire and submit it to the council for consideration.

2.1.3. A total of 41 written representations were made on the Local Plan – Consultation on Main Issues document. The representations covered a wide range of planning issues and policy areas. These included the spatial or borough development strategy, urban design and conservation, housing, employment, retail and town centres, community facilities, environment and transport. In addition, 4 responses were received on the Sustainability

¹ This is a summary of the key stages as prescribed by The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Appraisal Scoping Report and 7 responses on the Infrastructure Delivery Plan Framework Document.

- 2.1.4. The council has prepared a Regulation 18 Consultation Statement: Report on the Consultation on Main Issues (March 2020). This should be referred for further details about the initial Regulation 18 consultation including information about the consultation process and outcomes.

2.2 Gypsy and Traveller Sites Local Plan

- 2.2.1. The council previously committed to the production of a single-issue local plan to address identified local needs for gypsy and traveller accommodation. This was reflected in the adopted LDS including the LDS 2018. Several public consultations were undertaken to inform the preparation of a Gypsy and Traveller Sites Local Plan. Through the review of the LDS and publication of the LDS 2020, the council confirmed that it would cease production of this document and that policies regarding gypsy and traveller accommodation would instead be addressed through the Local Plan review.

- 2.2.2. Several public consultations were undertaken to inform the preparation of the Gypsy and Traveller Sites Local Plan, prior to its cessation. Further information on each is set out below:

- **Site Selection Process: Regulation 18 Stage 1 consultation (March/April 2016).** In March and April 2016 the council carried out a public consultation on draft parameters and criteria for the site selection process as well as a Scoping Report for the Integrated Impact Assessment. In July 2016, Lewisham's Mayor and Cabinet approved the final parameters and criteria (taking account of the consultation comments received).
- **Site Selection Process: Regulation 18 Stage 2 consultation (September/October 2016).** In October and November 2016 the council carried out a public consultation on two potential sites to accommodate gypsy and travellers as well as an Integrated Impact Assessment.
- **Preferred Site: Regulation 18 Stage 3 consultation (September to November 2018).** In September to November 2018 the council carried out a public consultation on a preferred site for gypsy and traveller accommodation (Pool Court) as well as an Integrated Impact Assessment.

- 2.2.3. Further information on the early stage preparation of the Gypsy and Traveller Sites Local Plan is available on the council's planning webpage. This includes the consultation documents, relevant Regulation 18 Consultation Statements and evidence base documents.

2.3 Call for Sites Exercises

- 2.3.1. The Local Plan includes site allocation policies. These are policies that establish land use principles and development guidelines for specific sites. Site allocations are strategic development sites which are integral to the delivery of the spatial strategy for the Borough. For example, they make provision for new housing, business space, community facilities or other infrastructure. Site allocations are in most cases larger sites of 0.25 hectares or greater in size.
- 2.3.2. To assist with the identification of sites to be included in the Local Plan, the council carried out several 'Call for Sites' exercises. These provided the public (including landowners and developers) with the opportunity to identify land that might be available for different types of development within the Borough. The public was invited to complete and submit a response form to the council setting out details of potential sites.
- 2.3.3. The council carried out its first Call for Sites exercise from 19th May to 30th June 2015. This was held prior to the initial Regulation 18 Consultation on Main Issues document. A total of 22 respondents submitted feedback in relation to 46 sites within the Borough.
- 2.3.4. The council carried out a second Call for Sites exercise from 19th September to 1st November 2018. This was held prior to the Regulation 18 consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document. A total of 27 respondents submitted feedback in relation to 39 sites within the Borough. The Call for Sites was advertised on the council's Citizen Space consultation platform. Contacts on the council's consultation database were also notified by email.
- 2.3.5. Following these Call for Sites exercises the council carried out a Landowner Site Survey from 29th August to 11th October in 2019. This was a targeted engagement with landowners of selected sites which were being considered for site allocations. This included sites where there were no extant planning consents. Through this engagement officers sought to understand whether sites were deliverable and developable within the plan period. The engagement provided landowners with the opportunity to discuss their future aspirations for sites and where relevant, likely timescales for delivery of site redevelopment in the future.
- 2.3.6. The council carried out a third Call for Sites exercise alongside the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches. This was held from 15th January to April 11th 2021. A total of 14 respondents submitted representations in relation to 16 sites. Information on the Call for Sites and site submission forms were provided on the Commonplace consultation platform.
- 2.3.7. For the third Call for Sites, it is noted that 2 of the submissions related to individual plots of land located within proposed site allocations identified in the Regulation 18 draft Local Plan (Lewisham Shopping Centre and Stanton Square LSIS). In addition, 2 of the submissions were for sites located adjacent to proposed site allocations and the council considered it

appropriate that these be absorbed into the respective allocations. The council did not consider it appropriate to assess the remaining 12 sites and for potential inclusion in the Regulation 19 plan. This is because the public would not have sufficient opportunity to comment on any site proposals. Furthermore, since the Regulation 18 consultation the council reviewed the site portfolio and considered there were sufficient sites to meet identified needs, including for housing and business space. These latest site submissions will be considered in a subsequent Local Plan review.

- 2.3.8. In addition to its own Call for Sites exercises the council collaborated with the Greater London Authority (GLA) on the preparation of the London-wide Strategic Housing Land Availability Assessment (SHLAA) 2017. The SHLAA was used to inform the preparation of the London Plan (2021) including the setting of the borough-level housing targets. The GLA carried out a Call for Sites exercise to inform the SHLAA which the council assisted in advertising. A total of 23 respondents from landowners and interested parties submitted responses to the GLA for 51 sites in Lewisham.
- 2.3.9. Sites submitted through council's Call for Sites and the London-wide SHLAA have been considered for inclusion in the Local Plan. The council has published a Site Allocations Background Paper. This should be referred for further information on the council's Strategic Housing Land Availability Assessment and site screening procedures and outcomes.

2.4 Evidence base documents

- 2.4.1. There is no statutory requirement for the council to consult on evidence base documents during the preparation of the Local Plan. However it has carried out consultation on a number of evidence base documents as part of its approach to early and effective engagement with the local community and other stakeholders during the plan process. The following documents have underpinned considerations for the spatial strategy and area-based policies in the Local Plan.

Lewisham Characterisation Study

- 2.4.2. The Lewisham Characterisation Study is one of the key evidence base documents informing the Local Plan. The study includes an analysis of the physical form of the borough, its history, places, streets, and buildings. The study helps to identify the key attributes of Lewisham's local character, how this character varies across the borough, and how this local distinctiveness might inform future approaches to managing growth and development.
- 2.4.3. The council carried out a public consultation on the on the draft Lewisham Characterisation Study from 25th March to 23rd April 2019. The consultation included several engagement events with stakeholders, including local residents and community groups. Consultation feedback helped to shape the content of this study, which also informed the direction of the Local Plan particularly the spatial strategy and sub-area objectives.

- 2.4.4. Further information on the consultation process and outcomes are set out in the Consultation Report - Lewisham Characterisation Study (June 2019).

Catford Town Centre Framework

- 2.4.5. The Catford Town Centre Framework is a key evidence base document informing the Local Plan and has been adopted by the council. The framework sets out a high-level placemaking vision for Catford Major Centre to support its regeneration and revitalisation. The Framework includes principles to guide development within the wider town centre area and on specific sites.
- 2.4.6. The Catford Town Centre Framework was informed by extensive community engagement and consultation. A dedicated engagement team (Team Catford) led this process. The final Framework was shaped by over 3,000 comments provided by a wide range of stakeholders including local residents, community groups and businesses.
- 2.4.7. Further information on the consultation process and outcomes are set out in the Consultation Statement - Draft Catford Town Centre Framework (April 2021).

New Cross Area Framework and Station Opportunity Study

- 2.4.8. The New Cross Area Framework and Station Opportunity Study (NXAF + SOS) is a key evidence base document informing the Local Plan and has been adopted the council.
- 2.4.9. The Area Framework covers an area of approximately 1 kilometre radius around New Cross Gate station. It analyses the existing character of the area and establishes a vision for its future development. It also illustrates opportunities for growth within a network of new and improved public transport connections, as well as walking routes and cycleways.
- 2.4.10. The Station Opportunity Study explores how a Bakerloo Line Station at New Cross Gate can complement the vision for New Cross. It includes an assessment of the optimal capacity and nature of development around the station, with a view to informing the new Local Plan. Opportunities to significantly improve the quality of the public realm and the environment of New Cross Road are also identified.
- 2.4.11. Public consultation was an integral part of the preparation of the NXAF + SOS. Consultation was organised around a number of key stages. The consultation programme included workshops, site visits, public drop-in events, presentations, exhibitions, library notices, and online consultations.
- 2.4.12. Further information on the consultation process and outcomes is set out in Chapter 7.2 of the NXAF + SOS.

A21 Development Framework

- 2.4.13. The A21 Development Framework is a key evidence base document informing the Local Plan and has been adopted by the council. It provides a strategy for the A21 corridor and the surrounding area. It includes parameters and guidelines for new development in terms of land uses,

massing and layout with an emphasis on the area's local and historic character. The Framework also provides a direction for future public realm and transport improvements.

- 2.4.14. The study area for the A21 Development Framework includes all of the A21 road that lies within Lewisham - stretching from Lewisham Major Centre to the borough boundary with Bromley in the south. In order to avoid duplication and any potential confusion the Framework does not provide guidance for areas covered by the Catford Town Centre Framework (2021) or Lewisham Town Centre Local Plan (2014). Lewisham Hospital and Lewisham Shopping Centre are also excluded from the scope of this study.
- 2.4.15. The preparation of the document was informed by pre-production engagement. The council also carried out a public consultation on a draft A21 Development Framework from 14th October to 12th November 2021. Over 300 comments were received from 30 respondents.
- 2.4.16. Further details on the consultation process and outcomes are set out in the Mayor and Cabinet reports from the meeting of 9th March 2022 along with the A21 Development Framework - Consultation Comments and Responses Log.

Topic based studies: Tall buildings and Open Spaces

- 2.4.17. The council consulted on studies for the selected policy topic areas of tall buildings, open spaces and on selected nature conservation sites. This was in response to the significant amount of public interest in these areas. The consultations were held following the Regulation 18 consultation carried out from January to April 2021. Further details are set out in Section 2.8 of this Consultation Statement.

2.5 Infrastructure Delivery Plan

- 2.5.1. The Infrastructure Delivery Plan (IDP) is a document that has been prepared to both inform and support the delivery of the Local Plan. The IDP identifies the different types of infrastructure that will be required to support the levels of growth planned within the Borough over the long-term. It will be critical to ensuring that there is appropriate provision of facilities, services and infrastructure to support sustainable development in Lewisham. The IDP is intended to be treated as a 'live' document and will be periodically reviewed and updated over time.
- 2.5.2. At the early stage of the Local Plan review the council prepared an Infrastructure Delivery Plan - Framework Document. This was subject to public consultation alongside the Regulation 18 Local Plan Main Issues document from 9th October to 20th November 2015. (See also Section 2.1).
- 2.5.3. Informed by the Framework Document, a draft IDP was prepared to support the Regulation 18 public consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document. The consultation was carried out from 15th January to April 11th 2021. The majority of work on the draft IDP took place between quarter four of 2018 and quarter four of 2019. It was

informed by the latest available studies, council service strategies, and early-stage feedback from infrastructure providers and delivery partners.

- 2.5.4. Subsequent to the Regulation 18 stage consultation, the draft IDP was reviewed and updated to include the latest population projections prepared by the Greater London Authority. The council then re-issued the draft IDP in November 2021 to internal and external stakeholders for their review. This provided them with an opportunity to consider the revised population projections and implications for infrastructure requirements. Following this, officers continued to engage with stakeholders to update the document where necessary. In addition, officers presented the draft IDP to Lewisham's Sustainable Development Select Committee at its meeting of 17th February 2022. The IDP has been updated taking account of feedback received from these latest rounds of stakeholder consultation and engagement.

2.6 Member briefings and committee meetings

- 2.6.1. Planning officers have engaged with the council's elected Members throughout the plan-making process. Members have been provided with opportunities to influence the scope and direction of the new Local Plan along with its detailed policies. Officers have engaged with Members formally through the key decision process and at committee meetings, and also informally for example, through Member queries or meetings.
- 2.6.2. During the early stages of the plan-making process officers facilitated a series of All Member Briefing Sessions. These sessions focussed on the main topic areas to be covered by the Local Plan. There were 5 sessions held in total with 2 in July 2018 and 1 in each of October 2018, July 2019, and February 2020. An overview of the sessions is provided below:
- Session 1 (July 2018). Introduction to the plan-making process and some of the key challenges and opportunities arising through the Local Plan review.
 - Session 2 (July 2018). Discussion on the direction of travel for the new Local Plan and potential options for the spatial strategy.
 - Session 3 (October 2018). Agreement of strategic objectives for the new Local Plan with Members and discussion around the emerging spatial strategy for the Borough.
 - Session 4 (July 2019). An overview of the draft development management policies and the draft site portfolio (i.e. potential site allocations). A package of information was circulated to all Members both before and after the session. Officers invited feedback from Members between 12th July and 18th December 2019.
 - Session 5 (February 2020). Presentation and discussion on the proposed 'Vision for Lewisham' along with the supporting visions and key priorities for the Borough's five-character areas.

- 2.6.3. Feedback received during the All Member Briefing Sessions helped to inform the preparation of the Local Plan.
- 2.6.4. In addition to the All Member Briefing Sessions officers have engaged with Members at committee and other meetings including:
- Sustainable Development Select Committee – Officers periodically attended Committee meetings throughout the plan preparation process. This included updates on the plan programme, discuss key priorities for the new Local Plan and to present findings of evidence base documents.
 - Strategic Planning Committee - Officers facilitated an information session on 20th October 2021. This included updates on the local plan programme along with a presentation and discussion on policy proposals for key policy areas flagged by the Committee. These included affordable housing, development design, building heights and green infrastructure.
 - Housing Retrofit Task and Finish Group – Officers met with Members of this group on 5th October 2021 to discuss how the Local Plan could better recognise and address opportunities around the sustainable retrofitting of buildings.

2.7 Regulation 18 consultation on the Main Issues and Preferred Approaches

- 2.7.1. The council carried out a Regulation 18 public consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document and supporting materials from January 15th to April 11th 2021. The documents were as follows:
- Lewisham Local Plan: Main Issues and Preferred Approaches
 - Proposed Changes to the Adopted Policies Map
 - Interim Integrated Impact Assessment (IIA) and IIA Non-Technical Summary
 - Draft Habitats Regulations Assessment
 - Draft Infrastructure Delivery Plan
- 2.7.2. The consultation provided the public with an opportunity to comment on the scope of the Local Plan, the key issues to be addressed by it and the council's preferred policy approaches. The public was also invited to comment on other policy options identified by the council (i.e. the 'reasonable alternatives') and to suggest additional policy options for consideration as work on the plan progressed.
- 2.7.3. Part 3, Part 4 and Part 5 of this Consultation Statement set out further details on the consultation process and outcomes, including information about how consultation feedback informed the preparation of the Regulation 19 Local Plan: Proposed Submission document.

2.8 Post Regulation 18 consultation

Seldom heard and hard to reach groups

- 2.8.1. During the Regulation 18 consultation, the council used a strategy to raise awareness about the local plan and engage with seldom heard and hard-to-reach groups, including Black and Minority Ethnic (BAME) communities. Despite these efforts the response rate from these groups was comparatively low. The council therefore carried out additional targeted engagement following the Regulation 18 consultation on the draft Local Plan. Further details are set out in **Section 4.5** of this Consultation Statement.

Evidence base documents

- 2.8.2. Throughout the plan-making process there was a significant amount of public interest in the policy areas of building heights (particularly tall buildings) and green infrastructure (including parks, open spaces and nature sites). This is reflected in the consultation response summary set out in Section 5 of this report. Informed by consultation feedback the council commissioned additional evidence base studies following the Regulation 18 consultation.
- 2.8.3. The council published a Tall Buildings Study Addendum and Open Spaces Review for the public to review and comment. The consultation materials were made available on the council's main consultation hub, Citizen Space. The consultation on both studies ran from 16th May to 17th June 2022. These were focussed consultations inviting the public to comment on:
- Technical information or evidence that should be considered to inform the studies; and
 - Factual errors or omissions.
- 2.8.4. The studies were used to inform the Regulation 19 Local Plan: Proposed Submission document.

3 How we consulted

3.1 Background

- 3.1.1. The Lewisham Statement of Community Involvement (SCI) (2006) and Addendum (2020) provides information on how the council will foster greater understanding of the planning process and ensure that the public has opportunities engage in local planning decisions. The SCI sets out when, how and who the council will consult during the plan making process and how the consultation results will be considered.
- 3.1.2. The council seeks to ensure that effective and inclusive consultation with local residents, community groups and other stakeholders is undertaken.

Whilst meeting its statutory obligations the council tailors public consultation using the tools available to it, taking into account:

- The nature and scope of a policy or guidance document;
- The nature and scale of a development proposal;
- Who the consultation is aimed at; and
- Resources available.

3.1.3. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the minimum statutory requirements for public consultation during the plan-making process.

3.2 Consultation and the Covid-19 pandemic

3.2.1. The Covid-19 pandemic has introduced challenges to the plan-making process. This is particularly around the undertaking of public consultation, including when Government social distancing guidelines are in place. For example, restrictions have made it difficult for local authorities to carry out traditional methods of consultation such as face-to-face public meetings and events. However, national planning guidance and legislation have been updated during the pandemic in response to this situation.

3.2.2. Planning guidance published on 13 May 2020 by the former Ministry of Housing, Communities and Local Government (now the Department of Levelling Housing and Communities) encouraged local planning authorities to assess their SCI to identify which policies were inconsistent with the Government's social distancing guidelines. The guidance also provided that authorities should introduce temporary amendments necessary to allow plan-making to progress, and that continue to promote effective community engagement by means which are reasonably practicable. The use of modern technologies including internet or online platforms was strongly encouraged.

3.2.3. The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 were introduced in response to Covid-19. These regulations made temporary changes to how documents were required to be made available to the public during the plan preparation and consultation process. Specifically, they temporarily removed the requirement for the council to: make documents available for public inspection at its principal office and at other places it considers appropriate; and provide hard copies of specified documents.

3.2.4. In response to changes in legislation along with national planning policy and guidance, the council amended its Statement of Community Involvement (SCI) in December 2020 by way of an Addendum. The changes to the SCI better enabled the council to progress the preparation of the local plan during the pandemic, with greater flexibility for the use of consultation tools.

3.3 Consultation tools used

- 3.3.1. The council's SCI provides information on the different tools that can be used to support public consultation on local plan documents. Table 3.1 below provides a summary of the tools used for the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches document and supporting materials.
- 3.3.2. The Regulation 18 consultation was open from 15th January to 11th April 2021. This period was significantly longer than the statutory minimum 6-weeks. The council invited the public to make formal representations using their preferred choice of the following options:
- Online via Commonplace, the Council's (externally hosted) online consultation webpage for the Local Plan at: <https://lewishamlocalplan.commonplace.is/>
 - By email to the Council's dedicated Local Plan email address at: localplan@lewisham.gov.uk
 - By post to the Council's main office at:
Laurence House, 1 Catford Rd, Catford, London, SE6 4RU
- 3.3.3. The vast majority of representations were duly submitted on time. Whilst some late representations were made these were accepted and given full consideration by officers.

Table 3.1 Regulation 18 consultation on Lewisham Local Plan: Main Issues and Preferred Approaches document and supporting materials

Statement of Community Involvement – tools available	Tools used	Reasons for tools not used
Physical copies of documents	No	To comply with Covid-19 social distancing guidelines
Lewisham council Website	Yes	-
Social media platforms	Yes	-
Posters and leaflets	Yes	-
Public notices / press releases	Yes	-
Email and post correspondence	Yes	-
Public meetings (on-site)	No	To comply with Covid-19 social distancing guidelines
Public exhibitions and drop-ins	No	To comply with Covid-19 social distancing guidelines
Internal consultation with elected Members/Service Areas	Yes	-
Other digital tools and telephone	Yes	-
Online consultation and engagement platforms	Yes	-

- 3.3.4. Further details on each of the tools is set out below. Documentary evidence of the consultation tools is included in the Appendix 1 of this Consultation Statement.

Physical copies of documents

- 3.3.5. Lewisham council's main office and other buildings were closed to the general public throughout the Regulation 18 consultation in accordance with the Government's social distancing guidelines. Therefore, physical copies of documents were not made available for public inspection as they normally would.

Lewisham council website

- 3.3.6. The consultation was supported by a dedicated webpage on the Council's website, accessed from the Planning webpages. This contained information on the draft Local Plan, how to inspect the consultation documents and submit representations.
- 3.3.7. There was an additional webpage on the Council's website (Citizen Space consultation platform) providing information on draft Local Plan, links to the externally hosted Commonplace consultation platform.
- 3.3.8. Citizen Space was also used as a registration portal for all of the Local Plan online information events. These were facilitated using the 'Zoom' video conferencing platform. There were 16 events in total with 492 registered participants. Further information on the sessions is set out in paragraph 3.3.28 below.

Social media platforms

- 3.3.9. The council's social media platforms were used to raise awareness of the Local Plan and to promote the consultation. Facebook and Twitter were used throughout the consultation period to advertise online consultation events and provide links to information, including the 'Commonplace' consultation hub. A dedicated [YouTube](#) channel for the Local Plan was also created. This was used to host videos of online consultation events, enabling people to view the sessions after they had taken place.

Posters and leaflets

- 3.3.10. Leaflets were used to raise awareness of the Local Plan and to promote the consultation. Leaflets were prepared for each of the 'character sub-areas' of the borough identified in the plan. These provided information about the areas and some of the key proposals for them. The leaflets were made available on the Commonplace online consultation hub. Officers also engaged with local community groups to ask for their assistance in promoting the consultation and circulating the leaflets to their networks.
- 3.3.11. A Summary Version of the Local Plan was made available to download from the Commonplace online consultation hub. This set out a short format plain English version of the Local Plan: Main Issues and Preferred Approaches

document. It was prepared to help those unfamiliar with planning to engage in the consultation.

Public notices and press

3.3.12. The council issued public notices to raise awareness about the Regulation 18 consultation. These notices included:

- Public notice in the News Shopper newspaper, including both the hard copy and digital (on-line) versions.
- A notice and article in the Spring edition of Lewisham Life, a magazine which is circulated to all households in Lewisham borough, approximately 116,000 households.
- Public notice included the Lewisham council's Residents Newsletter – this newsletter is a weekly circular which is e-mailed out to approximately 28,000 Lewisham residents.
- Public notices placed within or around sites included as proposed site allocations in the Local Plan: Main Issues and Preferred Approaches document.

3.3.13. There was also a series of new articles in the News Shopper newspaper, which broadly covers South East London and Kent. These articles discussed proposals for each of the character areas included in the Local Plan: Main Issues and Preferred Approaches document. The articles were not prepared or issued by the council but were nonetheless helpful in raising awareness about the consultation.

Email and post correspondence

3.3.14. Formal letters were emailed to contacts on the council's Local Plan 'consultation database' to notify them about the Regulation 18 consultation on the Main Issues and Preferred Approaches document and supporting materials.

3.3.15. Letters were also sent by post to landowners and leaseholders of sites proposed to be included as site allocations in the draft Local Plan. The letters notified relevant parties about the Local Plan consultation and opportunities to make representations. Addresses and contact details of landowners and leaseholders were acquired through Land Registry searches and the council's planning records. Letters were sent to stakeholders with land interests for the majority of site allocations. However in a limited number instances letters were not sent for the following reasons:

- Land was in council ownership and therefore notification was unnecessary and/or the council had or was in the process of engaging with leaseholders on its landholdings about future redevelopment proposals
- Significant delays encountered in acquiring information owing to General Data Protection Regulation (GDPR).

- 3.3.16. Emails or 'push notifications' were sent out to contacts on the Commonplace online consultation hub. These contacts were individuals who had previously engaged in council consultations (such as the Catford Town Centre Framework and Neighbourhood Community Infrastructure Levy) and consented to being notified about future consultations.
- 3.3.17. A dedicated Local Plan email address was set up and public were invited to email the planning policy team for further information about the consultation and to submit consultation responses if they preferred this format.

Post Regulation 18 consultation correspondence

- 3.3.18. Additional emails were sent to the prescribed 'specific consultation bodies' (i.e. statutory consultees) who did not submit representations on the Regulation 18 consultation on the Main Issues and Preferred Approaches document. An extension period of 4 weeks was given to these consultees to submit comments.
- 3.3.19. Copies of the letters sent for the original and extended consultation are attached in Appendix 1 of this Consultation Statement.

Public meetings, exhibitions and drop-in events

- 3.3.20. Officers were unable to facilitate face-to-face public meetings, exhibitions and drop-in events due to the Government's social distancing guidelines in place during the public consultation. However, a series of online information sessions were held as an alternative. This is discussed further below.

Internal consultation with elected Members and Service Areas

- 3.3.21. Officers engaged with elected Members throughout the early stages of the plan-making process. Further details are set out in this Consultation Statement – see Section 2, under sub-heading Member briefings and committee meetings.
- 3.3.22. Planning officers collaborated with officers in other council Service Areas throughout the early stages of the plan-making process. This included joint-commissioning and preparation of evidence base documents, policy preparation and review.

Other digital tools and telephone correspondence

- 3.3.23. Contact details for the council's Planning Service were made available to the public, including the Local Plan team email address and telephone. Regular correspondence was made throughout and following the Regulation 18 consultation with interested parties. This included emails, telephone calls and video-conferencing with landowners and developers.

Online consultation and engagement platforms

Commonplace consultation hub

- 3.3.24. The council set up a dedicated online consultation hub for the Local Plan using the 'Commonplace' platform. Commonplace is hosted externally and

does not comprise part of the council's own website. However, the council's planning and consultation webpages provided links to the Commonplace site and encouraged the public to visit it.

- 3.3.25. Commonplace was employed because of its functionality and ease of use, whether by mobile device, laptop or desktop computer. It is graphically engaging and allows users to easily navigate through consultation materials and submit responses. It also features a 'latest news' function which enables the council to advise registered users of updates, for example, of consultation activities. In addition, the council had successfully hosted public consultation events using Commonplace prior to the Local Plan consultation.
- 3.3.26. The Local Plan: Main Issues and Preferred Approaches document and supporting materials were all made available on the Commonplace site throughout the consultation. The website also provided supporting information such as links to the Local Plan evidence base webpage and details of online information sessions.
- 3.3.27. Commonplace mapping tool – pin drops, etc. different way of engaging in process and to make views known about local areas

Online information sessions

- 3.3.28. Officers facilitated a series of online information sessions using the 'Zoom' video conferencing platform. These were held in February and March 2021 during the consultation period. The sessions were promoted on the council's social media platforms, council webpages and the Commonplace site. The sessions were open to all members of the public with registration arranged via the council's main consultation webpage (Citizen Space).
- 3.3.29. There were 16 sessions in total covering different policy areas in the Local Plan. In response to the significant amount of interest in the 'character sub-areas' there were 2 sessions held for each. Overall, the sessions were attended by 492 participants. The sessions were recorded and uploaded to the Local Plan YouTube webpage.
- 3.3.30. Each session included a 'Question and Answer' period. Due to time constraints or need for clarifications, not all questions could not be answered at the sessions. However, officers provided written responses to all unanswered questions. These were uploaded to the Commonplace site following the sessions.
- 3.3.31. The breakdown of sessions is set out below.
- 4th February - Vision and strategy
 - 9th February - Design and heritage
 - 11th February - Economy and culture
 - 16th February - Green infrastructure and environment
 - 17th February - Housing
 - 23rd February - Community and transport Infrastructure
 - 1st March - Central area
 - 2nd March - North area

- 4th March - East area
- 8th March - South area
- 9th March - West area
- 11th March - Central area
- 15th March - North area
- 16th March - East area
- 17th March - South area
- 18th March - West area

4 Who we consulted

4.1 Background

- 4.1.1. This section of the report provides information on who the council consulted during the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches document.

4.2 Consultation database

- 4.2.1. Lewisham council's Planning Service maintains a database of individuals and organisation who wish to be contacted about the preparation of the Local Plan and other policy documents. The database is an important tool used to engage with a wide range of stakeholders and to ensure they are kept informed of consultation opportunities. All personal data gathered for the database complies with the Data Protection Act 1998.
- 4.2.2. The database has been regularly updated to ensure that all information held complies with the Act. Furthermore, the database has been reviewed to meet the quality standards of the European data protection law, the General Data Protection Regulation (GDPR), which came into effect on the 25th of May 2018. To ensure compliance, Lewisham's Planning Policy team notified everyone on the council's database providing an explanation on the need to update personal data and giving everyone the option to opt-in or out. The council sent several emails to everyone on the database, and information was provided on the changes and implications of the new Act. The responses received were stored as verifiable to allow for audit and to show how the council compliance with the GDPR requirements. In total, about 400 out of 4000 individuals and organisations responded, giving consent to remain on the council's database. This had a significant impact on the council's ability to raise awareness about the Local Plan, and efforts have since been made to increase the number of contacts on the database.
- 4.2.3. All personal data of those who did not respond and those who requested to opt-out have been permanently removed from the council's database. Therefore, the Council has not been in a position to notify these individuals or organisations about progress on the preparation of the Local Plan,

including those who may have submitted representations at the Regulation 18 stage in 2015. The council's database has been constantly updated to ensure compliance with GDPR requirements.

4.3 Prescribed consultation bodies

4.3.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) prescribe the bodies that must be consulted during the preparation of a Local Plan. These include 'specific consultation bodies' and 'general consultation bodies'. The relevant bodies for Lewisham are set out in the council's adopted Statement of Community Involvement.

4.3.2. The specific consultation bodies (also commonly referred to as 'statutory consultees') include:

- The Mayor of London
- Adjoining authorities (London boroughs): Bromley, Royal Borough of Greenwich, Southwark, Tower Hamlets
- The Coal Authority
- Environment Agency
- Historic England
- Natural England
- Marine Management Organisation
- Network Rail
- Highways England
- Transport for London
- NHS London / Clinical Commissioning Groups
- Homes England and Regulator of Social Housing
- Thames Water
- Electronic communications operators (e.g. telephone, mobile, broadband)
- Gas and electricity operators

4.3.3. The general consultation bodies include bodies which represent the interests of:

- Voluntary bodies some or all of whose activities benefit any part of the Borough, including Neighbourhood Forums and Amenity Societies
- Different racial, ethnic or national groups in the Borough
- Different religious / faith groups in the Borough
- Disabled persons in the Borough
- Persons carrying on business in the Borough
- Different age groups in the Borough
- Different equalities groups

4.4 Duty to Cooperate

4.4.1. The Duty to Cooperate was introduced by the Localism Act 2011, and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities in England and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of a local plan. For Lewisham, the Duty to Cooperate bodies include:

- Environment Agency
- Historic England
- Natural England;
- Mayor of London
- Civil Aviation Authority
- Homes England and Regulator of Social Housing²
- Clinical Commissioning Groups established under the National Health Service Act 2006
- Office of Rail Regulation
- Transport for London
- Highways England
- Marine Management Organisation
- Adjoining authorities (London boroughs)

4.4.2. The council has fulfilled its Duty to Cooperate throughout the plan-making process. This includes formal consultation at the Regulation 18 stage as well as continuous and ongoing engagement with stakeholders. This includes work on the preparation of evidence base documents, the Infrastructure Delivery Plan (IDP) and early stage review and feedback of the draft Local Plan.

4.4.3. The council has prepared a separate Duty to Cooperate Statement, which should be referred for further details.

4.5 Seldom heard and hard to reach groups

4.5.1. For the Regulation 18 consultation on the Local Plan: Main Issues and Preferred Approaches, a targeted outreach strategy was used for 'seldom heard' communities and hard-to-reach groups, including Black and Minority Ethnic (BAME) communities. The strategy was developed by communications consultants working with council officers. As part of this strategy a contact list of 219 key stakeholder organisations within the Borough was identified. Officers emailed these organisations and requested support in promoting the consultation to their wider network as well as encouraging members to attend consultation events and comment on the Local Plan consultation.

- 4.5.2. A package of promotional documents was sent the organisations to assist them in promoting the consultation. This included summary leaflets for the Local Plan 'character area' policies, shareable graphics, links to the Commonplace consultation website and information about how to get involved. Officers requested that the organisations circulate information using their social media accounts, e-mail contact lists and any virtual newsletters due to be published during the consultation period.
- 4.5.3. Despite this strategy and approach to engage the with seldom heard and hard-to-reach groups, the response rate was low as evidenced by the disproportionately low proportion of Commonplace engagements made by individuals identifying as BAME.
- 4.5.4. The council therefore commissioned consultants to carry out an additional programme of targeted consultation with seldom heard and hard-to-reach groups. This was undertaken following the Regulation 18 consultation. The project team facilitated 10 consultation events. These were held in places of interest around the Borough (as identified by the groups) including one held virtually. Aided by the lifting of Covid-19 social distancing restrictions the team was able to speak with 200 individuals face-to-face, with over 90 survey responses completed. Further information on the process and outcomes of this engagement is set out in **Appendix 5** of this Consultation Statement.
- 4.5.5. The additional engagement with seldom heard groups was successful in reaching a broader representation of the community. Of those people who engaged in the consultation:
- Ethnic diversity - 58% of consultees were from a Black Caribbean, Black African, mixed or multiple ethnic background or any other White background.
 - People with disabilities - 19% of consultees considered themselves to have a disability, with 38% of these describing it as cognitive or learning disability or difficulty.
 - LGBTQ+ voices - Almost 15% of respondents identified as LGBTQ+.
 - A younger response - 65% of the consultees were under 40s, with 30% under 29 years old, including those under 18, and 35% within 30 and 39 years old.
- 4.5.6. Feedback from this engagement echoed many of the key themes conveyed by respondents to the Regulation 18 consultation, particularly local residents and community groups. For example, respondents reflected on the need for more genuinely affordable housing, the importance of high quality living environments (including fit-for-purpose housing along with access to parks and open spaces) and issues around public transport access and frequency of services. The engagement also helped to draw attention to key areas of interest and/or concern amongst the respondents. These included community cohesion, security and perceptions of safety, and design of the built environment especially the public realm.

4.5.7. Whilst it cannot be considered as part of the statutory consultation process of the Local Plan, officers are acutely aware of the importance of the feedback from the Voices of Lewisham work undertaken by the Council during the COVID-19 Pandemic. A key thread from this work was economic recovery, the creation and investment in new local jobs, community space and housing. Officers have reviewed this work to inform the Local Plan.

4.6 Consultation responses

4.6.1. The Regulation 18 consultation process had substantial engagement from residents, community groups, business, and stakeholders. Feedback was received from over 1,400 respondents with several thousand comments in total. This represents a successful local plan response rate when compared to other London borough's local plan consultations both prior to and during the Covid-19 pandemic. The consultation responses included:

Commonplace main site

- Visitors 13,001
- Respondents 937
- Agreements with comments 2,307

Commonplace interactive map

- Visitors 1,870
- Comments 577
- Agreements on specific comments 2,061

Local Plan inbox – written representation

- Respondents 450

Online “town hall” events

- Total attendance 492

5 Main issues raised and how consultation feedback was considered

5.1 Background

5.1.1. This section provides a summary of the main issues raised during the Regulation 18 consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document and supporting materials. It also sets out

how council officer considered these responses. The section helps to illustrate how feedback was used to inform the preparation of the plan.

- 5.1.2. The main issues raised through the consultation are set out in the tables below. These are organised around each of the main parts and sections of the draft Local Plan. The tables focus on policy areas or matters where there were significant concerns or issues raised with the scope of the draft Local Plan and its preferred policy approaches. The tables are not intended to cover areas where there was general agreement or support.
- 5.1.3. The tables in Section 5 of this Consultation Statement do not capture all of the issues raised or changes made in response to representations. For example, feedback and responses on specific site allocation proposals are not included in the tables. Full details of the representations and officer responses are set out in Appendices 2, 3 and 4 of this Consultation Statement.

Representations not recorded

- 5.1.4. In a very limited number of cases there were representations submitted that included discriminatory language or inflammatory statements about council officers, the council and other government bodies. Such language and statements are considered by the council to be unacceptable and representations have therefore been removed from the schedules. The representations have been filed for council records should they be required in the future, for example, at the request of the Planning Inspector.

Respondent details

- 5.1.5. The personal details of individuals making representations have been redacted where necessary in response to the General Data Protection Regulation (GDPR). Respondents will be assigned a unique reference number for the purpose of the consultation records. The council will endeavour to publish the names of community groups, special interest groups, government bodies and other organisations alongside the representations made.

5.2 General comments

Main Issues	Response / action(s)
Public consultation	
View that the public consultation was inadequate and not sufficiently advertised.	The council carried out the public consultation in accordance with its adopted Statement of Community Involvement. The consultation was advertised in a variety of ways including notices in local newspapers and Lewisham Life magazine, site notices, promotion on the council's website and social media accounts. The consultation ran from 15 th January to 11 th April 2021, a period which is well in excess of the statutory minimum 6-weeks.

<p>View that the public consultation should not have been carried out during Covid-19 as it limited opportunities for engagement.</p>	<p>The Government has set a deadline for all local authorities to have an up-to-date local plan in place by 2023. It is important that plan preparation is not unduly delayed. The Government has also introduced new legislation and guidance to ensure that local authorities can continue preparing plans effectively during the pandemic. Whilst recognising that the Government's social distancing guidelines introduced challenges, the consultation was a successful one both in terms of the number of responses received and the wide range of stakeholders submitting representations.</p>
<p>Local Plan format</p>	
<p>The draft Local Plan is too long and repetitive in parts.</p>	<p>The Local Plan will consolidate 4 documents into a single plan. To support the consultation, a short-format Summary Document was prepared. The plan has been professionally desktop published in a user-friendly format, with navigation aided by embedded links to different sections of the plan. Following the Regulation 18 consultation, the Local Plan has been comprehensively reviewed to make it shorter and more concise, for example, by removing repetition of policies or supporting text.</p>
<p>The draft Local Plan language is too vague (e.g. development proposals should..., or must seek to..., etc.) and could compromise the council's decision making powers.</p>	<p>The Local Plan has been amended to provide more authoritative language where appropriate (e.g. development proposals must..., will be required to..., etc.)</p>
<p>Implementation</p>	
<p>More needs to be done about planning enforcement.</p>	<p>Planning enforcement, whilst a function of Lewisham council's Planning Service, is outside the scope of the Local Plan.</p>
<p>Question as to whether the Local Plan (including its vision and objectives are realistic and deliverable) given the limited resources available to the council and public sector stakeholders, especially as a result of Covid-19.</p>	<p>The council is not solely responsible for delivering the Local Plan. A wide range of public and private sector stakeholders will support the implementation of the plan, both through the delivery of new development and directing investment, for example, to provide new and improved infrastructure and services.</p>

5.3 Part One: Planning for an Open Lewisham

Main Issues	Response / action(s)
Vision and objectives	
The vision is too vague.	The vision is an overarching statement about the type of place Lewisham is and should become in the future. It provides a direction for the Local Plan, which the objectives and policies help give effect to. The council considers the vision is proportionate given the wide range of policy topic matters covered by the plan.
Suggestions for new strategic objectives to be included.	The draft Local Plan strategic objectives were set and agreed by elected Members through All Member workshops. Requests for modifications to the objectives have been considered and additions have been made in response. For example, a new objective around support for green industries in supporting the transition to a low carbon, circular economy.
Spatial strategy	
Question as to whether the growth assumptions underpinning the plan are valid, recognising it was largely prepared prior to peak of Covid-19.	Following the Regulation 18 consultation, additional evidence base documents have been prepared and used to inform the next stages of plan preparation. This evidence includes updated population projections, a new town centre study and Strategic Housing Market Assessment.
View that Lewisham should not be accommodating additional growth and development, especially the levels set out in the plan.	The NPPF requires the council to plan positively to meet objectively assessed needs. Evidence base studies have been commissioned and prepared to identify needs such as for housing, business space, open space and infrastructure. The London Plan also sets a housing target for Lewisham that the Local Plan must deliver.
Clarity sought on what happens if the Bakerloo line extension is delayed or is not delivered within the plan period.	The Local Plan has been amended to make clear that the spatial strategy is not dependent on the BLE. However, the plan will continue to make provisions to secure the BLE and not preclude its future delivery, as well as to maximise development opportunities associated with the BLE.

5.4 Part Two: Managing Development

Main Issues	Response / action(s)
High quality design	
Concerns about the impact	The Local Plan has been informed by the Lewisham

<p>of development in terms of harm to or loss of local character.</p>	<p>Characterisation Study. The draft plan makes clear that all new development must respond positively to local character by following the design-led approach. The plan has been amended to provide clarifications around the need for proposals to address the character of a site and its wider context. The Local Plan is a strategic document and site specific considerations for local character will invariably be considered through the development management process.</p>
<p>The plan does not adequately recognise that character of an area can evolve over time, as set out in the London Plan.</p>	<p>The Local Plan has been amended to reflect that development proposals should respond positively to local character, recognising that the character of some localities may evolve over time in line with the spatial strategy.</p>
<p>The plan needs stronger policies to ensure healthy living environments.</p>	<p>The Local Plan has been amended to include a new policy on Health Impact Assessments, which will be required for certain types of development proposals, including major developments. The policies on amenity have also been reviewed and strengthened, with links to good practice guidance, such as that prepared by Sport England.</p>
<p>Concerns about approach to building heights. Opposition to tower blocks along with requests for the plan to set limits on heights. Many comments focussed on specific locations, such as Lewisham and Leigate town centres. View that Local Plan must provide further details about areas which are suitable for tall buildings and acceptable building heights.</p>	<p>The London Plan makes clear that tall buildings will play a part addressing housing needs across London. It directs Local Plans to identify locations that may be suitable for tall buildings and to set parameters for building heights. Following the Regulation 18 consultation, a Tall Buildings Study Addendum was prepared and issued for public consultation. The Local Plan buildings heights policy has been amended taking into account the study findings.</p>
<p>Concerns about the loss of garden land.</p>	<p>The draft Local Plan clearly sets out that garden land will be protected from inappropriate development. However there are permitted development rights which enable residential extensions of a certain size. The policy on 'infill and backland sites, garden land and amenity areas' has been updated to include a reference to the council's adopted Small Sites SPD, which will support policy implementation.</p>
<p>Suggestion for additional local views to be</p>	<p>The Local Plan is considered to be in conformity with the London Plan's London View Management Framework. Local Views were reviewed through the</p>

designated.	preparation of the Lewisham Characterisation Study, which was subject to public consultation.
The plan needs to provide more detail around inclusive design.	The Local Plan has been amended to refer to the National Design Code along with additional requirements around tenure integration and tenure neutral design. A new requirement for proposals to submit an Inclusive Design Statement has also been included.
Heritage	
Concerns about the impact of development in terms of harm to or loss of heritage and heritage assets.	The Local Plan has been informed by the Lewisham Characterisation Study, Conservation Area Appraisals and other evidence base documents. The draft Local Plan is considered to be consistent with the NPPF policies on heritage and conservation. Policies have been amended to provide more authoritative language to help ensure developments preserve and enhance the significance of heritage assets and their setting. In addition, following the Regulation 18 consultation a Heritage Assessment has been undertaken on selected major development sites (Deptford and New Cross areas) and findings have been used to inform changes to relevant site allocation policies.
Requests for additional Areas of Special Local Character to be designated or recognised.	Areas of Special Local Character (ASLC) are non-designated heritage assets. The Local Plan included policies dealing with non-designated heritage assets. The plan been amended to make clear how future ASLC will be identified, and which ASLC are currently recognised.
Concerns about the de-designation of the Sydenham Hill Ridge Area of Special Character.	The draft Local Plan proposed to de-designate the Sydenham Hill Ridge as an Area of Special Character and to instead recognise it as an Area of Special Local Character (non-designated heritage asset). It is considered that this recognition in combination with other policies, such as view management, will ensure protection for the distinctive character of this area. The Local Plan Schedules have been amended to make clear the Ridge is recognised an ASLC.
It is inappropriate to include a policy on enabling development, as enabling development is by definition contrary to the development plan.	The standalone policy on enabling development has been deleted from the Local Plan. However a policy criterion has been retained to ensure clarity for the public about how relevant proposals will be considered, with links to Historic England guidance.
Housing	

<p>Housing target - references to the Local Housing Need (LHN) figure should be removed.</p>	<p>Following the Regulation 18 consultation, the London Plan has come into force. This provides an up-to-date housing target for Lewisham. The Local Plan has been amended to remove references to the Government's LHN figure and makes clear the London Plan housing target for Lewisham is the strategic housing requirement.</p>
<p>General support for affordable housing policies and 50% target. However doubts that new housing will be affordable to local people – monitoring shows current 50% target not being met.</p>	<p>The draft Local Plan set out a strategic target for 50% of all new homes to be genuinely affordable housing, with the measure of affordability being linked to local income levels. Following the Regulation 18 consultation an update to the Local Plan Viability Assessment has been undertaken, which demonstrates that the approach is viable. It is noted that the London Plan includes a Viability Tested Route to affordable housing, where a 35% threshold is sufficient to satisfy the policy requirements.</p>
<p>Development viability approach, particularly for affordable housing, should be amended.</p>	<p>In terms of development viability, the draft Local Plan has been amended to refer to the 'Existing Use Value Premium' approach as a benchmark for establishing the existing use value of land, in line with regional and national planning policy.</p>
<p>View that more family homes are needed not 1 and 2 bedroom flats.</p>	<p>The draft Local Plan seeks to make provision for family homes. The plan states that development proposals must make provision for an appropriate mix of housing types. It also includes policies to prevent the loss of family homes through residential conversions. The Local Plan has been amended to include a target housing size mix for affordable housing, which will clarify expectations for the delivery of affordable family units on new developments.</p>
<p>Local plan must set a 10-year target for gypsy and traveller accommodation as per London Plan. Some opposition to proposed new gypsy and traveller site at Poole Court.</p>	<p>The Local Plan has been amended to include a 10-year housing target for gypsy and traveller accommodation, informed by local evidence. The council must plan positively to meet local housing needs. It has undertaken assessments of sites through previous work on the Gypsy and Traveller Site Local Plan (which has now been redacted in accordance with the Local Development Scheme), and the preferred site is included in the Local Plan.</p>
<p>The Local Plan is silent on Build to Rent products.</p>	<p>The Local Plan has been amended to include a new policy on Build to Rent.</p>
<p>Concerns about overconcentration of Houses in Multiple</p>	<p>The draft Local Plan included a policy to address the harmful overconcentration of HMOs. The policy has been amended to provide criteria against which</p>

Occupation (HMO).	overconcentration will be assessed, which will aid policy implementation. The council is currently reviewing HMO accommodation and may in the future extend the area of the Article 4 Direction which removes Permitted Development rights for HMOs, however the making of such Directions is outside the scope of the Local Plan.
Economy and culture	
The Local Plan needs to respond to new planning legislation, including changes to the Use Classes Order.	The Local Plan section on economy and culture has been comprehensively reviewed to reflect and respond to changes in planning legislation, including the amended Use Classes Order.
The Local Plan does not reflect Lewisham's role for London's Central Activity Zone (CAZ). This includes the need to support distribution and related logistics land uses, including warehousing.	The Local Plan has been amended to provide support and clearer direction around appropriate locations for warehousing, distribution and logistics. This is in the context of the borough's identified main need for land and space for light industrial uses.
Further clarification required on approach to managing Strategic Industrial Land.	The Local Plan has been amended to provide further details on the approach to the re-configuration of Surrey Canal Road SIL to enable the co-location of employment and other uses
Request for specific land or sites to be identified as suitable for co-location of industrial and other uses.	Where industrial sites have been allocated in the Local Plan for co-location of employment and other uses, these have been based on recommendations set out in the employment land study.
Clarification around industrial capacity and how this is defined.	The Local Plan has been amended to set a clear definition of industrial capacity, in line with the London Plan. This includes the removal of the 'benchmark plot ratio' proposed to calculate capacity.
Question as to whether affordable workspace policies are viable and deliverable.	The requirements for affordable workspace have been reviewed and tested through the Local Plan viability assessment, and updated where appropriate. The Local Plan has also been amended to provide more clarity around where and how affordable workspace will be secured.
Questions about the robustness of retail floorspace needs figures, given impact of Covid-19 and Brexit and acceleration of online shopping.	Following the Regulation 18 consultation, a Town Centre Trends report was prepared which included an updated retail needs assessment and revised floorspace needs. The Local Plan has been amended informed by findings of the report.

<p>Cultural quarters and night-time economy hubs broadly supported however some concerns about impact on local amenity, particularly in the evening and night-time.</p>	<p>The Local Plan includes policies on amenity which will ensure developments and uses do not have an unreasonable adverse impact on local amenity.</p>
<p>Some objections to approach to manage overconcentration of hot food takeaways.</p>	<p>The Local Plan approach to managing hot food takeaways is considered to be in conformity with the London Plan.</p>
<p>Community infrastructure</p>	
<p>Question as to whether sufficient provision is made for community infrastructure required to support growth</p>	<p>The Local Plan has been informed by the Infrastructure Delivery Plan (IDP). The IDP has been prepared in collaboration with service providers and delivery partners. Following the Regulation 18 consultation, the IDP was updated to take account of the Greater London Authority's latest population projections, and the council engaged with stakeholders to review and update the IDP in light of this information. The Local Plan includes development management policies and site allocation requirements to ensure that new developments contribute to and/or are appropriately supported by community infrastructure.</p>
<p>Policies to deal with proposals involving loss of sports facilities and land are not in accordance with the London Plan</p>	<p>The Local Plan has been amended with new policies on sports and recreation to ensure conformity with higher level policies.</p>
<p>Green infrastructure</p>	
<p>View that stronger protections are needed for open space. Clarifications required to distinguish between open and green spaces and the level of protection given to each.</p>	<p>Following the Regulation 18 consultation additional studies have been prepared on green infrastructure. They include the Open Spaces Review, MOL Review Update and SINC Surveys. Informed by this evidence, the Local Plan has been amended to set out a hierarchy of open spaces with policies to protect open space commensurate with their place in the hierarchy. This includes a clear distinction between green and open spaces.</p>
<p>Requests for open spaces and nature sites to be designated or de-designated.</p>	<p>Following the Regulation 18 consultation additional studies have been prepared on green infrastructure. They include the Open Spaces Review, MOL Review Update and SINC Surveys. This evidence has informed the setting of land use designations, which will be reflected on the Policies Map. This includes changes made to the Regulation 18 draft</p>

	Local Plan.
The plan does not adequately respond to the Environment Act 2021 especially provisions around Biodiversity Net Gain.	The Local Plan has been amended in response to the Environment Act. This includes policies which set the strategic framework for Local Nature Recovery Networks and more detailed requirements for development proposals to deliver Biodiversity Net Gain.
Request for geodiversity sites to be designated.	The Local Plan has been amended to designate additional geodiversity sites, informed by evidence prepared by the London Mayor and London Geodiversity Partnership.
Sustainable design and infrastructure	
View that Local Plan does not go far enough in responding to climate emergency, including design standards for reducing carbon emissions.	The draft Local Plan policies set out approaches to carbon management and achieving net carbon neutrality, which align with the London Plan. Where more stringent requirements are set locally it must be demonstrated that these will not adversely impact on development viability. The Local Plan Viability Assessment sets out that the approach to carbon management is appropriate and will enable other elements of the plan to be deliverable, such as requirements on affordable housing. In response to feedback, the Local Plan has been amended to include additional policies have been on non-regulated carbon emissions (i.e. those not captured within Building Regulations / embodied carbon).
Differing views on sustainable retrofitting. Some suggest the policies are too onerous and do not provide sufficient consideration of feasibility. Others consider that more detail should be included on this design aspect.	The Local Plan has been amended to provide further details on retrofitting of the existing building stock. Where policies require that certain design ratings are satisfied (e.g. BREEAM), flexibility has been introduced to allow consideration of feasibility on a case-by-case basis. The policy approaches have been tested through the Local Plan Viability Assessment.
View that air quality policies should be strengthened.	The Local Plan has been amended to strengthen policies on air quality, with a requirement that all development proposals must be at least air quality neutral. The plan has also been updated to take account of and better align with the council's latest Air Quality Management Plan.
Opportunities should be taken to strengthen water and flood risk management policies. This includes clearer links to wider sub-regional key plans and	The water management section has been comprehensively reviewed and updated, particularly in response to feedback provided by statutory consultees such as Environment Agency, Thames Water and Port of London Authority.

strategies.	
Clarification is required on approaches to safeguarding waste sites.	The draft Local Plan identified strategic waste sites to be safeguarded in order to meet the borough's London Plan waste apportionment. It is acknowledged there are other waste sites with licenced capacity (i.e. with Environment Agency permits). The Local Plan has been amended to make clear the protection afforded to all such sites, in line with the London Plan.
Transport and connectivity	
Clarification required around the approach to safeguarding land for the Bakerloo line extension.	The Local Plan has been amended to make clear the formal Safeguarding Directions for the BLE issued by the Secretary of State. Clarifications have also been provided around approaches to ensuring development does not prejudice the delivery of the BLE, particularly around Phase 2 where Directions have not been set.
The plan does not adequately respond to the fact that parts of the Borough are poorly served by public transport, and some people rely on cars for access.	The Local Plan helps give effect to the London Mayor's objective for 90% of journeys in inner-London to be made by walking, cycling or public transport. It sets out strategic priorities for securing new and improved transport infrastructure to address local needs. Where development proposals come forward, the policies seek to ensure that the nature, scale and density of development responds to public transport access, and where necessary, is appropriately phased or makes provision for transport improvements.
Varied views on Low Traffic Neighbourhoods.	The Low Traffic Neighbourhoods (LTN) is a scheme that Lewisham and other London councils are piloting to support liveable, healthier neighbourhoods by encouraging modal shift and reducing car use. Whilst the Local Plan sets out similar objectives, the LTN scheme itself is outside the scope of the Local Plan, and its future will be considered independently of the plan-process by council's Transport service.
General support for Healthy Streets Approach but more details needed to support walking and cycling.	The Local Plan includes new policies on public realm and the Lewisham Links, which will support the delivery of a network of high quality cycleways and walking routes. The Local Plan has been amended to ensure development proposals comply with the London Cycle Design standards, and to provide clarifications on site allocations for strategic cycleways.
Approaches to car parking are not in conformity with	The Local Plan parking policies have been comprehensively reviewed and updated to ensure

the London Plan.	conformity with the London Plan, including on car-free and car-lite development.
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5.5 Part Three: Lewisham's neighbourhoods and places

Main Issues	Response / action(s)
General	
Disagreement over boundaries of neighbourhood areas included in Part 3 of the Local Plan.	The draft Local Plan establishes five neighbourhood character areas as a means to provide a neighbourhood level focus for managing development and directing investment in the Borough. The sub-areas were informed by the Lewisham Characterisation Study which was prepared by the council working with community groups. Whilst acknowledging that there may be disagreements over the geography of these areas, the Local Plan must be read as a whole and it is considered that the sub-area policies will be beneficial in supporting the delivery of the spatial strategy for the borough.
A significant number of responses dealing with matters such as local and historic character development density, building heights, open and green spaces, nature sites, transport and connectivity.	Many of the matters raised concern local issues which have been addressed through changes to the borough-wide policies, including the Part 2 Managing Development section of the Local Plan. The table under subheading 5.5 should therefore be referred.
Site allocations. A significant number of responses dealing with indicative site development capacities, development principles and guidelines for specific sites.	The site allocations have been reviewed and amended where considered necessary. This includes the removal of or changes to site boundaries, amendments to indicative capacities, development requirements and guidelines for specific sites. As part of the review, officers have updated the Site Allocations Background Paper, which includes a methodology for setting the indicative site development capacities. Full details of representations and officer responses are set out in an Appendix to the Consultation Statement, which should be referred for further information.
Site allocations. Call for sites submissions.	The council invited to the public to submit additional sites for consideration as part of the Regulation 18 consultation. However it has been decided that additional sites will not be considered for inclusion as site allocations. This is because the public would not have an opportunity to appropriately comment

	<p>on the proposals for those sites at the Regulation 19 stage. Also, that the council considers that the existing site portfolio is sufficient to meet identified needs, including for housing and business space. The site submissions will be considered in any subsequent Local Plan review, which the NPPF requires to be undertaken every 5 years.</p>
<p>Lewisham's Central Area (excluding site allocations)</p>	
<p>Varied perspectives between local communities and landowners/developers on development opportunities, scale and level of growth planned within and around Lewisham and Catford major centres.</p>	<p>Lewisham and Catford are the borough's principal town centres, which are located within a London Plan Opportunity Area, and are therefore considered appropriate locations for directing growth and investment, consistent with the spatial strategy. The Lewisham Town Centre Local Plan, which will be reviewed and replaced by the new Local Plan, has set a strategic framework for the centre and a significant amount of development has been consented and delivered in accordance with it. The Catford Town Centre Framework, which has been prepared through extensive consultation with the community, is an evidence base document which has informed the Local Plan. Site allocations have been updated and prepared to ensure clarity over development within the centres.</p>
<p>View that the plan does not adequately address Hither Green, particularly the area west of the railway.</p>	<p>The Local Plan has been amended to address this area in greater detail. This includes a new spatial objective and the designation of Hither Green Lane as a new Local Centre.</p>
<p>North area (excluding site allocations)</p>	
<p>Request for a 'community-led' masterplan to guide development and regeneration in the area.</p>	<p>The Local Plan sets the strategic development framework for managing growth and regeneration in the area. This includes site allocation policies for major development sites, many of which have now gained planning consent and development parameters have therefore been established. The Local Plan makes clear that development proposals must be delivered through a master-plan process, which must be prepared through consultation with local communities. The council has prepared a New Cross Area Framework through consultation with the local community and this has helped to inform the Local Plan, and will support its implementation.</p>
<p>Local Plan should do more to address polluting industry and lorry movements in area.</p>	<p>This part of the Borough contains designated Strategic Industrial Locations and waste management sites which the London Plan directs the Local Plan to safeguard for commercial and industrial uses. The Local Plan includes new</p>

	<p>policies on Deliveries, Servicing and Construction and Amenity to help manage impacts arising from activities associated with these uses.</p>
<p>Request that SELCHP (waste management facility) is redeveloped for alternative uses owing to pollution and inappropriate use in residential area.</p>	<p>The London Plan sets the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London's waste should be managed within London by 2026). It directs the Local Plan to safeguard waste sites/facilities in order to meet the borough's apportioned tonnage of waste. The loss of a site is only permitted where a suitable alternative site can be found elsewhere in London. SELCHP plays an important role in helping to meet the London Plan waste apportionment figure. In the absence of an identified alternative site for this use, the Local Plan must continue to safeguard the land and facility for waste management uses, for the time being. However the Local Plan has been amended to include a new policy which seeks to improve the environmental performance of existing waste management facilities.</p>
<p>Concerns over amount of and access to green space in area planned to accommodate significant amount of growth</p>	<p>The Local Plan site allocations for the North area make provision for significant new publicly accessible open space to be delivered, including at Surrey Canal Triangle and Convoys Wharf. This includes new riverside spaces linking to the Thames Path and Surrey Canal Linear Walk and other components of the Lewisham Links network of cycleways and walking routes.</p>
<p>East area (excluding site allocations)</p>	
<p>Varied perspectives between local communities and landowners/developers on development opportunities, scale and level of growth planned within and around Lee Green district centre. This includes building heights and tall buildings.</p>	<p>Lee Green is a district centre and identified in the spatial strategy as a Growth Node. It is therefore considered an appropriate location for directing new development, growth and investment. This is particularly to enable and support the revitalisation of the town centre. Site allocations have been updated and prepared to ensure clarity over development within the centre. In addition, the Local Plan has been amended to provide more clarity on matters such as density and building heights, including for tall buildings informed by the Tall Buildings Study Addendum.</p>
<p>The Local Plan needs greater recognition and support for the network of Green Infrastructure, including the Railway Children Urban National</p>	<p>The draft Local Plan includes policies dealing with the distinctive 'linear network of green infrastructure' in the East area. Following the Regulation 18 consultation additional studies have been prepared on green infrastructure They include the Open Spaces Review, MOL Review Update and SINC</p>

Park.	Surveys. Informed by this evidence, the Local Plan has been amended to set out a hierarchy of open spaces with policies to protect open space commensurate with their place in the hierarchy. The draft Local Plan vision for the East Area included an aim for Urban National Park. However the Local Plan has been amended to make reference to the aspiration for a District Park in the east area which reflects the Railway Children heritage. The Infrastructure Delivery Plan has also been updated to include this District Park in the priority list of projects.
Concerns about designation of Blackheath Village as night-time economy hub., particularly in terms of impact on local character and amenity.	The recognition of Blackheath district centre as a night-time economy hub of 'more than local significance' is established by the London Plan. This is given effect through the Local Plan by way of a designation and the main intention is to support the centre's long-term vitality and viability by building on its unique attributes. All development proposals will need to demonstrate that they will respond positively to local and historic character and not result in an unreasonable adverse impact on local amenity.
South area (excluding site allocations)	
General support for regeneration at Bell Green and Lower Sydenham, including redevelopment of retail parks. Request for a 'community-led' masterplan to guide this process. Concerns about loss of local jobs by redevelopment of Sainsbury's and other retailers.	The London Plan directs that boroughs should consider opportunities to enable the redevelopment of out-of-centre retail parks for a wider range of uses, including housing. The Local Plan makes provision for the reconfiguration and redevelopment of the retail park(s) for a new mixed-used neighbourhood. This will support a future town centre, which will continue to make provision for businesses and jobs. The Local Plan sets the strategic development framework for this, including site allocations. It also makes clear that development proposals must be delivered through a master-plan process, which must be prepared through consultation with local communities. The Local Plan has been amended to clarify that a local centre is appropriate for Bell Green through its redevelopment, informed by a new Retail Impact Assessment study.
The Local Plan lacks detail about Downham and the future objectives for this area.	Downham forms part of the Strategic Area for Regeneration identified in the draft Local Plan. The plan includes policies to direct new investment within this area including Downham district centre. The area comprises largely of established residential neighbourhoods. Owing to its distinctive

	cottage estate character there are limited major or large site redevelopment opportunities and therefore few site allocations in Downham.
The Local Plan lacks detail about Perry Hill and Perry Vale and the future objectives for this area.	The Perry Hill and Perry Vale area comprise largely of established residential neighbourhoods where sensitive intensification will be supported to deliver new homes and other area improvements. For clarity, the Local Plan has been amended with additional key spatial objectives for this part of the sub-area.
Reassurances required about protection of Livesey Memorial Hall and Gardens.	The draft Local Plan policies make clear that heritage assets must be conserved and enhanced. The Local Plan has been updated to bring the Livesey Memorial Hall and Gardens within the site allocation for the former Bell Green Gasholders. This will ensure that any future development proposals for the gasholders site address the Livesey Memorial Hall and Gardens as well as its wider setting through the masterplan process.
More needs to be done to improve walking and cycling environment, such as car dominance at Southend Land, the gyratory, etc.	The draft Local Plan provides the spatial planning framework for investment in transport within this area. The key spatial objectives for the sub-area make clear that the Healthy Streets Approach will be used to enable and enhance movement by walking and cycling. Specific measures will be considered on a case-by-case basis, having regard also to the council's Local Implementation Plan (LIP). In addition, the long-term objective is for the BLE Phase 2 to be delivered within the area, which will enable transformational improvements in public transport.
West area (excluding site allocations)	
General support for revitalisation of Forest Hill district centre. Request for a 'community-led' masterplan to guide this process.	The Local Plan sets the strategic development framework for managing growth and revitalisation of the area. This includes site allocation policies for major development sites and the area around the station approach. The Local Plan makes clear that development proposals must be delivered through a master-plan process, which must be prepared through consultation with local communities. Officers have considered the proposals included in a previously prepared community-led masterplan and efforts have been made to reflect this in the Local Plan. However, there are some limitations around the feasibility of some aspects of the community masterplan, such as works to Transport for London Roads (e.g. South Circular) and other parts of the public realm, and these have not

	therefore been included in the plan.
Concerns and objections raised about proposals for employment land at Willow Way and at Upper Kirkdale local centre.	Following the Regulation 18 consultation the council has held landowner meetings. Informed by these discussions the site allocation for the Willow Way employment site has been amended to provide more certainty over the masterplan process and outcomes sought. This includes protections for the MOT centre and the amenity of the neighbouring public house.
The Local Plan lacks detail about Ladywell the future objectives for this area.	The Ladywell area comprises largely of an established residential neighbourhood where sensitive intensification will be supported to deliver new homes and other area improvements. Owing to its distinctive historic character there are limited major or large site redevelopment opportunities and therefore few site allocations in Ladywell.
View that the area around Drakefell and Gellatly Roads is overlooked and that more details are required given this is a prominent movement corridor.	The Local Plan has been amended to provide further details for this area, particularly in terms of supporting the Healthy Streets Approach along the corridor.

5.6 Part Four: Delivery and monitoring

Main Issues	Response / action(s)
Delivery	
Suggestion that the Planning Obligations guidance should be reviewed and updated in tandem with the Local Plan.	The council will prepare a future update to the SPD. The Local Plan Viability Assessment has informed the setting of any formulaic approaches to calculating contributions, so to ensure these have been viability tested.
Monitoring	
Monitoring framework is limited and should be expanded.	The monitoring framework is considered proportionate to the Local Plan and focuses on the key objectives set out in Part 1. The council's key plans and strategies also include monitoring frameworks to support their delivery. However it is acknowledged that the framework could benefit from additional indicators and it has therefore been supplemented.

5.7 Part Five: Appendices and schedules

Main Issues	Response / action(s)
Schedules	
Comments regarding land-use designations and requests for changes to these. This is particularly in respect to designations for open spaces, nature sites and town centres.	Following the Regulation 18 consultation the council has undertaken additional evidence base studies. Informed by these studies the Local Plan has been amended with changes to some designations set out in the Regulation 18 draft Local Plan. The majority of the changes relate to the section on green infrastructure.

5.8 Supporting documents and materials

Main Issues	Response / action(s)
Integrated Impact Assessment (IIA) / Habitats Regulations Assessment	
Comments on the scope of the Sustainability Appraisal Framework and assessments included in the Interim IIA Report.	Representations on the interim IIA and HRA Reports have been considered and used to inform the Final IIA Reports.
Recommendations for improving or strengthening the Local Plan policies, such as for approaches to river restoration and biodiversity.	The Local Plan policies on Green Infrastructure and Sustainable Design and Infrastructure have been reviewed and amended, taking into account this feedback.
Infrastructure Delivery Plan	
The population projections included in the IDP are out of date and do not adequately account for the impacts of Covid-19 and Brexit.	Population projections included in the draft IDP have been reviewed and updated, taking into account the latest borough-level population forecasts prepared by the Greater London Authority. The IDP has been re-circulated to internal and external stakeholders for their consideration, and updated where appropriate.
New information provided on infrastructure needs and projects, delivery timescales and funding gaps.	The draft IDP has been updated with the latest available information.

6 APPENDICES

Appendix 1 Regulation 18 draft Local Plan Consultation Publicity

Emails and letters

Press notices

Example site notice

Lewisham Life

Council webpage notices

Citizen Space consultation hub

Commonplace consultation hub

Social media notifications

Call for Sites form(s)

Press: NewsShopper articles

Appendix 2 Regulation 18 Draft Local Plan Written Responses

Appendix 3 Regulation 18 Draft Local Plan Commonplace Responses

Appendix 4 Regulation 18 Commonplace Interactive Map Responses

Appendix 5 Post Regulation 18 Seldom Heard Groups Engagement Report