

Lewisham Housing Delivery Test: Action Plan 2021

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1. Background

Local authorities are required to prepare a Housing Delivery Test (HDT) Action Plan where they have delivered below 95% of their housing requirement in the preceding three years. This Action Plan has been prepared in response to Lewisham scoring 88% in the latest HDT.

This Action Plan:

- Provides an overview of what the HDT is, explains Lewisham's latest HDT result and recaps guidance for preparing action plans – see section 1.
- Provides an understanding of local housing delivery in Lewisham – see section 2.
- Considers reasons for under-delivery – see section 3.
- Explores how the Council is seeking to minimise the risk of under-delivery and identifies key actions to boost housing delivery – see section 4 and Appendix 1.
- Sets out project management and monitoring arrangements – see section 5.

1.1 What is the Housing Delivery Test?

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

Table 1: HDT Consequences

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

1.2 Lewisham's HDT Result

Table 2 shows Lewisham's latest result from the 2020 HDT, published by Government in January 2021. It measured Lewisham's housing completions during 2017-18 to 2019-20 and assessed it against Lewisham's annual housing requirement of 1,385 units per year, as set out in the 2016 London Plan. The Government imposed a lower requirement of 1,271 units for 2019-20 in order to take account of Covid-19 and the disruption caused by the national lockdown in March 2020. This Action Plan has been prepared in response to Lewisham scoring 88% in the latest HDT.

Table 2: Lewisham's 2020 HDT result

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	HDT 2020 measurement
17-18	18-19	19-20		17-18	18-19	19-20		
1,385	1,385	1,271	4,041	567	1,700	1,284	3,550	88%

Lewisham is not alone and 10% of local authorities in England are now required to prepare action plans. A further 28% also have to apply a 20% buffer in their 5YHLS or have a presumption in favour of sustainable development imposed upon them.

It is also worthwhile noting that this is the first time Lewisham has scored below the 95% threshold, with scores of 101% in the 2019 HDT and 95% in the 2018 HDT. Looking back further based on a three year rolling average, Lewisham's delivery has been above the 95% threshold since before the Core Strategy was adopted in 2011.

1.3 Action Plan Guidance

This Action Plan has been prepared in line with national guidance. *Planning Practice Guidance: Housing Supply and Delivery* (July 2019) suggests that action plans should include an analysis of under-delivery and a range of actions that can help to boost delivery in the future.

PAS Guidance: HDT Preparing Effective Action Plans (June 2020) states that action plans should focus on effective measures to improve housing delivery within an area, be concise, easy to read and maintained as a live document. Furthermore, they should be used as a promotional tool, to raise awareness of the local authorities' actions to deliver housing in the borough and positively reinforce the strategy for growth set out in the Local Plan. The guidance promotes the use of existing sources of data and engaging with stakeholders in an appropriate manner, to identify the underlying causes of under-delivery. Action plans should identify tangible, implementable actions to boost delivery and establish how the key actions will be implemented (who is responsible for what and by when) and how it will be monitored over time.

2. Local Housing Delivery

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

2.1 Looking Backwards

Chart 1 shows the housing completions in Lewisham against the 2016 London Plan housing target of 1,385 per year, over the last three years. Note the Government reduced the 2019-20 target used in the HDT, to account for the Covid-19 lockdown. It demonstrates that completions fluctuate year by year, with 2017-18 experiencing a particular poor year in terms of delivery. However, completions in 2018-19 significantly exceeded the target, compensating for some of the shortfall in the previous year. The amount of homes delivered in 2019-20 match the number of homes required.

Chart 1: Completions 17-18 to 19-20

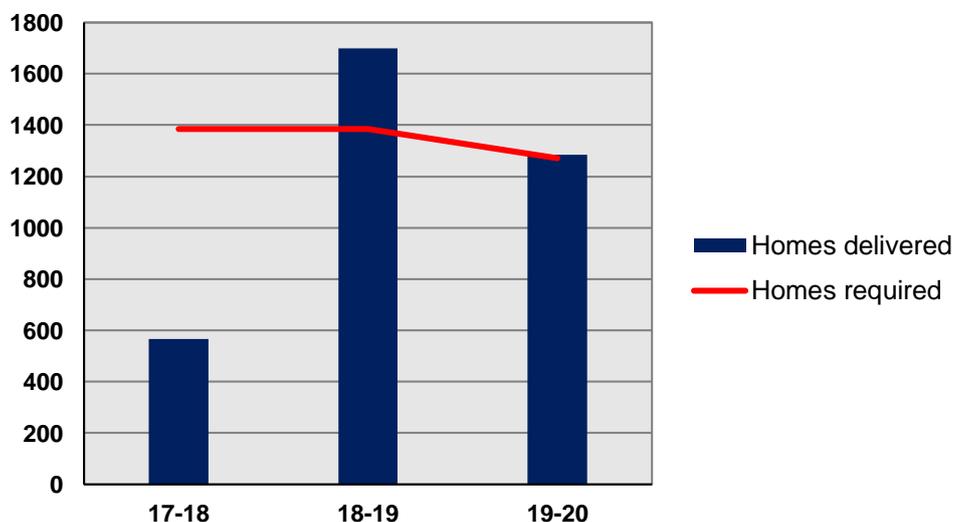


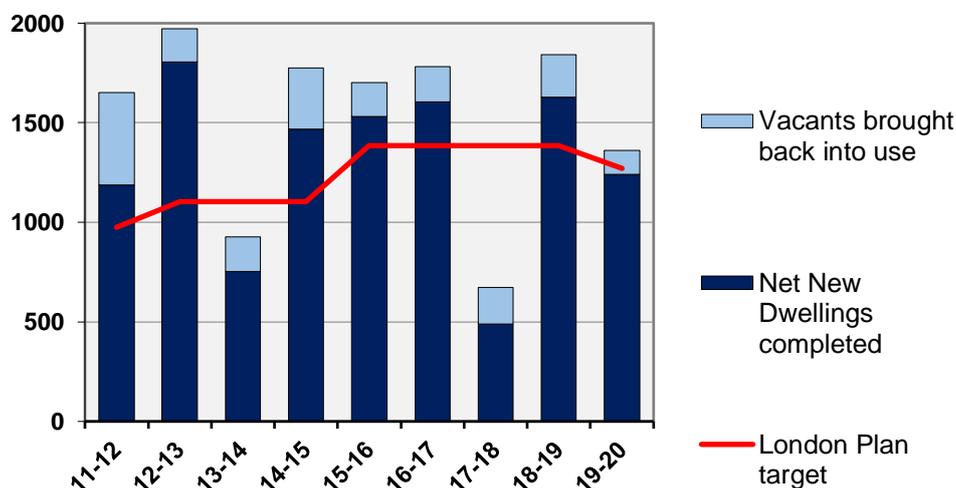
Table 3 shows that despite only reaching 88% in the latest HDT, 33 large sites experienced completions (above 10 net units) during the preceding three years. It demonstrates that past delivery has not been reliant on just a few sites and that a wide variety of sites have been delivered, including nine sites with more than 100 units.

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

2017-18	2018-19	2019-20
Kent Wharf (143)	Catford Greyhound Stadium (240)	Anthology, Deptford Foundry (316)
Marine Wharf West (140)	Heathside and Lethbridge (236)	Timberyard, Oxestalls Road (203)
29 Pomeroy Street (37)	Marine Wharf East (225)	Bond House, Goodwood Road (89)
Excalibur (20)	Lewisham Gateway (169)	19 Yeoman Street (72)
	Faircharm Trading Estate (148)	Rear of 15 Tyson Road (68)
	Boones Almshouses (58)	43-49 Pomeroy Street (65)
	St Clements Heights, Wells Park Road (50)	Rear of Chiddingstone House (53)
	68 Molesworth Street (44)	BMW, Lee Terrace (30)
	87-89 Loampit Vale (44)	St Mungos, Arlington Close (28)
	Astra House, Arklow Road (44)	Fairway House, 53 Dartmouth Road (27)
	65-71 Lewisham High Street (36)	Longfield Crescent Estate (27)
	23 Mercia Grove, Lewis Grove (31)	Former Pheobes Garden Centre (27)
	Downham Fire Station, Reigate Road (30)	16-22 Brownhill Road (19)
	167 Lewisham High Street (28)	
	Garages, 23 Boone Street, Dacre Park (25)	
	Adj. Forster House, Whitefoot Lane (21)	

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

Chart 2: Completions 2011-12 to 2019-20



It demonstrates a number of trends over time:

- The housing target (red line) has risen through different versions of the London Plan from 975 units per year in 2011-12 to 1,105 in 2012-13 to 1,385 in 2015-16. From now on, the target will be increased to 1,667 units per year, in line with Table 4.1 of the 2021 London Plan. Cumulatively, since 2011 the yearly targets amount to 11,101 units.
- The net housing completions (blue bars) have fluctuated since 2011, with a low in 2017-18 and a high in 2012-13. On average 1,300 units have been completed annually and 11,713 net units have been completed cumulatively since 2011.

- Note that the net completions for 2020-21 have not been included as the results of this year's housing completions survey are not yet available.
- By comparing the two sets of data, the cumulative net completions during 2011-12 to 2019-20 exceed the total housing requirement by 612 units.
- Overall, based on a three year average, Lewisham has been delivering above target since before the Core Strategy was adopted in 2011 and this shows that the 2020 HDT score of 88% does not reflect the usual good performance that Lewisham normally experiences.

2.2 Looking Forwards

A good supply of housing sites coming forward in the future can help to reduce the risk of under-delivery. Sites have only been included here where they comply with the NPPF Annex 2 definition of **deliverable** (i.e. available, in a suitable location and achievable, with a realistic prospect that they will be delivered within five years). Note that in 2020 the Secretary of State accepted that the NPPF definition of "deliverable" is not a closed list. Sites included within Lewisham's 5YHLS include:

Consented sites:

- Sites that have planning permission (until they lapse).
- Sites that have outline permission.
- Sites that have prior approval.
- Sites on the brownfield land register.

Likely sites that have started to progress through the planning system, where evidence shows that they are deliverable within five years:

- Sites that have a resolution to grant planning permission, subject to S106 agreements.
- Adopted site allocations or other sites that the Planning Service and/or Council is dealing with (submitted applications, advanced pre-applications or sites at design stage).
- Unimplemented adopted site allocations, moved forward into the emerging Local Plan.
- New draft allocations in the emerging Local Plan.

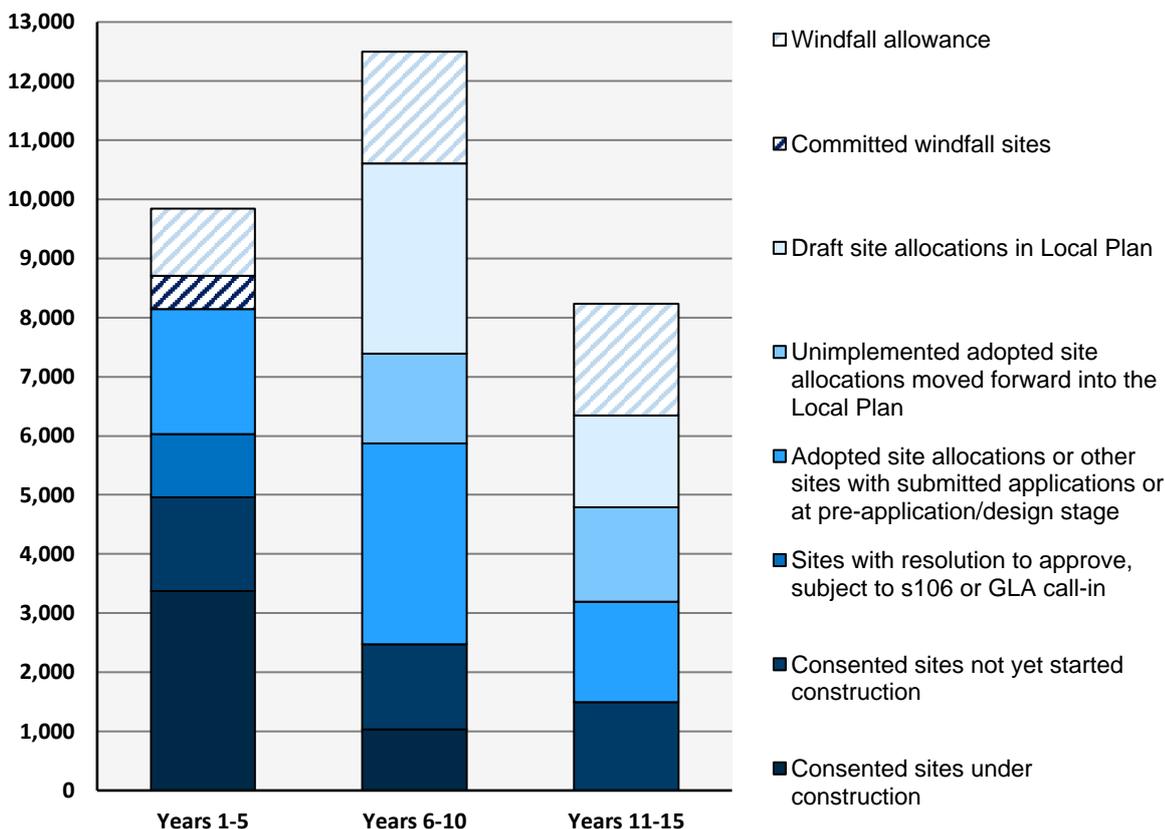
Table 4 shows the housing anticipated to be delivered in the first five years (2021-22 to 2025-26). It shows a strong supply, with a total of 9,847 units. 56% already have planning consent or have started construction and are therefore highly likely to be delivered. A further 32% have already started to progress through the planning system. Only the small windfall site allowance (12%) have not yet started to progress through the planning system and are at a higher risk of not being delivered in the first five years.

Table 4: Deliverable sites in next five years

Type of site	Number of sites	Number of homes to be delivered on site
Large consented sites under construction	16	3,377
Large consented sites not yet started construction	11	1,581
Small consented sites to be delivered in years 1 and 2	-	571
Large sites with resolution to approve, subject to s106 or GLA call-in	5	1,069
Large adopted site allocations and other sites with submitted applications or at pre-application/design stage	15	2,113
Small windfall sites allowance of 379 units per year for years 3, 4 and 5, in line with the small sites housing target in the 2021 London Plan	-	1,137
Total for all sites		9,847

Looking further into the future, Chart 3 shows an estimate of the deliverable supply that may be forthcoming over the next 15 years, although caution should be applied to these figures as they are subject to change. It shows a good supply of housing over 15 years, with 32% taking place in years 1-5, 41% in years 6-10 and 27% in years 11-15. It shows that there is a robust supply, as 31% already has planning consent or has started construction and a further 27% has already started to progress through the planning system and is therefore highly likely to be delivered. Site allocations (26%) and the small site windfall allowance (16%) may be more at risk of not being delivered. However, these sites are generally phased beyond the first five years, in order to allow time to gain planning consent.

Chart 3: An estimate of deliverable sites in next fifteen years



3. Reasons for Under-Delivery

This section considers if there are potential trends and factors impacting on local housing delivery. Overall, Lewisham has performed well in the past and has a healthy future supply of development sites but the number of new homes being completed in any one year fluctuates. A range of key actions can be put in place to ensure more consistent delivery in the future.

Data from the Brownfield Land Register has been used to determine whether sites are being delivered in a timely manner. Note that the following presents the situation as at December 2020 and sites may have progressed since then.

3.1 Lapsed Sites

Some consented sites have not been implemented. Table 5 (on the next page) shows consented sites that have lapsed since the start of the Brownfield Land Register in 2017. Note this represents a minimum number as sites containing less than five new homes are excluded from the register. Table 5 demonstrates that:

- The majority are small sites – the inference from this is that it is the smaller sites that are experiencing delays.
- All of the 22 lapsed sites are private developments – this makes it difficult to control as the Council has minimal powers to intervene in the development of private sites.
- A mix of developments were proposed – residential only developments do not fare better than mixed use developments, and vice versa.
- Cumulatively, these sites would have provided 431 new homes had they been built.

Table 5: Lapsed sites

Site name	Development proposed	Site ownership	Site size (hectares)	Number of homes that would have been delivered on site
17 Brandram Road	Residential	Private	0.03	6
302-308, 310-312 New Cross Road	Mixed use	Private	0.09	11
97 - 103 Florence Road	Residential	Private	0.09	9
Land adjoining 196 Brockley Road	Residential	Private	0.02	5
58-64 Brockley Rise	Residential	Private	0.05	5
Evelyn Court, Grinstead Road	Mixed use	Private	0.21	18
Rear of 197-199 Deptford High Street	Mixed use	Private	0.03	9
Featherstone Lodge, Eliot Bank	Residential	Private	0.63	33
1 Waldram Crescent	Residential	Private	0.03	8
39 Honor Oak Road	Residential	Private	0.09	6
Lewisham House, 25 Molesworth Street (Citibank)	Residential	Private	0.10	237
223-225 Lewisham High Street	Mixed use	Private	0.07	22
323 Lewisham High Street, Ravensbourne Arms	Residential	Private	0.04	7
232 Hither Green Lane	Mixed use	Private	0.03	6
Roof extension, 110-114 Deptford High Street	Residential	Private	0.10	5
2 Hatcham Park Mews	Residential	Private	0.04	8
Rear of 104 Deptford High Street	Mixed use	Private	0.02	6
8, 10 and 12 Perry Vale	Residential	Private	0.03	8
236-238 Stanstead Road	Residential	Private	0.03	5
169-171 Sydenham Road	Mixed use	Private	0.03	5
173-175 Waller Road	Residential	Private	0.05	7
Rear of 122 New Cross Road	Mixed use	Private	0.07	5
Total				431

3.2 Build Out on Consented Sites

Housing delivery is reliant upon the private sector to implement planning approvals, and bring forward phased schemes in a timely manner. There is little evidence of sites actually being stalled in Lewisham and there is a recognition that some sites, especially large, complex and phased schemes, can take a considerable time to be built out. Table 6 (on the next page) demonstrates that:

- Only three small scale private sites consisting of 16 homes received planning consent in 2017 but have not yet been implemented and are due to lapse during 2020-21.
- There are also 12 predominantly private sites, consisting of 319 new homes that received planning consent in 2017 or before, where they have started construction but have not yet been fully built out.
- An additional 32 sites (not shown in Table 6) were granted consent in 2018-19, of which 20 have not yet started construction.

Table 6: Build out on consented sites

Site name	Year site received planning consent	Development proposed	Site ownership	Site size (hectares)	Number of homes that would have been delivered on site
A) Sites consented four years ago, that have not yet started construction and are due to lapse in 2020/21					
1 Brockley Cross	2017	Residential	Private	0.02	5
1 Wearside Road	2017	Residential	Private	0.08	9
18 Clarendon Rise	2017	Residential	Private	0.04	2
Site name	Year site received planning consent	Development proposed	Site ownership	Site size (hectares)	Number of homes that would have been delivered on site
B) Sites consented at least four years ago, that have started construction					
Neptune Works, Grinstead Road	2012	Mixed	Private	1.14	199
465 New Cross Road	2013	Mixed	Private	0.04	9
35 Nightingale Grove	2014	Mixed	Private	0.02	8
Rear of 101-103 Springbank Road	2015	Residential	Private	0.09	6
Merchant Taylors Almshouses, Brandram Road	2016	Residential	Private	0.28	4
Sydenham Police Station, Dartmouth Road	2016	Residential	Private	0.20	33
94 Chinbrook Road	2016	Residential	Private	0.03	4
29 Ewelme Road	2016	Residential	Private	0.05	5
1 Myron Place	2016	Residential	Private	0.02	12
Woodstock Court, Burnt Ash Hill	2017	Residential	Private	0.36	8
Kenton Court, 132 Adamsrill Road	2017	Residential	Public	0.20	25
26 Marnock Road	2017	Residential	Public	0.19	6
Total					335

Table 7 lists the Strategic Site Allocations identified in the 2011 Core Strategy. Although they were granted outline planning consent as far back as 2012, it was always anticipated that these strategic scale developments would be delivered in the longer term (up to 2026 and beyond) and so they are **not** considered to be stalled. The Council has been working closely and proactively with landowners, developers and key stakeholders since 2011, to bring these Strategic Site Allocations forward for development in a timely manner. Table 7 details the progress made so far. See also section 4.1.1.

Table 7: Longer Term Delivery for Strategic Site Allocations

Site name	Progress made so far
Convoys Wharf	This is a phased site that was granted consent by the Mayor of London in 2014. Reserved matters for Phase 1 were granted consent in 2020, with 456 private units in plot 8 and 124 affordable units in plot 15 and a start expected in late 2021. Pre-application discussions are also ongoing and applications are expected imminently for 114 intermediate units in plot 12, 335 private units in plot 18 and 375 private units in plot 14. Across the whole Convoys Wharf site there will be 3,500 new homes.
Surrey Canal Triangle	This phased site was granted outline permission in 2012, and a S73 was granted in 2015. Development paused but pre-application discussions started again in 2018 and have been ongoing, a Supplementary Planning Document (SPD) has been prepared to guide future development and funding has been secured to deliver a new railway station. A new application from Renewal was validated in April 2021. It includes Renewal's land but

	excludes Millwall Football Stadium and its surrounding land. This is a hybrid application comprising 3,500 homes, of which 35% will be affordable housing, and a range of non-residential floorspace over 5 phases (600 in detail in Phase 1).
Timberyard, Oxestalls Road	This is a phased site with outline consent granted in 2016. It has already started construction and has completed the first plot of 203 new homes in 2020. Two reserved matters applications were consented in 2018-19 comprising up to 500 residential units including some potential student housing. Pre-application discussions for the remainder of the site are ongoing and new applications will be submitted in 2021.
Lewisham Gateway	This is a phased site, with outline consent granted in 2009. Phase 1 with 362 new homes was completed in 2017-18. Phase 2 was granted consent in 2019 comprising 530 units and 119 co-living units. Construction started on site in 2020 and it is anticipated to be completed in summer 2023.
Plough Way	This site is made up of different plots: Greenland Place, Marine Wharf West and Marine Wharf East, 1-17 and 19 Yeoman Street. It is now complete.

For some sites, it can take considerable time before homes start to be constructed on site. The reasons for this vary.

Sufficient S106 and CIL funds are needed to deliver infrastructure alongside site development, and can lead to delays when funding is not secured. Schemes can have a resolution to approve for a considerable amount of time before a S106 is agreed. Negotiating complex S106 agreements is time consuming, especially when agreeing to lower than target affordable housing on grounds of financial viability.

Conversely, the Planning Service has negotiated to bring forward affordable housing early in the delivery of the Convoys Wharf site and for an improved tenure mix that includes social rent. These were not part of the outline planning permission originally approved by the GLA and hence they took time to agree with the developer.

Whilst the delivery of housing is important, it also needs to be the right tenure to meet local housing needs. Negotiating the right S106 agreement for each site can be time consuming but will boost the delivery of a range of housing tenures, including affordable housing.

Pre-commencement conditions to deal with site constraints can front-load site costs and take time to implement and discharge, before new homes can start to be built. For instance, two sites at Anthology, Deptford Foundry and Timberyard, Oxestalls Road both needed to deal with the contamination of land previously used for industrial uses in the early stages of their development. This requires costly and time consuming demolition of buildings and warehouses, wholesale site clearance and on-site decontamination.

Providing road and utility infrastructure can also extend the time before new homes are built and requires coordination with other construction and utility companies. For example, the Lewisham Gateway site required the multifaceted reconfiguration of the road network surrounding the site during the early stages of constructing phase 1.

Sites with tall buildings take longer to construct and are slower to deliver, but once completed, they provide significant numbers of new homes all together, creating a “lumpy” housing supply. For example, Timberyard, Oxestalls Road completed 203 new homes all at one time in 2019/20.

Momentum can be difficult to maintain, especially in large, phased schemes. Some schemes such as Lewisham Gateway and Timberyard at Oxestalls Road have experienced a pause between phases. Some sites are more prone to delays where they have multiple ownerships with numerous applicants, landowners, leaseholders, developers, utilities providers and other key stakeholders.

3.3 Amendments to Consented Schemes

Some consented sites have not been implemented because the landowner is now submitting new applications, or a S73 application to vary the original consent, in order to increase housing capacity on-site. This is in response to a changing policy position. Policy H1 of the 2021 London Plan encourages boroughs to “*optimise the potential for housing delivery on all suitable and available brownfield sites*”. Policy D3 also advocates that “*All development must make the best use of land by following a design-led approach that optimises the capacity of sites... Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling... In other areas, incremental densification should be actively encouraged by boroughs to achieve a change in densities in the most appropriate way*”.

Lewisham Gateway has already been consented for a higher amount of housing than originally anticipated in the outline permission in 2009. Other consented schemes are currently being reconsidered for significantly uplifted capacities including Timberyard Oxestalls Road, Leegate Shopping Centre, Surrey Canal Triangle and Excalibur. These sites are now going through pre-application discussions and design studies and will submit planning applications once again. Together, the increased capacities could generate an additional 1,700 units compared to the original consents. There may be delays whilst consideration of these applications take place, but once approved, they will increase the supply of housing in the future.

3.4 Unimplemented Site Allocations

Some sites have not been implemented despite being adopted site allocations for at least seven years. Table 8 shows that 15 site allocations from the adopted 2013 Site Allocations Local Plan and 2014 Lewisham Town Centre Local Plan have yet to gain planning consent. Their redevelopment will provide the opportunity to deliver more than 1,705 new homes.

Table 8: Unimplemented sites

Site name	Development proposed	Site ownership	Site size (hectares)	Number of homes that would have been delivered on site
Leegate Shopping Centre	Mixed use	Private	0.49	229
111 and 115 Endwell Road	Mixed use	Private	0.43	40
Acme House, 165 Childers Street MEL	Mixed use	Private	0.66	84
Dartmouth Road, west of the railway line	Mixed use	Private	0.43	74
Nightingale Grove and Maythorne Cottages	Mixed use	Private	0.22	30
PLACE/Ladywell, former Ladywell Leisure Centre	Mixed use	Public	0.93	120
Driving test centre, off Ennersdale Road	Mixed use	Private	0.41	30
New Cross Gate station sites, Goodwood Road	Mixed use	Private	0.61	148
Hatcham Works, New Cross Gate Retail Park	Mixed use	Mixed	3.67	200
Sun Wharf, Cockpit Arts	Mixed use	Private	1.00	200
Thanet Wharf, Creekside Village East	Mixed use	Mixed	0.75	226
Waldram Place & Perry Vale, east of railway line	Mixed use	Private	0.20	33
113 to 157 Sydenham Road	Mixed use	Private	0.87	98
New Cross Gate NDC scheme, Besson Street	Mixed use	Public	1.01	173
6 Mantle Road	Mixed use	Private	0.12	20
			Total	1,705

3.5 Finding New Sites

Some applicants may be waiting for sites to become site allocations within an adopted Local Plan before they submit a planning application to the Planning Service. This can take years to do and can result in sites being left undeveloped. But an adopted Local Plan gives applicants the confidence that applications will be approved without further delay, where they align with the Local Plan. The determination of planning applications for windfall sites can result in time consuming debates about the suitability of the site for housing or lengthy appeals when an application is refused on grounds of non conformity to the Local Plan.

It also takes time to carry out site analysis and to find new sites suitable for residential development and the Planning Service has had a continuous dialogue with landowners and developers to identify suitable land for housing across the borough. Starting to consider opportunities now to develop a range of new sites on public land will help to boost housing delivery a few years later. New site allocations have been identified as part of the preparation of the Draft Local Plan, given that many adopted site allocations have already been developed or now have planning consent – see section 4.6.2.

3.6 Dependence on the Housing Market

In general, the amount of housing available in the local housing market can be reliant upon a number of factors beyond the control of the Council, such as high land prices, difficulty in securing finances, profitability of sites, complex multiple land ownerships and homes being purchased as investments rather than places to live in. Whilst there is no firm evidence that these factors are severely affecting current housing delivery in Lewisham, annual monitoring should continue to identify if they become an issue in the future.

The Government has recognised that there are difficulties with the housing market nationally and has been seeking to enhance the capacity of local authorities and industry to build the new homes that the country needs. The Government recognised in its White Paper *Fixing Our Broken Housing Market* (February 2017) that as a country we have not built enough homes. It placed the responsibility for this on not enough local authorities planning for the homes they need; house building being too slow and the construction industry being too reliant on a small number of big players.

The Final Report of the Independent Review of Build Out (October 2018) prepared by Oliver Letwyn MP found that “*the homogeneity of the types and tenures of the homes on offer on large sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out*”. However, it goes on to explain that forcing major house builders to reduce the prices at which they sell their current products would create serious problems not only for the major house builders but for the housing economy as a whole.

The Letwyn Review also assessed the extent to which both start up on site and later build out rates could be affected by “*lack of transport infrastructure, difficulties of land remediation, delayed installations by utility companies, constrained site logistics and limited availability of capital, building materials and skilled labour*”. It found that more effective coordination between government departments, agencies and private sector operators is urgently required to improve and speed up the delivery of transport and utility infrastructure before the build out could start (and sometimes during the construction period) on large brownfield sites.

Housing Partnerships: Delivering the homes that London needs (June 2021) recognises that the supply of homes in London has failed to keep up with demand and that there are a complicated set of factors which make increasing housing supply in London challenging. But it goes on to say that building new homes will remain a priority in London, that a bold approach is needed to boost housebuilding and that partnerships with the private sector could be the key to unlocking housing aspirations for the boroughs. It concludes that public / private partnerships have the potential to unlock significant developments, bringing wider economic and social benefits to an area, in addition to much needed new homes.

3.7 Impacts on the Construction Industry

Leading up to and following Brexit on 31 January 2020, skills shortages, the flow of goods and materials between the UK and the EU and extra administrative burdens add to the cost and inhibit the functioning of the UK construction industry. Off-site manufacturing, the increasing use of digital technologies and the growing urgency to address climate change are also having an impact on the construction industry.

Numerous restrictions have been imposed upon the construction industry by the Covid-19 pandemic over the last 16 months, since the initial national lockdown started in March 2020. In Lewisham, like elsewhere, local businesses temporarily stopped trading, construction activity on development sites paused, new phases of construction were delayed, there was a drop in the number of planning applications submitted to the Planning Service and some CIL payments were deferred.

The full impact and long term implications of Brexit and the Covid-19 pandemic on the health of Lewisham's residents and the local economy will not become apparent until the next 2020-21 monitoring year and beyond. Future monitoring will be needed so that delays to housing delivery can be identified quickly and that the long term impacts on the construction industry, and whether it can bounce back to pre-Brexit and pre-pandemic levels, can be understood.

4. Boosting Housing Delivery

From the analysis of local housing delivery in Section 3, a range of assumptions can be made about future housing delivery:

- There is a good past performance in housing delivery and a strong supply of housing for the future but that delivery fluctuates as a result of long lead-in times before the construction of housing starts on-site. A range of monitoring activities are needed to assess the deliverability of housing, estimate the future housing supply and identify any issues adversely impacting on local housing delivery – see section 4.1.
- The Planning Service has a good track record in determining planning applications. However, it can take time to carry out pre-application negotiations, and given the scale and complexity of many sites in the borough, this is to be expected. The timely determination of planning applications can help to maintain a good supply of housing land and help reduce the time it takes for sites to be delivered – see section 4.2.
- Increasing the number of houses is important, but the housing delivered also needs to be affordable to meet local housing needs. It is worthwhile spending time negotiating the maximum amount of affordable housing in order to deliver long term benefits for local communities – see section 4.3.
- To avoid further delays in site delivery, there is a need for momentum to be maintained, especially on large, phased sites and on affordable housing schemes that the Council has control over – see section 4.4.

- To boost housing delivery further, there is a need to broaden the opportunities for developing land in sustainable locations across the borough including on public land and on small sites – see section 4.5.
- Housing growth should take place but only where it is located in sustainable locations and aligns with the spatial strategy set out in the Local Plan. Site allocations in the Local Plan provide the opportunity to maximise housing delivery and promote housing growth in specific parts of the borough – see section 4.6.
- The Council on its own cannot deliver sufficient housing needed to meet local housing needs. There is a need to engage with a range of stakeholders, to ensure that housing growth aligns with the aspirations of applications, landowners, key stakeholders and the local community – see section 4.7.
- The provision of infrastructure is a prerequisite to housing growth. It is important to ensure sufficient funds are available to deliver infrastructure in a timely manner, to coincide with housing growth – see section 4.8.

The remainder of this section explores a range of activities that the Planning Service and other teams within the Council has implemented over the last few years, to minimise the risk of under-delivery. It also identifies key actions that should be implemented in the future, in order to address the issues listed above. More in-depth details about the key actions and how they will be implemented, can be found in one consolidated table in Appendix 1.

4.1 Assessing Housing Delivery through Monitoring

4.1.1 Majors and Strategic Projects Team

A Majors and Strategic Projects Team was established within the Planning Service in 2017 to focus specifically on major proposals for development. Planners in this team solely deal with major applications, the associated conditions and smaller applications which affect the major schemes. These Officers are the Council's main contact with the applicant and seeks to ensure that ongoing engagement and continuous dialogue between all parties enables each application and development to progress in a timely manner.

Being so involved in each application, the Officers gain an in-depth knowledge of applications (submitted, superseded, reserved matters and S73 applications), anticipated timescales, build outs and phasing as well as the amount of residential units, non-residential floorspace and affordable housing to be delivered. They are a good source of intelligence, and provide essential input when updating the pipeline of committed sites in the housing trajectory and the 5YHLS.

4.1.2 Housing Completions Survey

The Planning Service conducts a housing completions survey each summer and feeds the results back to the GLA. They in turn use this data to inform the next HDT. Desk based information and site visits are used to determine progress made on each site, i.e. whether they have started construction or have been completed. The data gathered from this survey is particularly important in informing the housing trajectory and the 5YHLS.

4.1.3 Planning London Datahub

The Planning Service has been working with the GLA to implement more efficient back office systems that allows more automation of planning application and planning approval data. In the past considerable time and resources were spent inputting data from applications into the London Development Database. A new, more automated version, called Planning London Datahub, is now operational. Data from planning applications and planning approvals are fed directly from Lewisham' back office system into the Datahub, with less need for Lewisham planners to carry out time consuming data entry.

4.1.4 Maintaining Registers

The Council has two statutory registers that are maintained and updated by the Planning Service. Lewisham first prepared a Brownfield Land Register in 2017. It provides up to date, transparent and consistent information about previously developed sites in the borough that are suitable for housing development. The Planning Service updates the register each December and uses the data to monitor the status of the development sites.

Lewisham first prepared a Self-build and Custom Housebuilding Register in 2016. It is a register of individuals and associations who are seeking to acquire serviced plots of land to build houses to live in. The Planning Service uses the data held in the register to understand the level of demand for self-build housing and whether or not self-build plots have been approved to meet demand.

4.1.5 Authority Monitoring Report (AMR)

Many of the key actions arising from this Action Plan coincide with the monitoring that is already carried out through the AMR. In particular the AMR assesses the deliverability of sites against anticipated delivery timescales through the housing trajectory and 5YHLS and monitors both short term and long term delivery of housing.

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

4.2 Determining Planning Applications

4.2.1 Good Track Record

Lewisham has a busy Planning Service, with a typical year experiencing submissions of more than 3,500 planning applications and about 500 tree applications. Lewisham can demonstrate a good track record of determining applications and over the last few years' performance has remained strong. Table 9 shows that during 2019-20 all performance targets were exceeded.

Table 9: Planning application performance targets

Timescales for determining applications	Target	Performance in 2019-20
Majors determined within 13 weeks	80%	95%
Minors determined within 8 weeks	80%	93%
Other applications were determined within 8 weeks	85%	95%

Approvals made during 2019-20, if implemented, will result in a net gain of 1,347 homes, close to the target required in the 2016 London Plan. Since 2011 when the Core Strategy was adopted, an average of 2,322 net homes have been approved each year.

4.2.2 Pre-application Advice

It is important to work with applicants, landowners and developers prior to a planning application being submitted to the Planning Service. Front-loading the planning process can improve the quality of a submitted planning application and thereby can save time later on when determining the application. The Council's webpage explains the range of pre-application advice that the Planning Service now offers, including:

- Get answers to simple queries about planning processes or checks (Planning Information Service).
- Get advice on simple planning projects, (Duty Planner Standard Service).
- Get advice on complex planning projects (including listed buildings) and a written summary (Duty Planner Complex Service).
- Attend a pre-application meeting and get detailed written advice (Pre-Application Advice Service).
- Get a dedicated planning officer assigned to your project and attend a series of design meetings for large-scale, comprehensive redevelopment schemes (Planning Performance Agreement Service).

As a result of the Covid-19 pandemic, we have currently paused the Planning Information Service and Duty Planner Standard Service.

4.2.3 Planning Performance Agreements

A Planning Performance Agreement (PPA) is a project management tool used to manage planning applications. The Planning Service has secured many PPAs in the past including on complex schemes like Convoys Wharf. They enable the Planning Service and the applicant to agree the timescales, actions and resources necessary to process a planning application in a timely manner. They help to increase transparency in the planning application process and encourage collaboration between the Planning Service, the applicant and other statutory consultees. At Lewisham, all strategic sites are managed via PPAs and PPAs are also secured for the delivery of schemes after permission has been granted to ensure smooth starts on site.

4.2.4 Multi-disciplinary Advice

The Planning Service seeks to ensure that applications not only bring forward new housing but also contribute to successful place-making. High quality design is a key priority for the Planning Service and the borough is becoming known for its exceptional quality of design and has won a number of design accolades in recent years. Design advice is provided as routine on individual pre-applications and planning applications. Major applications can also receive design advice from the Design Review Panel (DRP). This is an independent panel of design professionals, acting as an advisory body to the Planning Service, who meet regularly to review development schemes. Comments from the panel are fed into the assessment of pre-applications, planning applications and appeals. By doing this, developers can respond to panel advice and have a better chance to address design concerns early on in the process, which in turn leads to higher quality designs in final consented schemes. During 2019-20 the Panel provided design advice, cumulatively, on approximately 5,000 dwellings.

A multi-disciplinary approach is used to ensure that each development achieves its full potential. Applications can be considered at Majors Meetings, with input from different teams across the Council, so that different disciplines (e.g. design, heritage, transport, housing, open space, nature conservation and sustainability) can be considered simultaneously. Specialist advice is sought, where needed, to help determine applications.

For instance, advice is provided from heritage planners where an application may impact on Lewisham's rich and diverse heritage assets. The careful integration of heritage assets has played a successful role in many regeneration schemes such as the Deptford Project where a Grade II listed carriage ramp and railway arches were sensitively restored, and converted into local retail, cafe and commercial units. A new public square in front of the carriage ramp is open for use by the public including markets and events. The scheme also included a new residential block with 132 new homes, and the redevelopment of the station entrance. It was awarded the Best Heritage Led Scheme in 2017 in the London Planning Awards. Astra House is another example where Anthology has re-developed a Locally Listed former factory headquarters building into 44 flats and enhanced its architectural and townscape qualities, alongside the wider redevelopment of the Foundry site in Deptford for 316 residential units. .

The Planning Service also works with other teams in the Council such as the Climate Resilience Team to ensure new developments respond to the ambitious target for the borough to be carbon neutral by 2030 and to comply with policy on energy efficiency etc. In 2019-20 the Climate Resilience Team reviewed over 20 major applications and pushed for higher standards to ensure new developments play their part to mitigate the worst impacts of the climate crisis.

Key action 2	To enable swift determination of planning applications through an efficient, proactive service and effective engagement with applicants.
To help achieve key action 2 the Council will: <ul style="list-style-type: none"> • Meet performance targets by determining applications within set timescales. • Encourage applicants to go through pre-application before submitting planning applications. • Encourage major, phased and/or complex developments to enter into PPAs. • Provide multi-disciplinary advice. 	

4.3 Maximising Affordable Housing on Applicable Development Sites

4.3.1 50% Affordable Housing

One of the priorities in the Corporate Strategy 2018- 2022 is to tackle the housing crisis through the delivery of more genuinely affordable homes and through more mixed communities, with a range of tenure in private developments. In line with the adopted Core Strategy Policy 1, the Planning Service seeks the maximum provision of affordable housing with a strategic target for 50% affordable housing from all sources on sites capable of providing 10 or more dwellings. Hence, 50% affordable housing units is the starting point in pre-application discussions and S106 negotiations. The Planning Service is also seeking to ensure the maximum number of genuinely affordable homes (comprising social rent and London affordable rent) from each planning consent, subject to financial viability.

4.3.2 Financial Viability Reviews

Major developments that are still under construction are periodically reviewed at specific trigger points, to check if improvements to the site's financial viability allow for additional financial contributions to be paid. So far there has been only one site where this has applied, at Renaissance at Loampit Vale. Other sites, especially large phased sites that take multiple years to be delivered, have the potential to trigger more affordable housing in the future.

To help achieve key action 3 the Council will:

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

4.4 Keeping Up Momentum

4.4.1 Directing Growth to Specific Locations

A number of streams of work are seeking to direct growth to sustainable locations within the borough. An SPD was adopted in January 2020 to provide guidance on the type, nature and design of development considered appropriate for Surrey Canal Triangle. It is a material consideration when determining planning applications within the area including the hybrid planning application for New Bermondsey which was submitted to the Council and validated in April 2021.

The Regeneration Team are leading on major regeneration plans which will transform Catford town centre by:

- Rerouting the south circular A205 road, creating more pedestrian space, with trees and planting.
- Making the heart of the town centre largely car-free, helping to improve air quality and road safety.
- Creating segregated cycle lanes, more cycle parking and wider pavements to enable cycling and walking.
- Creating a new civic hub and a cluster of affordable creative and cultural workspaces which will secure more day to evening footfall.
- Redeveloping the Catford Centre for new retail space, while maintaining the town centre's current range of diverse and independent shops.
- Replacing Milford Towers and providing new homes across the town centre.

The vision is for half of these homes to be affordable, with almost 1,000 new social homes. The process has included extensive consultation and the Catford Town Centre Framework forms part of the Local Plan evidence base. Funding from Round 3 of the Mayor of London's Good Growth Fund has been secured to enable Thomas Lane Yard to be developed. S106 funding has also been approved for pedestrian and cycle improvements between the two rail stations.

Consultants are currently preparing an A21 Development Framework to provide design guidance for development along, and close to, the A21, from Lewisham Town Centre in the north to the borough boundary with Bromley in the south. The Framework will seek to provide design guidance on how to optimise development sites, strengthen local character, improve the public realm and enhance walking and cycling facilities.

The Housing and Regeneration Teams have been working on a masterplan with the GLA for Bell Green/Lower Sydenham and lobbying for Opportunity Area status. A consultant team have been appointed to prepare a Vision Study for Lower Sydenham/Bell Green. They have finished the Vision Study which is the first stage of the development framework and masterplan for the area. The Vision Study identified the broad scale and scope for regeneration and change in the Lower Sydenham and Bell Green area, incorporating a new London Underground station. It will also help to support the case for the Bakerloo Line Extension along the Hayes line by demonstrating the transformational benefits that it will bring to the area.

Two further studies, the Lewisham Characterisation Study (2019) and the Draft Tall Buildings Study (2021), have been prepared. They seek to make optimal use of sites by considering the type, form and location of development that is suitable in the borough, taking into account surrounding character. The first study looks at using local distinctiveness to find the best locations for accommodating growth. The second study provides a methodology for determining the appropriate scale and location of tall buildings within the borough.

4.4.2 Delivering Existing Affordable Housing Schemes

An additional 1,000 new social homes have been pledged in the Corporate Strategy and the Strategic Development Team is now working to achieve this through various methods including the Building for Lewisham programme. The Council's Housing Strategy commits the Council to a key objective of delivering the homes that Lewisham needs, recognising the need to use a variety of approaches and partners to leverage the maximum number of homes for the benefit of the borough.

The Strategic Development Team are working in partnership with their primary development partner, Lewisham Homes, and we are also working in partnership with Registered Providers, private developers and local communities to enhance the existing stock of affordable housing across the borough, to provide new affordable homes and to bring about large-scale transformative change with wider regeneration benefits in existing housing estates.

Work continues on the extensive programme to renew social housing estates and provide affordable housing on Council owned land, as summarised in Table 10.

Table 10: Delivering affordable housing schemes

Site name	Progress made so far
Heathside and Lethbridge	This site has been transformed since 2010 when an outline permission was approved. A total of 565 existing units have been demolished, to make way for 1,218 new units, a net increase of 653 units. The scheme was granted outline consent over 6 phases. To date Phases 1, 2, 3 and 4 have been completed, providing 782 new units. Phases 5 and 6 consisting of 436 new homes were granted consent in April 2019 and building work has now commenced. They are due to be completed in phases between March and November 2022.
Excalibur Estate	This site was approved in March 2012 and has been experiencing a phased approach to demolition and rebuild across the site. A total of 178 existing units are to be demolished to make way for 362 new units, a net increase of 185 units. Phases 1 and 2, consisting of 57 new homes, have been completed. Further pre-app discussions are ongoing and a new planning application will be submitted for the last phases in 2021.
Besson Street	This site has a lapsed application dating back to 2009. In December 2015 the Council agreed to form a 50/50 Joint Venture vehicle with a partner (Grainger plc) to build bespoke build-to-rent homes. In July 2020, the Strategic Planning Committee considered a comprehensive mixed use development including 324 residential units and granted a resolution to approve, subject to a S106. Construction is expected to start in summer 2022 with first completions anticipated in 2024. This scheme has been cited as a best practice case study in <i>Housing Partnerships: Delivering the homes that London needs</i> (2021).
Achilles Street	A ballot took place in November 2019, with a vote in favour of redevelopment, backed by 73% of eligible residents. It is estimated that around 450 homes in total could be built, although this number will be finalised through the design process. A minimum of 50% of the total homes built will be affordable, and a minimum of 35% of the total homes built will be Council-owned homes for social rent, with the aim to increase the number of social rented homes by as much as possible.
Former Ladywell Leisure Centre	The Council has been working in collaboration with Lewisham Homes, to deliver circa 69 homes at the rear of the site and to further extend the temporary permission to retain the PLACE/Ladywell building to the front of the site which is currently providing 24 homes for homeless families.

Former Tidemill School	The Council is working with Peabody to provide 209 new homes. This includes 117 new social rented homes, 41 low-cost shared ownership homes for first-time buyers and 51 homes for sale. The project started on site in November 2020.
Amersham Vale	Also with Peabody, this 120 unit development is on track to complete and handover 24 new social homes and 15 for shared ownership later in 2021.
Pomeroy Street	This is another Peabody development nearing completion in Pomeroy Street, with a mixed use development including 18 affordable rented homes that are due for handover by spring 2021.

4.4.3 Modular Building

The Council is committed to providing more genuinely affordable homes in innovative modular properties, building on the success of PLACE/Ladywell - an innovative development that was manufactured off-site and has won multiple design awards. Plans are currently underway for a two phase development on the former leisure centre site which will deliver circa 230 new homes in two phases, with phase one delivering circa 69 homes behind PLACE/Ladywell, and phase two delivering the remainder of homes over the coming years.

The advantage of these modular schemes are that they are relatively quick to build, compared to traditional methods of on-site construction. Three further MMC schemes for residential and commercial / community spaces are planned across the borough at Edward Street (34 units), Mayfield (circa 47 units) and Home Park (31 units).

Key action 4	To maintain momentum in delivering housing schemes especially on large, phased sites and affordable housing schemes on public land.
To help achieve key action 4 the Council will: <ul style="list-style-type: none"> • Complete studies and use them to inform future growth at Surrey Canal Triangle, Catford Town Centre, along the A21 corridor and Bell Green/Lower Sydenham. • Deliver 1,000 new homes on Council land and progress estate regeneration schemes. • Deliver modular buildings on three sites. 	

4.5 Identifying New Housing Schemes on Public Land

4.5.1 Housing Growth Team

In 2018 the Council received approval for GLA funding from the Homebuilding Capacity Fund to establish a Housing Growth Team. It is comprised of staff from both housing and planning teams and is specifically tasked with preparing a pipeline of future Council led schemes. To date, the Housing Growth Team have appointed consultants to work on two studies - the A21 Development Framework (see sections 4.4.1) and Small Sites Study (see section 4.5.3) and have also created a pipeline of more than 500 new homes.

4.5.2 Infill Housing

The Strategic Development Team has been investigating opportunities to re-develop garage land and other miscellaneous public land. A number of small developments have already been delivered directly or indirectly by the Council and/or Lewisham Homes, providing 53 affordable and intermediate homes on the land to the rear of Chiddingstone House, Lewisham Park and 27 affordable homes at Longfield Crescent Estate. The Council and Lewisham Homes will continue to assess the development potential for new social rented homes as infill housing to replace Council-owned garage sites or underused land.

4.5.3 Small Sites

In September 2020 the Strategic Housing Team commissioned consultants to prepare a Small Sites Study, working in collaboration with the Strategic Planning Team and part funded by the GLA's Homebuilding Capacity Fund. The study seeks to provide design guidance for small sites development throughout the borough and aims to make the best use of available land by increasing and diversifying the delivery of new affordable homes and improving streetscapes and public realm of left over or under-developed plots of land. Consultation took place between March and June 2021 and the responses received are now being considered.

Key action

5

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

To help achieve key action 5 the Council will:

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

4.6 Facilitating Growth through Planning Policies

4.6.1 Local Plan

The Strategic Planning Team has already started to prepare a Local Plan that will eventually replace the current statutory development plan for the borough (made up of the 2011 Lewisham Core Strategy, 2013 Site Allocations Local Plan, 2014 Lewisham Town Centre Local Plan and 2014 Development Management Local Plan). It will provide a shared vision for the future of the borough through to 2040, with a clear framework in place to positively manage growth and new development in a way that respects the distinctive character and diversity of the borough. It will help to ensure that investment decisions meet the aspirations of local communities and contribute to sustaining and creating inclusive, safe, healthy and liveable neighbourhoods, in addition to promoting the delivery of new homes. The Local Plan guides developers, reduces ambiguity when determining planning applications and provides a stronger defense against planning proposals that conflict with the policies in the plan.

Following a previous consultation on Issues and Options, a Draft Local Plan 'Main Issues and Preferred Approaches' document has been prepared. Regulation 18 statutory public consultation took place between January and April 2021. The Strategic Planning Team is now starting to prepare the Regulation 19 version of the Local Plan, taking into account the responses received during the previous consultation.

4.6.2 Identifying New Site Allocations

Work on the Local Plan is underpinned by constant engagement with key stakeholders including ongoing informal discussions and meetings with a range of landowners and developers.

The Strategic Planning Team has worked in partnership with the GLA to identify new housing sites through past London-wide SHLAA exercises, including in 2013 and 2017. In the 2017 exercise, a total of 369 sites were assessed. At that time 43% of the sites assessed were found to be suitable for residential development. Since then, 66 of the sites identified through the London SHLAA have been brought forward as site allocations in the Draft Local Plan. Note some of the sites identified in the 2017 SHLAA have subsequently been delivered.

Recognising that many of the site allocations in the adopted Local Plans have already been built out or have already gained planning consent, the Strategic Planning Team have sought to identify new sites suitable for development by carrying out two ‘call for sites’ consultations and inviting the public (including landowners, agents and developers) to submit sites for consideration in the Draft Local Plan. The consultations commenced in June 2015 and September 2018. 46 sites were submitted in 2015 and 39 sites were submitted in 2018. Three new sites identified through these consultations (that hadn’t previously been identified through the London SHLAA work) have been brought forward as site allocations in the Draft Local Plan.

Following conversations with other teams within the Council and key stakeholders, the Strategic Planning Team also identified another 12 sites that have been brought forward as site allocations in the Draft Local Plan.

The Strategic Planning Team also carried out an early engagement exercise with landowners in August 2019, targeting 75 landowners on 31 of the draft site allocations. 17 responses were received and these have been fed into the draft site allocations in the Draft Local Plan, helping to tailor the site allocations to the aspirations of the landowners.

Overall, a total of 378 sites have been considered and 81 of the sites, equivalent to 21% of all sites considered, have been included in the Draft Local Plan as draft site allocations.

The site allocations will be instrumental in significantly increasing the delivery of new homes, to support the growth envisaged in the Local Plan. These site allocations and the anticipated windfall allowance together have the potential capacity to deliver approximately 25,000 net new homes. This in turn will help to achieve the housing target of 1,667 units per year in the 2021 London Plan. Their delivery will also be an important component in being able to meet the HDT in the future.

The Strategic Planning Team are currently considering a new set of sites submitted as part of the latest call for sites exercise, which coincided with the Regulation 18 Local Plan consultation in January 2021. Where new sites are found to be suitable and deliverable for residential or mixed use development, they will be included as new site allocations in the emerging Local Plan, further boosting the future housing supply.

Key action 6	To ensure the site allocations in the Draft Local Plan maximise opportunities for housing delivery.
To help achieve key action 6 the Council will:	
<ul style="list-style-type: none"> • Prepare the Regulation 19 version of the Local Plan. • Amend the draft site allocations in the Local Plan in line with the responses received through the Regulation 18 consultation. • Consider new sites submitted during the Regulation 18 consultation and where relevant add new site allocations into the Regulation 19 version of the Local Plan. • Continue to liaise with landowners and key stakeholders during the preparation of the Local Plan. 	

4.7 Stakeholder Engagement

4.7.1 Planning Consultations

The Council carries out a variety of planning consultations to inform and support the preparation of the Local Plan and other planning documents. A recent example of this is the Local Plan Main Issues and Preferred Options Regulation 18 consultation that took place during January – April 2021.

A wide range of techniques were used to engage with the community including site notices, sending notification letters and emails to people on the consultation database, key stakeholders, landowners and leaseholders, holding a series of community meetings through Zoom and placing online consultation material on the Council’s website including a short, reader friendly summary document to help local communities learn about the new Local Plan. More than 1,400 responses were received from residents, businesses, landowners and other stakeholders. Their responses will be used to refine the Regulation 19 version of the Local Plan and help make it a realistic, deliverable framework for growth.

In addition to formal consultations, a range of both formal and informal engagement activities with landowners and stakeholders, as described in section 4.6.2, has also taken place throughout the preparation of the Local Plan with the aim of identifying new housing sites and shaping / refining the site allocations contained within the Local Plan and updating the pipeline of sites on a frequent basis.

4.7.2 Working with Key Stakeholders

The Council has a Duty to Cooperate with a variety of stakeholders and the Planning Service carries out ongoing discussions, and engages with, a range of specific and general consultation bodies as well as Duty to Cooperate bodies such as the Mayor of London, Homes England, Environment Agency, Historic England, Natural England, Transport for London, Highways England, Office of Rail Regulation, Civil Aviation Authority, Marine Management Organisation, Clinical Commissioning Groups, Local Enterprise Partnership and the surrounding London Boroughs of Bromley, Southwark, Bexley, Tower Hamlets and the Royal Borough of Greenwich.

The Planning Service is preparing Statements of Common Ground with key stakeholders, a Duty to Cooperate Statement and a Consultation Statement, to demonstrate all of the consultation activities that have taken place during the preparation of the Draft Local Plan. These are living documents and they will be updated as the Draft Local Plan progresses towards adoption.

Frequent meetings are also held with a range of community groups, amenity societies, ward assemblies and Neighbourhood Forums. These will continue in the future, with the aim of fostering good relationships between the Council and the community it serves.

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

Key action 7	To enhance partnership working to ensure the coordinated provision of housing.
To help achieve key action 7 the Council will:	
<ul style="list-style-type: none"> Meet with, and collaborate with, different teams within the Council, land owners, developers, key stakeholders such as the GLA and TFL, community groups and the general public. 	

4.8. Investing in Infrastructure

4.8.1 Development Contributions Team

The S106 and CIL collected in the borough will ensure that developments delivered in Lewisham are accompanied by the infrastructure necessary to support growing communities. Developer contributions are an important financial resource for the Council and there is a direct correlation between the amount of development taking place in the borough and the amount of S106 funds available.

Lewisham CIL has been charged in the borough since April 2015. This is levied as a non-negotiable charge made on applicable developments and calculated on a per square meter basis. 70% of CIL receipts received go on to fund strategic infrastructure whilst 5% is spent on administration and 25% is retained for neighbourhood projects.

In 2021 the Development Contributions Team (DCT) was formed and additional resources have been committed to expand the team, so that the signing of s106 agreements can be made more efficient, collection of CIL s106 payments can be speeded up, and to improve processes around the spend of s106 and CIL monies which fund a range of infrastructure projects. This has the potential to speed up the delivery of development sites, in addition to providing much needed infrastructure across the borough. Enhanced in-house monitoring of S106/CIL will also take place through the Infrastructure Funding Statement, to be published annually each winter.

4.8.2 Infrastructure Delivery Plan (IDP)

Infrastructure is an important pre-requisite to the delivery of housing. The IDP sets out the borough's future requirements for infrastructure, to accompany the growth envisaged in the Draft Local Plan. It provides details of specific projects including the lead organisation, location, expected timescales for delivery and funding requirements for each project. The IDP is a living document and will be updated as it is further developed with infrastructure providers and other stakeholders as the Draft Local Plan progresses towards adoption.

4.8.3 Investment in Transport

Proximity to sustainable transport, car free developments, cycle storage, payments towards new bus routes, improvements to walking routes or electric car charging points are looked on favourably when determining planning applications. Planning consents should also seek to address deficiencies in the existing transport infrastructure and seek to implement Lewisham's Transport Strategy, Rail Vision, Cycling Strategy and Local Implementation Plan (LIP).

New, strategic scale transport infrastructure can be instrumental in boosting the delivery of housing. The Council is supportive of proposals to improve existing infrastructure including the DLR, East London Line overground, metroisation, and new interchanges at Lewisham, New Cross Gate and Brockley stations. The Planning Service has been proactively securing and collecting S106 contributions from developments around Lewisham town centre in order to support the future delivery of improvements to Lewisham railway station.

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

Key action

8

To ensure the efficient operation of S106 and CIL so that infrastructure can be delivered in a timely manner alongside housing growth.

To help achieve key action 8 the Council will:

- Update the IDP, to accompany the Regulation 19 version of the Local Plan.
- Monitor S106 and CIL funds on an annual basis through the Infrastructure Funding Statement and publish the IFS each winter.
- Work with partners to implement transport improvements including the BLE (Phase 2) to Hayes.

5. Project Management

5.1 The Next Action Plan

The Corporate Strategy 2018- 2022 is committed to tackling the housing crisis and this Action Plan identifies number of key actions to help achieve this. Additional details relating to each key action can be found in Appendix 1, specifying:

- The range of activities that need to be carried out to achieve the key action.
- The timescales that it will take to carry out the activities including in the immediate, short, medium and long-term.
- The current status of the activity and whether it is already ongoing or has not yet started, (including where recurrent annual activities have not yet begun for this year).
- The teams who will be responsible for carrying out the activities, including specific teams within the Planning Service and other teams within the Council.

The key actions proposed in Appendix 1 cannot be implemented by one team alone and will require cross-departmental collaboration to boost housing delivery in the future. The Strategic Planning Team (Policy) will liaise with the lead teams responsible for the key activities, to monitor their progress and ensure progress is being made.

Key action 9	To track the progress made towards achieving the key actions in Appendix 1, in future Action Plans.
To help achieve key action 9 the Council will prepare the next Action Plan (where the HDT result is less than 95%) and will: <ul style="list-style-type: none">• Review any progress made so far.• Identify new initiatives that have taken place.• Consider the need for new key actions, as appropriate.• Publish the Action Plan on-line.	

Appendix 1: Key Actions

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

Key action	Success Activities to be carried out in order to achieve key action.	Timescale Immediate (< 3 months) Short-term (3-6 months) Medium-term (6-12 months) Long-term (> 12 months)	Status	Project lead
Key Action 3: To seek to maximise the amount of housing in applicable developments and in particular strive for higher amounts of genuinely affordable housing.	Use the 50% target as the starting point for negotiations on all applicable developments.	Immediate	Ongoing	Planning Service: - Development Management Team - Majors and Strategic Projects Team - Strategic Planning Team (Development Contributions Team) Strategic Development Team
	Conduct financial viability reviews and trigger more affordable housing, where applicable.	As and when required	Ongoing	
Key Action 4: To maintain momentum in delivering housing especially on large, phased sites and affordable housing schemes on public land.	Complete studies and use them to inform future growth at Surrey Canal Triangle, Catford Town Centre, along the A21 corridor and Bell Green/Lower Sydenham.	Long-term	Ongoing	Strategic Development Team Planning Service: - Strategic Planning Team (Policy) - Strategic Planning Team (Design and Conservation) - Majors and Strategic Projects Team - Development Management Team
	Deliver 1,000 new homes on Council land and progress estate regeneration schemes.	Long-term	Ongoing	
	Deliver modular building on three sites.	Long-term	Ongoing	
Key Action 5: To investigate opportunities to bring forward new housing development on other public land and on small sites	Adopt the Small Sites Study to encourage development on small sites.	Long-term	Ongoing	Strategic Development Team Planning Service: - Majors and Strategic Projects Team - Development Management Team - Strategic Planning Team (Design and Conservation) - Strategic Planning Team (Policy)
	Optimise the use of small sites through infill development on garage and under-used public land			
Key Action 6: To ensure the site allocations in the Draft Local Plan maximise opportunities for housing delivery.	Prepare the Regulation 19 version of the Local Plan.	Immediate	Started	Planning Service: - Strategic Planning Team (Policy)
	Amend the draft site allocations in the Local Plan in line with the responses received through the Regulation 18 consultation.	Immediate	Started	
	Consider new sites submitted during the Regulation 18 consultation and add in new site allocations into the Regulation 19 version of the Local Plan.	Immediate	Started	
	Continue to liaise with landowners and key stakeholders during the preparation of the Local Plan.	Immediate	Ongoing	

Key action	Success Activities to be carried out in order to achieve key action.	Timescale Immediate (< 3 months) Short-term (3-6 months) Medium-term (6-12 months) Long-term (> 12 months)	Status	Project lead
Key Action 7: To ensure the efficient operation of S106 and CIL so that infrastructure can be delivered in a timely manner alongside housing growth.	Update the IDP, to accompany the Regulation 19 version of the Local Plan.	Medium-term	Started	Planning Service: - Strategic Planning Team (Development Contributions Team) - Strategic Planning Team (Policy) - Development Management Team - Majors and Strategic Projects Team
	Monitor S106 and CIL funds on an annual basis through the Infrastructure Funding Statement and published the IFS each winter.	Medium-term	Ongoing, carried out annually	
	Work with partners to implement transport improvements including the BLE (Phase 2) to Hayes	Long-term	Ongoing	
Key Action 8: To enhance partnership working to ensure the coordinated provision of housing.	Meet with, and collaborate with, different teams within the Council, land owners, developers, key stakeholders such as the GLA and TFL, community groups and the general public.	Immediate	Ongoing	Planning Service: - Business Improvement Team - Strategic Planning Team (Policy) - Strategic Planning Team (Design and Conservation) - Strategic Planning Team (Development Contributions Team) - Development Management Team - Majors and Strategic Projects Team
Key Action 9: To track the progress made towards achieving the key actions, in future Action Plans.	Number of key actions completed and/or progressed.	Medium term	Not started	Planning Service: - Strategic Planning Team (Policy)