

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

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Our ref:
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Dear Renee,

**Lewisham Council Local Development Framework: Publication of Development Policies
Local Plan**

The Greater London Authority has put together written comments in response to the Inspector's initial concerns and queries about the soundness of the plan and Lewisham's response to them. Please note that this includes comments relating to general conformity with the London Plan as well as other comments to clarify or improve policy.

Affordable Housing – DM7

Officers from Lewisham and the GLA worked together on the issue of non-conformity in relation to affordable rent raised by the GLA. Whilst the GLA welcomes Lewisham Council's initial amendments to Policy DM7 and the removal of Clauses 2b and 2c, the proposal as it stands is still in conflict with the London Plan. Below are the reasons:

Firstly, the Policy should be clear that the Council seeks to maximise affordable housing provision in line with the London Plan. Secondly, the Revised Early Minor Alterations (REMA) to the London Plan is clear that affordable rent should be considered as meeting the same need as social rent. The Policy should therefore support affordable rent as a product for people eligible for social housing and should not prioritise social rent above affordable rent. Clause 2 suggests that only a certain percentage of affordable rent units will be acceptable, this could restrict the delivery of affordable housing and prevent maximisation. There is an inconsistency in the way the policy and the supporting text is drafted; DM policy 7 refers to the percentage of dwellings designated for affordable rent (i.e. the number of units let as affordable rent) whereas the supporting text (para 2.75) relates to the rent levels of those affordable rented units. Neither approach is in conformity with the London Plan.

The Mayor is concerned that the wording in Clause 2 could reduce the level of affordable housing delivered by limiting the amount that can be delivered as affordable rent, be used as a cap on affordable rent levels and could also constrain maximisation of affordable housing. It is therefore suggested that the wording be removed as affordable rented housing can be let at a range of rents and is let to a range of people who are eligible for social housing.

In terms of rent setting, while the Policy does not explicitly set rent levels, the policy wording and supporting text suggest that it will be used as a hook to reduce rents. This could prevent maximisation and therefore is not in conformity with the REMA as explained above.

In discussions with the Council the GLA proposed the following wording;

DM Policy 7 – Within the context of core strategy policy 1, when considering the affordable housing mix the council will take account of a range of issues to ensure that the delivery of affordable housing is maximised and schemes remain viable. When providing affordable rented housing, priority will be given to delivering family housing (3 or more bedrooms) at or around target rent levels.

The council however, have not taken on board this suggestion and continued with their proposed modifications. We hope to continue dialogue to see if an agreement can be reached, but for the reasons outlined above, the council's proposed modification are not in conformity with the London Plan.

Student housing - DM8

The GLA supports the change made by the Council on student housing provision under para 2.78.

Mixed Use Employment Locations - DM9

Although the objectives of Policy DM9 are supported, the GLA is of the view that the application of Clause 4 of the policy in locations which may be unviable for non-residential uses in close proximity to residential uses could be detrimental to the overall objectives of the policy and the provision of new homes in the borough. The Policy should therefore be supported by evidence of sufficient demand for non-residential uses to support re-provision and justify the core strategy's requirement of 20% B use. This is to avoid a blanket application of the policy and its Clause 4 in areas where non-residential units are sitting vacant or are not viable.

Transport

Shopfronts, signs and hoardings - DM19

At consultation stage, TfL proposed a revision to Policy DM19 that made reference to pedestrians, cyclists and public transport operations. Whilst this was accepted by Lewisham, the Inspector noted that the term "public safety" as defined in government advertising regulations would cover the safe use and operation of any form of traffic or transport on land, including the safety of pedestrians. TfL accepts the Inspector's revisions but would like to see the term public safety defined as part of an addendum to the policy itself or within the glossary, or at least through a reference made to the Advertising Regulations document to ensure consistency in the application of this policy.

Car Parking - DM29

It is noted that the London Plan standards for car parking will not be reproduced within this document and that the reader is expected to refer to the Core Strategy for further detail.

It is understood that "car limited development" will be defined within the plan at the request of the Inspector which is a welcome revision. There is also a commitment to pursue developments with car

parking below London Plan standards which is also welcomed in the right locations according to public transport accessibility and land use.

It appears that the revised document will also make reference to the London Plan requirement for passive EVCP provision; the borough should clarify whether this is the case.

Omission issue - Waste

To help determine development proposals for waste facilities in Lewisham, the GLA is of the view that a signpost to the criteria set out in London Plan Policy 5.17B should be included in the Development Policies Local Plan.

Omission issue - Strategic views

The GLA welcomes the changes proposed by the Council in Policy DM30 and in paragraph 2.242.

If you would like to discuss any of the above comments in more detail, please contact Hermine Sanson (020 7983 4290).

Yours sincerely



Stewart Murray
Assistant Director – Planning

cc Len Duvall, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning and Housing Committee
Eric Pickles, Secretary of State
National Planning Casework Unit, DCLG
Alex Williams, TfL