

# Sustainability appraisal and strategic environmental assessment

## Core Strategy options report

February 2009

Copy for public consultation



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# 1. Non-technical summary

## 1.1 Introduction

- 1.1 This document is the Sustainability Appraisal (SA) report of the Lewisham Core Strategy Options Report. The Core Strategy is technically known as a development plan document or DPD and is a key stage document in preparing the main town planning strategy for Lewisham that will set out the vision, objectives and policies to guide development and change in Lewisham over the next 15 years.
- 1.2 It is a legal requirement that the Council prepare both a Core Strategy and a SA report, as specified in the 2004 Planning and Compulsory Purchase Act. The SA process also incorporates the legal requirement to undertake a Strategic Environmental Assessment (SEA) of the Core Strategy. The SEA process is explained in section 3.3 of the main report.
- 1.3 The purpose of SA is to make sure that all the things which are referred to as 'sustainability issues' such as using public transport not the private car, the impact of flooding or climate change or the pressures placed on open space from an increasing population, are taken into account when preparing the Core Strategy or another development plan document. The idea is that the development plan will be the most sustainable strategy as it will have taken into account all the sustainability issues as part of the process of preparation.
- 1.4 The SA does not just focus on environmental issues but also includes social and economic considerations. The appraisal was carried out in parallel with developing options for the Core Strategy Options Report and the assessment results will feed back into the Core Strategy again and again until a balanced approach is reflected and the most sustainable approach is adopted.
- 1.5 This section is a non-technical summary of the SA and SEA Report of the Core Strategy Options Report. It summarises the stages of the SA process, a statement of likely significant effects of the Core Strategy Options Report and a section on how the process has made a difference to date. The main report is structured as follows:

Section 2 provides an Introduction

Section 3 deals with the Process

Section 4 shows what was appraised

Sections 5 and 6 deal with the baseline and context issues

Section 7 deals with the SA objectives

Section 8 deals outlines the main content of the Core Strategy Options Report

Section 9 summarises the findings of the appraisal

Section 10 shows the Cumulative effects

Section 11 deals with monitoring and

Section 12 shows the next steps.

## 1.2 Summary of the SA processes

1.6 The government has set out the methodology to carry out the SA process in the good practice guidance called 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents', published by ODPM<sup>1</sup> in 2005.

1.7 The guidance identifies the following stages:

Stage A	Setting the context and objectives, establishing the baseline and deciding on scope
Stage B	Developing and refining options and assessing effects
Stage C	Preparing the SA report
Stage D	Consulting on the preferred options of the DPD and the SA report
Stage E	Adoption and monitoring plans

1.8 **This report reflects Stage C, Preparing the SA report.**

1.9 Since the good practice guide was published in 2005 the government has revised the rules for producing a development plan document. The new rules are set out in a publication called Planning Policy Statement 12 'Local Spatial Planning', published in June 2008. This has changed Stage D so that the SA report will now relate to a draft plan and a final plan. However, the methodology remains unchanged.

## 1.3 Statement of the likely significant effects of the plan (Core Strategy Options Report)

### Strategic spatial options

1.10 The London Borough of Lewisham has put forward two strategic spatial scenarios.

- Strategic Spatial Option 1 proposes borough-wide regeneration and growth and
- Strategic Spatial Option 2 proposes a more moderate approach to regeneration and growth.

1.11 Under Strategic Spatial Option 1, the Council is seeking to allocate certain land in Deptford and New Cross currently designated as a Strategic Industrial Location (SIL) or Local Employment Location (LEL) for mixed use development. The sites would be the location of significant numbers of new homes, jobs and training opportunities. Spatial Option 1 goes beyond the requirements of national and regional policy requirements of meeting targets on housing, retail, and other job and employment uses.

1.12 Spatial Option 1 seeks to locate the growth in jobs and homes in a corridor through the centre of the borough – stretching from Catford town centre through Lewisham town centre and includes development sites in Deptford and New Cross. This 'regeneration and growth corridor' will capitalise on the good public transport accessibility of the area and the need to maximise the use of scarce land through intensification of land uses in town centres and on redesignated employment land. This will be used as a catalyst for major regeneration across the borough.

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<sup>1</sup> Now called as CLG: Communities and Local Government.

- 1.13 Whereas, Strategic Spatial Option 2 proposes to meet minimum targets for housing set out in national and regional guidance. This would be achieved by locating the necessary growth in Catford and Lewisham town centres and the London Plan opportunity area locality of Deptford. The key difference between Spatial Option 1 and 2 would be that the sites proposed for mixed use development in Spatial Option 1 would continue operating as SIL and LEL.
- 1.14 While Spatial Option 2 delivers the required homes it does not change the employment and physical structure of the Deptford and New Cross area. The continued use of the identified sites for industrial use will not generate sufficient investment to change the nature of these places. As the mixed use sites are large areas it is possible to design place shaping schemes that can transform the physical shape of the area. Under Spatial Option 2 this would not be delivered.
- 1.15 The SA suggests that there are more opportunities linked to the Spatial Option 1. This option would help meet the housing requirements identified in the Strategic Housing Market Assessment (SHMA) study. Concentrating more job and employment opportunities in the north of the borough, in particular the wards of Deptford and Evelyn (with the highest level of deprivation) will directly benefit from such a strategy. It also helps in rejuvenating the local economy and providing social infrastructure by regenerating much deprived wards in the borough and creating opportunities for revitalising existing town and district centres.

### **Policy options**

- 1.16 It is expected that new development will be constructed to the highest standards of sustainable design and construction as proposed by the Core Strategy policy options. There are opportunities available to provide on-site renewable energy, decentralised energy systems, promote the Code of Sustainable Homes and BREEAM 'very good' to 'excellent' standards in new buildings, and ensure the efficient use of energy and other natural resources. This approach will help reduce the dependency on conventional fuel types for electricity and heating needs and will contribute towards achieving regional and national CO2 reductions targets, hence mitigating climate change.
- 1.17 However, issues relating to flood risk, local air quality and waste generation are vulnerable to how development takes place. In all circumstances, the risk of flooding must be considered and any necessary mitigation and adaptation measures must be taken into account. The Council has produced a Strategic Flood Risk Assessment (SFRA) and Sequential Test for assisting consideration of planning applications.
- 1.18 It is anticipated that the amount of public open space per 1,000 population will be reduced as a result of high density housing and the increase in population. The suggested policy approach for open space focuses on improving the quality of existing spaces rather than just seeking an unrealistic increase. It will still be necessary to protect any existing open space and make provision for additional open space where feasible, particularly in areas identified as deficient in provision.
- 1.19 The increased development may lead to habitat loss, particularly on sites that are derelict and vacant. The demand for development, and in particular housing is unlikely to prioritise these habitats. However, mitigation measures include introducing 'living roofs and walls' in



new development and requiring on-site green open space in large scale development proposals.

1.20 Some temporarily effects have been identified on the natural environment during the construction phase especially on local air quality, and noise and vibration, which could be mitigated by introducing site specific measures.

1.21 In a built up urban area like Lewisham land will always be a scarce resource, especially due to the increasing demand for homes, employment opportunities and other supporting community and infrastructural facilities needed to support the existing and future population growth. So, it is important to seek a balance to promote a range of land uses to create sustainable and balanced communities.

#### **1.4 Statement of the difference the process has made so far**

1.22 As stated earlier, the SA process was carried out in parallel to the plan making process (the preparation of the Core Strategy Options Report), therefore all findings during the process were integrated into each round of discussion among the members of the Planning Policy team and are reflected in the current version of the Core Strategy Options Report.

1.23 The SA process has helped in comparing the two strategic spatial options and highlighting the key benefits of one over the other as set out in the previous section. The appraisal and discussion process also helped remove unrealistic alternative options.

1.24 The SA has helped to identify areas where the policy options can be strengthened to further ensure it delivers sustainable development. Below is a summary of the key changes made to the policy options as a result of the sustainability appraisal:

- Identified the need for a financial viability assessment for the affordable housing option
- Implementing Level 4 of the Code for Sustainable Homes by 2010
- Including sustainable design and construction and energy efficiency measures into new building design requirements
- Promoting 'living roofs and walls' as a design option
- Providing training opportunities as part of the construction process
- A need for social and transport infrastructure to accompany the housing growth
- Improving the provision and quality of open space
- Conserving water resources as part of new development
- Providing the required sites for waste disposal
- Reducing the risk of flooding from new development and
- Promoting public transport, walking and cycling.

#### **1.5 How to comment on the report**

This report is open for public comment and you can tell us what you think about any part of this SA report. We would be particularly interested in any feedback on section 9 of the main report that compares the core strategy options against the sustainability objectives.

Comments must be in writing and can be made in any of the following ways:

**Web**

Ideally we would like you to provide your comments on-line against the relevant section at the following address:

<http://consult.lewisham.gov.uk/portal>

**Post**

Planning Policy  
London Borough of Lewisham  
5th Floor, Laurence House  
1 Catford Road  
Catford, SE6 4SW

**E-mail**

[Planning.policy@lewisham.gov.uk](mailto:Planning.policy@lewisham.gov.uk) with 'LDF Core Strategy SA Report' as the subject.

## 2. Introduction

- 2.1 This report is the Sustainability Appraisal (SA) of the Lewisham Core Strategy Options Report. The purpose of SA is to promote sustainable development in plan preparation by integrating sustainability considerations into the preparation and adoption of plans.
- 2.2 All councils need to produce a group of documents setting out their planning strategy and policies which collectively is called the Local Development Framework (LDF). The Core Strategy forms the central part of the LDF and will set out the vision, objectives, strategy and policies to guide development and change in Lewisham over the next 15 years. The Core Strategy will show:
- the areas where major regeneration will and are proposed to occur in Lewisham
  - where additional housing is proposed to be located and the quantity across the borough and
  - what this means for transport; community, health and education facilities, our parks, and any other aspect related to ensuring Lewisham is the best place to live, work and learn.
- 2.3 As part of the process for preparing the Core Strategy, the Council is statutorily obliged to undertake a Sustainability Appraisal (SA)<sup>2</sup> and a Strategic Environmental Assessment (SEA)<sup>3</sup>.
- 2.4 These procedures have been combined into a single appraisal process entitled Sustainability Appraisal or SA for which the overall aim is to ensure that the Core Strategy contributes to the achievement of sustainable development.

## 3. Process so far

- 3.1 This SA forms the continuing SA of the options in preparing Lewisham's Core Strategy which began in 2005 and builds upon the SA work carried out in 2007 as part of the preferred options stage.
- 3.2 The government has set out the methodology to carrying out the SA process in the good practice guidance called *Sustainability Appraisal or Regional Spatial Strategies and Local Development Documents* published by the ODPM (now the Department for Communities and Local Government) in 2005. This SA has been prepared in accordance with this guidance.
- 3.3 Sustainability appraisal is an ongoing process, which seeks to improve the sustainability performance of a plan (such as the Core Strategy) by testing it throughout its preparation in order to expose any weaknesses in its contribution to achieving sustainable development. It is an integral part of good plan-making, and to enable it to be effective and worthwhile, the appraisal must start early in the plan-preparation process. By doing so, SA assists with the

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<sup>2</sup> The Sustainability Appraisal (SA) fulfils the requirement of section 39(2) of the Planning and Compulsory Purchase Act 2004 which states that Sustainability Appraisal is mandatory for development plan documents (DPDs). The core strategy is a DPD.

<sup>3</sup> The EU Directive 2001/42/EC on assessment of effects of certain plans and programs on the environment (the 'SEA Directive').



identification of sustainability issues and options, which in the case of the Core Strategy, will be refined through the SA process into policies to form its eventual content.

3.4 The process for undertaking a sustainability appraisal is shown below.

Stage A	Scoping report	Setting the context and objectives, establishing the baseline and deciding on scope
Stage B	Issues and Options SA report	Developing and refining options and assessing effects
Stage C	Preferred Options SA report	Preparing the SA report
Stage D	Preferred Options SA report	Consulting on the preferred options of the DPD and the SA report
Stage E	Final SA report	Adoption and monitoring plans

3.5 Since the SA good practice guidance was published in 2005, the government has revised the procedures for producing a development plan document such as the core strategy. The new procedures are set out in a publication called Planning Policy Statement 12 'Local Spatial Planning' published in June 2008. This has changed Stage D, so that the SA report will now relate to a draft plan and then a final plan. Importantly the SA methodology remains unchanged.

3.6 Preparation of the scoping report (Stage A) was carried out between March and May 2005.

3.7 The development and refinement of the options, including appraisal of the alternatives, was carried out between January and August 2006 (Issues and Options).

3.8 The Sustainability Appraisal of the preferred options for the Core Strategy was carried out in February and March 2007.

3.9 This SA report acts as a further round of 'preferred options' appraisal of the Core Strategy.

### 3.1 Who carried out the SA

3.10 The Scoping Report and SA reports (appraisal of the issues and options and preferred options) have been prepared by officers from the London Borough of Lewisham's Planning Services Planning Policy team, with input from other relevant services such as transport, housing and the like.

### 3.2 Who was consulted, when and how

3.11 All stages of the sustainability appraisal preparation have been in accordance with the Council's Statement of Community Involvement (SCI) and other statutory requirements.

3.12 The four (now three) Statutory Consultation bodies (Environment Agency, English Heritage, Countryside Agency, English Nature<sup>4</sup>) were and will continue to be consulted throughout the SA process.

### **3.3 Compliance with the SEA Directive/Regulations**

3.13 This SA report incorporates the European requirements to undertake a Strategic Environmental Assessment. Appendix 1 signposts the requirements of Article 5(1) of the European Union Directive 2001/42/EC that are being met in this document, and where they were met in previous SA reports.

3.14 The objective is SEA as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'*.

### **3.4 European Habitats Directive**

3.15 Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan (such as the core strategy) against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.

3.16 The Council has carried out this assessment which concludes that no options have been found to have a likely significant effect on any designated European sites. The AA is contained as Appendix 2 to this report.

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<sup>4</sup> The Countryside Agency and English Nature have since amalgamated to form English Nature

## **4. What was appraised?**

- 4.1 For the purpose of appraising the Core Strategy Options Report, and in accordance with the SA good practice guidance, it has been necessary to perform the following tasks:
- appraise the Strategic Objectives
  - appraise the Strategic Spatial Options
  - appraise the Policy Options.
- 4.2 The SA does not seek to pre-judge the approach which the Core Strategy should adopt. The role of the SA is to
- assist with the identification of the appropriate approach - in sustainability terms
  - predict implications for sustainable development and
  - put forward recommendations for improvement where necessary.
- 4.3 The Council is not required to pursue the options recommended from this process. For example, there may be specific local circumstances that justify choosing an option that does not perform as well as others when appraised against the SA framework. If such instances arise, close attention should be paid to implementing mitigation measures recommended from the appraisal matrix.

## 5. The baseline and context

### 5.1 Links to other policies, plans and programmes

5.1 The first phase of the SA process involves identifying policies, plans, programmes and initiatives that could be of relevance to the SA process and assessments of plans and guidance documents. This ranges from the international, national, regional to the local level.

5.2 This exercise was carried out as a part of the scoping report (see par. 3.6) and has been updated for this report. It can be found at:

<http://www.lewisham.gov.uk/NR/rdonlyres/F1C0BAF1-F44E-4EB4-B01E-BA09CF4D02CC/0/SpatialCoreStrategySAReporAppendixA.pdf>

### 5.2 Lewisham today

5.3 The following provides a description of the social, environmental and economic baseline for the London Borough of Lewisham, and will inform the review of the SA objectives that will be used to appraise the Core Strategy Options Report.

#### **An outline of the borough**

5.4 The London Borough of Lewisham comprises an area of approximately 14 square miles and is located south east of central London stretching in the north from the River Thames at Deptford to the southern suburban areas of Sydenham, Downham and Grove Park. Adjoined by four other London boroughs<sup>5</sup>, it occupies a key position on important transport routes (radial and orbital) within London and between London, Kent and Sussex. These transport routes connect the borough to the rest of London, including the significant employment centres of the City of London and Canary Wharf, the leisure and retail destinations of the West End, Croydon and Bromley, as well as the key sites for the 2012 Olympics. Proposals for new and upgraded transport infrastructure will further enhance these connections.

5.5 Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area<sup>6</sup> stretching east to the Kent and Essex coasts along the Thames Estuary. Lewisham, Catford, New Cross and the Deptford Creek area are also identified as opportunity areas in the London Plan<sup>7</sup> and are expected to be able to accommodate substantial new jobs and / or homes. The borough also contains two strategic employment locations (Bromley Road and Surrey Canal Road) identified in the London Plan<sup>8</sup> and the London Plan requires that the borough provide 975 new homes per year up to 2016<sup>9</sup>.

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<sup>5</sup> The London Borough's of Greenwich, Southwark, Bromley and Tower Hamlets (across the River Thames)

<sup>6</sup> As designated in the Sustainable Communities Plan (Sustainable Communities: Building for the future 2003)

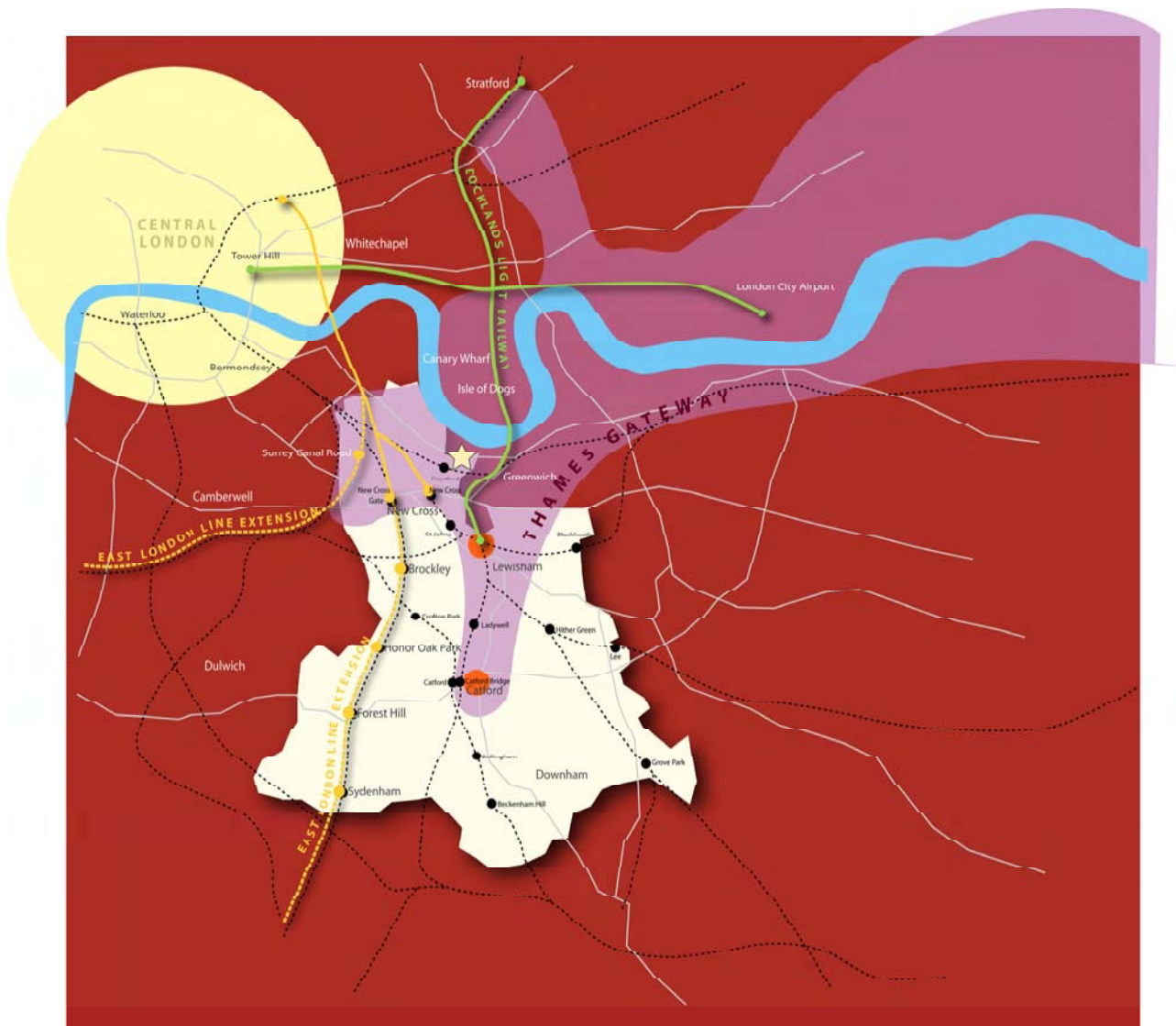
<sup>7</sup> Policy 2A.5

<sup>8</sup> London Plan Policy 3B.4 and Annex 2

<sup>9</sup> London Plan Policy 3A.2

- 5.6 Home to approximately 258,000<sup>10</sup> people and 113,000<sup>11</sup> dwellings, the borough is primarily residential in nature, ranging from low density suburbs to high density neighbourhoods. These extensive areas of housing are punctuated with a network of activity centres, employment areas of varying quality and job density, green spaces, conservation areas and transport infrastructure.
- 5.7 There are 26 conservation areas covering approximately 654 ha and 516 listed buildings. The borough falls within the catchment of the River Ravensbourne and its tributaries, along which are located many of the borough's significant areas of green space. Some parts of the borough fall within an area of flood risk although importantly most of the borough is protected by flood defences, including the Thames Barrier.

London Borough of Lewisham within its wider strategic context

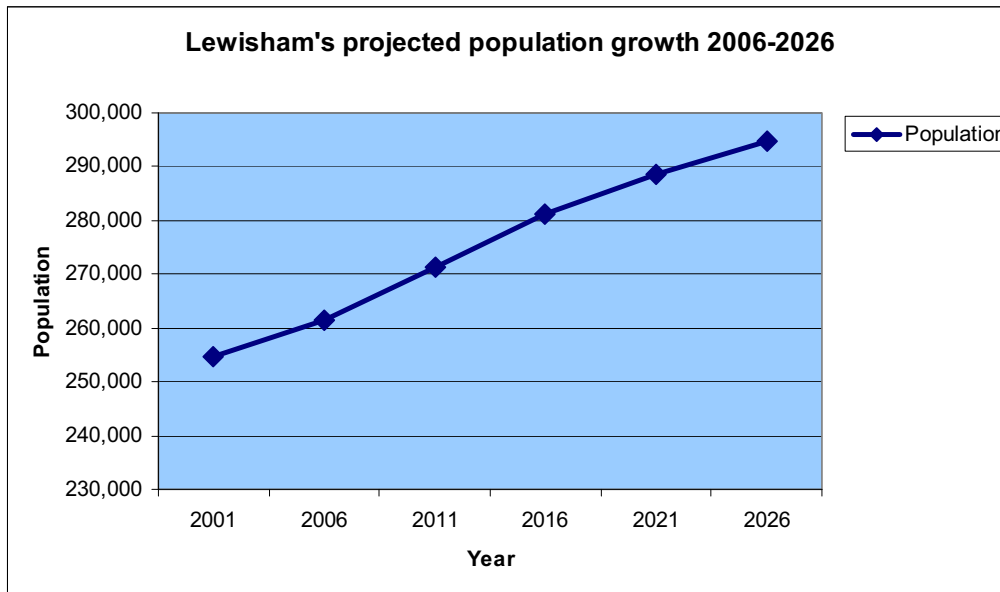


<sup>10</sup> As estimated by ONS 2007, Mid Year population estimate published 21 August 2008

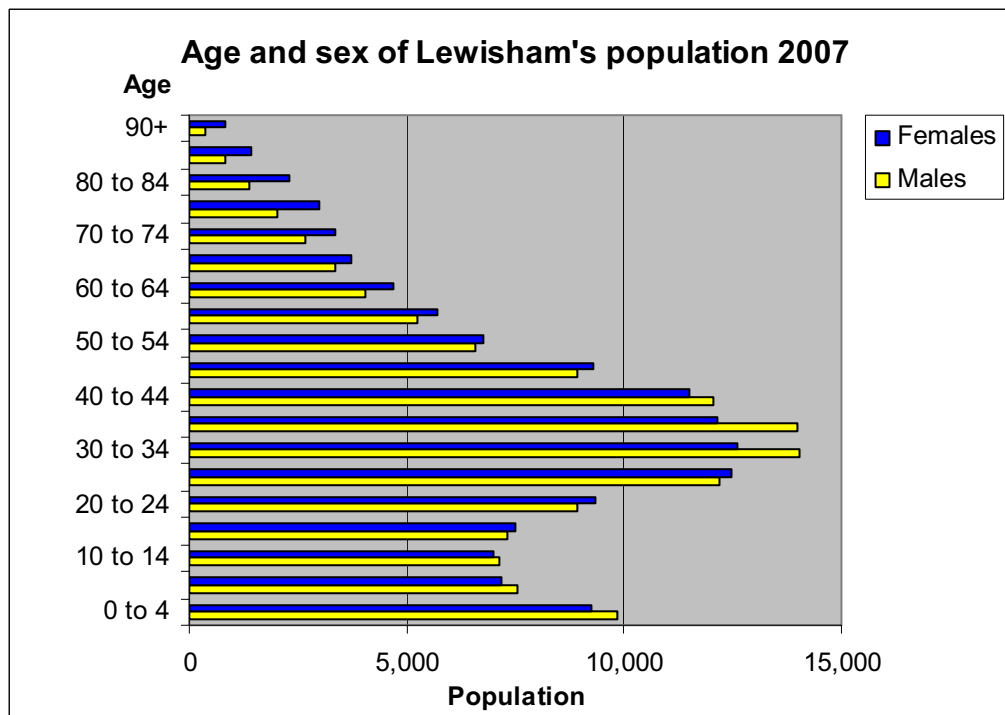
<sup>11</sup> 113,041 - Dwelling stock by tenure condition, Period: April 2006, Neighbourhood Statistics, ONS updated on 26 March 2008

## People

- 5.8 The population is expected to increase by approximately 25,000 people up to 2016<sup>12</sup>. This would represent a 10% rise in 10 years.



- 5.9 Children and young people (0-19 years) make up 25% of the population<sup>13</sup>, of one the highest proportions in London. Elderly residents (over 75 years) make up just 5%. The average age of the population is 34.7 years and is young when compared to other London boroughs.

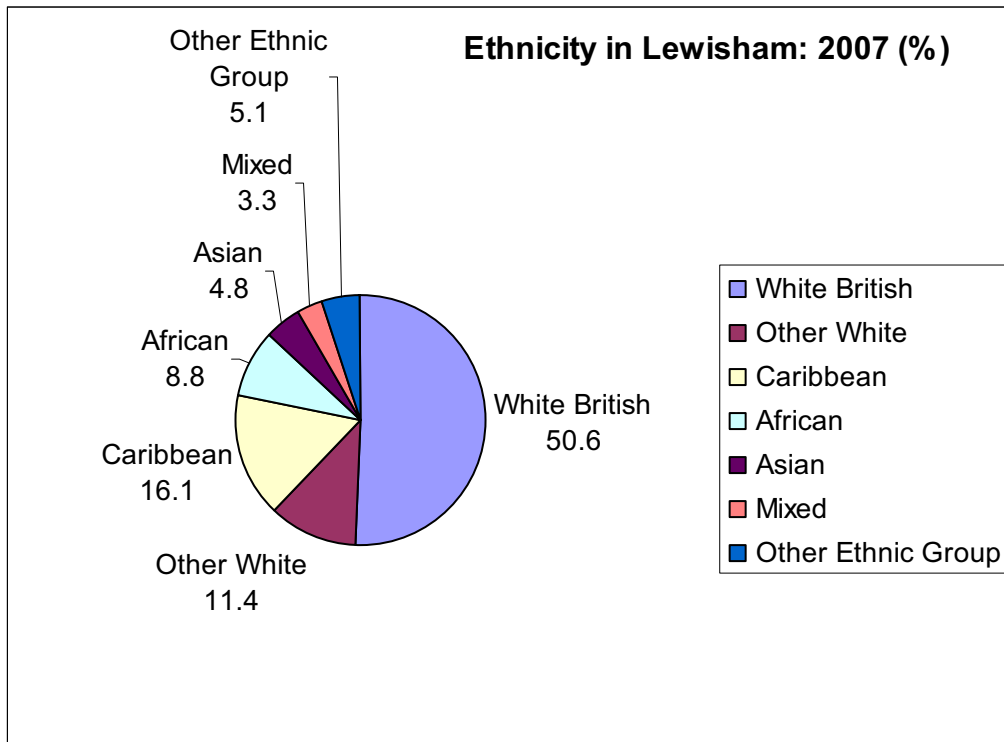


<sup>12</sup> According to the 2007 Mid Year Estimates prepared by the Greater London Authority, Lewisham's population could be 279,600 compared to 257,000 estimated in 2005

<sup>13</sup> According to the 2007 Mid Year Estimates prepared by the Greater London Authority, Lewisham's population could be 279,600 compared to 257,000 estimated in 2005

5.10 Between 2001 and 2005 Lewisham had a net loss of over 8,000 young people under due to migration to the rest of England and Wales. This is the equivalent of over 3% of the entire population of the borough<sup>14</sup>.

5.11 There has been a growth in all groups of the black and minority ethnic (BME) population from 39% of households<sup>15</sup> to nearly half (49.4%) of all households in 2007<sup>16</sup> who largely live in the northern and central parts of the borough.



5.12 The average life expectancy of Lewisham residents is 76 years. This compares to 78.3 years for London and 78.1 years for Great Britain<sup>17</sup>.

5.13 Lewisham is considered to be the 39th most deprived local authority area in England with pockets of deprivation in most areas but significantly concentrated in the southern wards of Bellingham, Rushey Green, Downham and Whitefoot, the northern wards of Evelyn, New Cross, Telegraph Hill and parts of Brockley, and Lewisham Central.

<sup>14</sup> ONS Migration Statistics

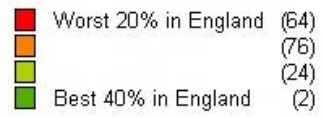
<sup>15</sup> Census 2001

<sup>16</sup> Lewisham Strategic Market Housing Assessment

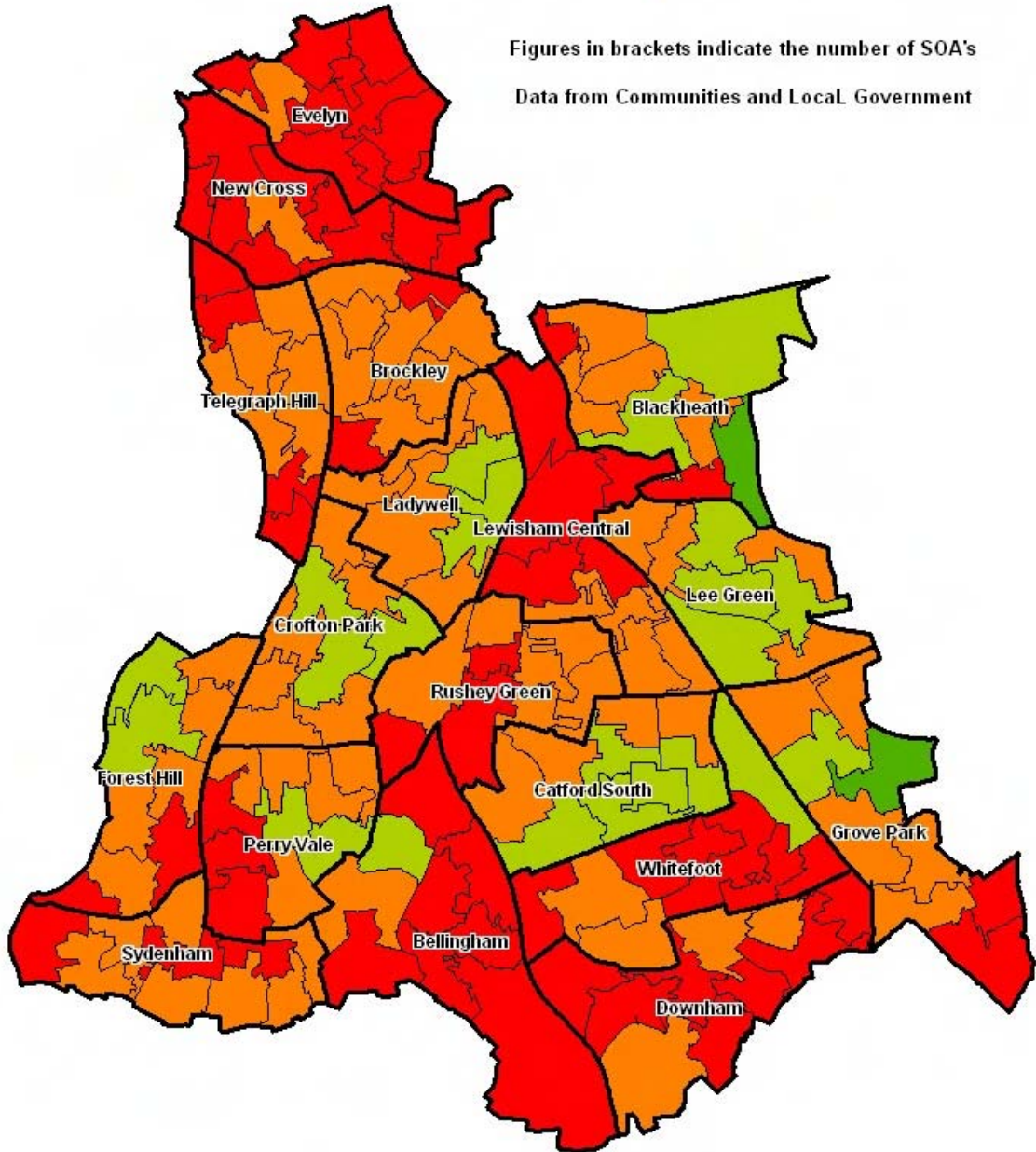
<sup>17</sup> Census 2001



### Index of Multiple Deprivation 2007 Overall Index Score



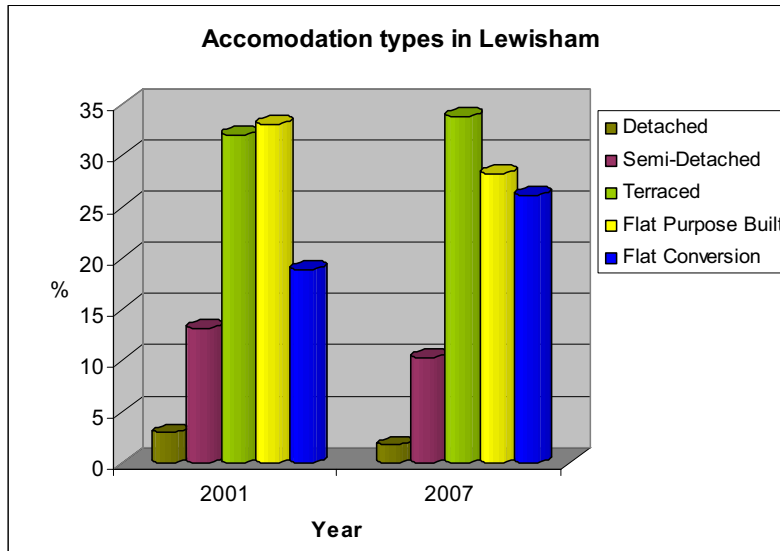
Figures in brackets indicate the number of SOA's  
Data from Communities and Local Government



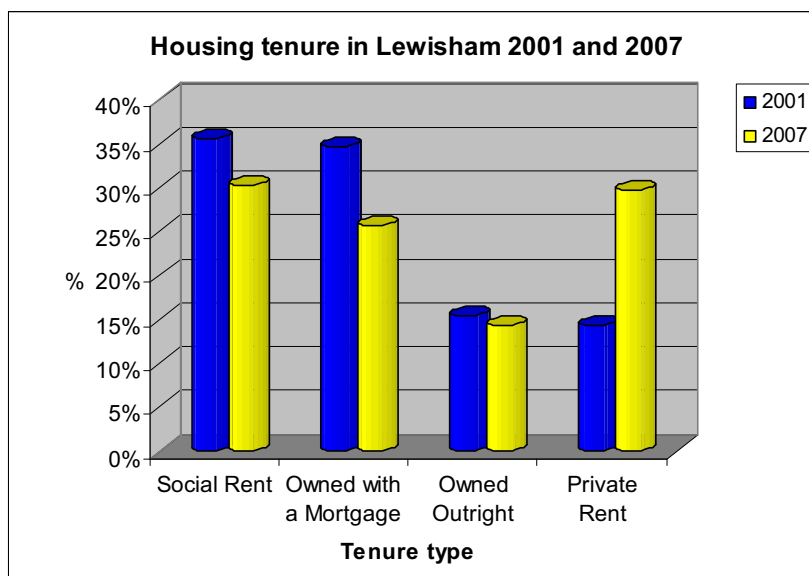
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## Homes

- 5.14 Of the total dwelling stock, 54% of properties in Lewisham are flats of which nearly half are converted dwellings rather than purpose built. Of the remainder 34% are terraced houses and 12% are detached or semi-detached<sup>18</sup>.



- 5.15 In terms of bedroom size, 27% of properties are 1 bedroom, 33% 2 bedroom and 30% 3 bedroom. This leaves 10% with 4 or more bedrooms<sup>19</sup>.
- 5.16 A dramatic change has taken place in the tenure of property in the London borough of Lewisham in the past few years. The amount of private rented properties have increased from 14.3% in 2001 to 29.8% in 2007. Conversely social rented properties have fallen from 35.6% in 2001 to 30.2% in 2007, while properties owned outright or with a mortgage have decreased from 50% in 2001 to 40% in 2007<sup>20</sup>.



<sup>18</sup> Lewisham Household Survey 2007, SHMA 2008

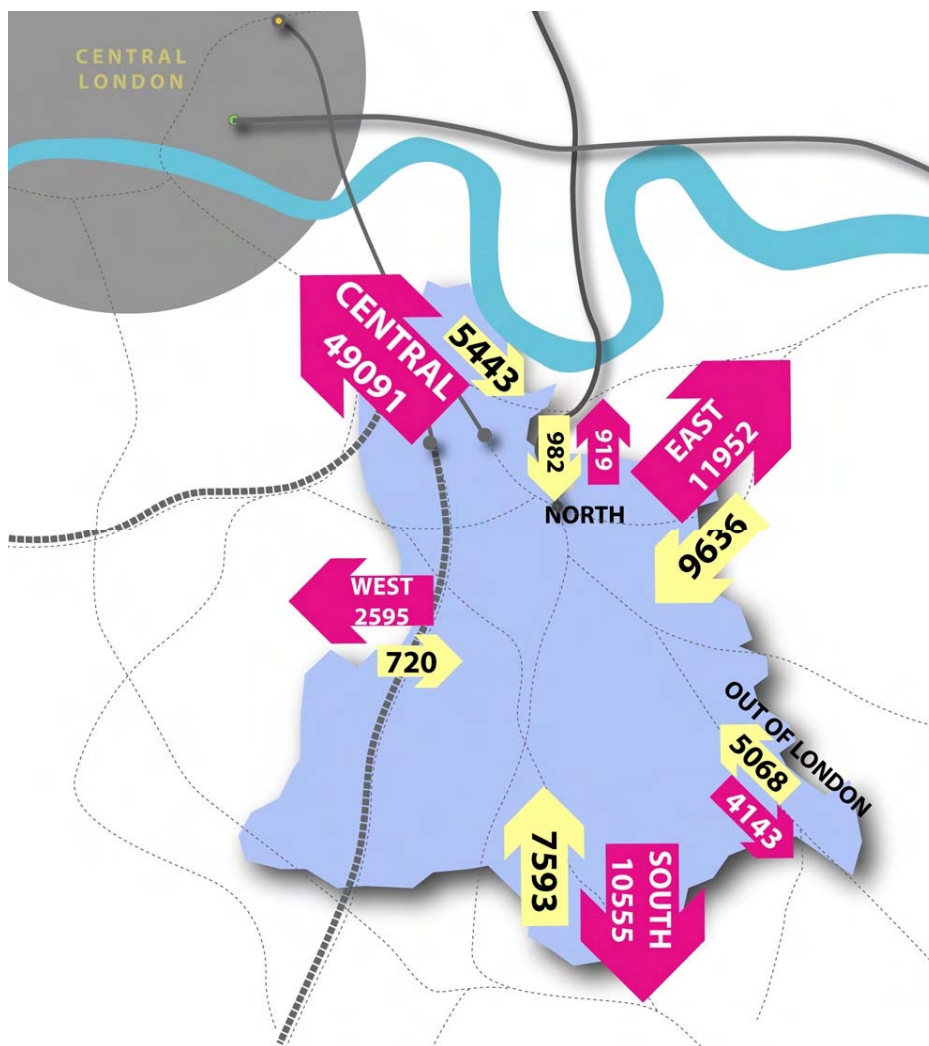
<sup>19</sup> Lewisham Household Survey 2007, SHMA 2008

<sup>20</sup> Lewisham Household Survey 2007, SHMA 2008

- 5.17 A total of 33,922 households<sup>21</sup> were assessed as living in unsuitable housing due to one or more factors. The largest reason was overcrowding (11,482 households), and major disrepair or unfitness (10,641); followed by support needs, accommodation too expensive and sharing facilities (6,151, 5,263, and 4,487 respectively).
- 5.18 Deptford, Lewisham Town Centre and Bellingham are the areas in the borough most likely to contain unsuitably housed households<sup>22</sup> which corresponds to areas identified with higher levels of deprivation.

### Jobs

- 5.19 Despite being the third most populous inner London borough, Lewisham's underlying economy is one of the smallest in London, ranking 30th out of 33<sup>23</sup>. The borough workforce numbered around 66,000 in 2006 – a rise of 8% since 1998<sup>24</sup>. This is in line with regional and national averages, but below the sub-regional average. The majority of Lewisham's population travel outside the borough to work.



<sup>21</sup> Lewisham Household Survey 2007, SHMA 2008  
<sup>22</sup> Lewisham Household Survey 2007, SHMA 2008  
<sup>23</sup> Lewisham Economic Development Business Plan 2004  
<sup>24</sup> Lewisham Employment Lands Study 2008 (ELS)

- 5.20 Town centres are key locations of economic activity and employment in the borough. The largest employer is the Public, Education and Health Services sector, with 38% (22,807) of jobs in 2006<sup>25</sup>. Distribution, Hotels and Restaurants (mostly retail), and the Banking and Finance sectors are the next largest employment sector with 22% each (12,800) employees. The broad employment categories are expected given Lewisham's place in recent times as a London residential borough.
- 5.21 The borough lost nearly a third of its already fragile industrial base between 2000 and 2004, whilst the stock of commercial property has decreased in recent times. Commercial and industrial stock shrunk by 8.7% between 1985 and 2003<sup>26</sup>.
- 5.22 The overall employment figure for Lewisham, including those working in and out of the borough, was 132,700 at December 2005, with an increase of approximately 2,700 between 2000 and 2005. Only 31% of the resident population are employed in the borough<sup>27</sup>.
- 5.23 There is a strong recognition of the importance of creative industries to the borough's economy, with these activities currently clustered in parts of Deptford, New Cross and Forest Hill.
- 5.24 The borough has particular advantages for business such as good public transport communication, and a good representation in a number of growing sectors. Working residents show some signs of well being, with high economic activity levels and nearly a third of residents are qualified to a degree level or beyond<sup>28</sup>.
- 5.25 However, Lewisham has a number of disadvantages. There are limited local employment opportunities and a small number of businesses for a borough of its size. Consequently, only a small proportion of Lewisham's working residents actually work in the borough. Lewisham's economy, by London terms, is fairly deficient of high value/knowledge based sectors, and generally there is a greater dependency on non B-space employment. Many of the local jobs can be considered relatively low value in output which reflects the relatively low wage levels. The over-reliance on the public sector may also limit opportunities for enterprise driven by the private sector<sup>29</sup>.

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<sup>25</sup> Chapter 3, ELS

<sup>26</sup> ELS

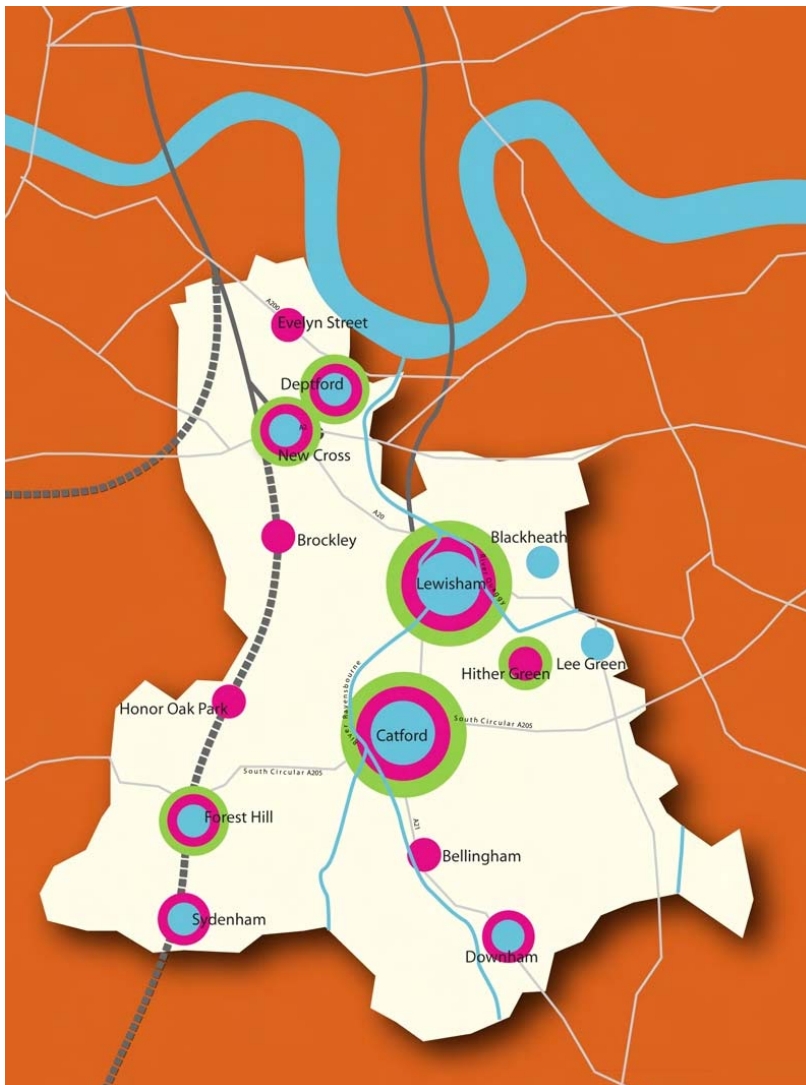
<sup>27</sup> LB Lewisham Economic Development

<sup>28</sup> Chapter 3, ELS

<sup>29</sup> Chapter 3, ELS

## Town Centres

5.26 The borough has two major town centres in Lewisham and Catford offering a wide range of retail, commercial and entertainment services. Supporting the major centres are a network of seven district town centres<sup>30</sup>, two out-of-centre retail parks<sup>31</sup> and five neighbourhood centres<sup>32</sup>.



5.27 As the larger of the two major town centres, Lewisham has a total floorspace of approximately 79,245 square metres gross, with 317 units within its boundary<sup>33</sup>. Convenience and comparison retailers are closely aligned to the national average, while the service sector is slightly higher<sup>34</sup>.

<sup>30</sup> Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross, Sydenham

<sup>31</sup> Bell Green and Bromley Road/Ravensbourne Retail Park

<sup>32</sup> Brockley Cross, Crofton Park, Downham Way, Grove Park, Lewisham Way

<sup>33</sup> GOAD 2003

<sup>34</sup> Convenience retailing represents 9.5% as compared to 9.3% nationally, comparison retailing represents 47.6% compared to 48.1% and the service sector comprises 34.1% compared to 30.7%, GOAD 2003, updated by Nathaniel Litchfield and Partners 2004

- 5.28 Catford, the smaller of the two major town centres, has a total floorspace of around 47,470 square metres gross within 148 units. The centre is well below the national average for convenience and comparison retailing and there is a strong desire to see an improvement in the retail mix<sup>35</sup>.
- 5.29 Major centres located just beyond the boundaries of the borough likely to have an impact on Lewisham's retail centres include Canary Wharf, London's West End, Canada Water/Surrey Quays, Croydon, Bromley and Bluewater (Kent) and the forthcoming developments in Stratford City.
- 5.30 The Council's Retail Capacity Assessment<sup>36</sup> indicates there is sufficient spending capacity within the borough to support the expansion of some centres and for Lewisham Town Centre to achieve metropolitan status.

### **Environment**

- 5.31 A continued contribution must be made to managing and adapting to climate change. A large part of this effort involves the following measures.

#### *Flood risk*

- 5.32 The northern proportion of the borough is situated immediately adjacent to the River Thames for approximately one kilometre. The River Ravensbourne and River Quaggy are also key features of the borough. At least one-fifth of all residential and non-residential properties in the borough are at some risk of flooding<sup>37</sup> from these sources. Whilst the Thames poses a potential risk of flooding to properties within this area of river frontage, properties are currently protected from flooding by the River Thames Tidal Defences up to the 1 in 1,000 year event.
- 5.33 Properties within the vicinity of the River Ravensbourne or the River Quaggy corridors are subject to a potential risk of fluvial (river) flooding. Investment has been placed into flood defence to reduce the risk of flooding, particularly within Lewisham town centre, however fluvial flooding remains a threat to property (and potentially life) within the borough<sup>38</sup>.
- 5.34 A potential risk of flooding from other (non river related) sources exists including possible sewer surcharging and surface water flooding as a result of heavy rainfall and/or blocked gullies. With changing climate patterns, it is expected that intense storms will become increasingly common and those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years<sup>39</sup>.

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<sup>35</sup> 17.6% of convenience units against the national average of 9.3%, comparison units represent 29.1% compared to 48.1% nationally GOAD 2003, Nathaniel Litchfield and Partners 2004

<sup>36</sup> Nathaniel Litchfield 2004 and 2006 update

<sup>37</sup> Strategic Flood Risk Assessment, 2008 (SFRA)

<sup>38</sup> SFRA

<sup>39</sup> SFRA



## *Waste*

- 5.35 Every borough is allocated an apportionment of waste in the London Plan that they must dispose of using appropriate facilities. For Lewisham this equates to approximately 208,000 tonnes in 2010, increasing to 323,000 tonnes by 2020<sup>40</sup>. Provision in the borough exceeds this level by some distance with the South East London Combined Heat and Power Station (SELCHP) in Deptford using 420,000 tonnes alone. Further facilities in Lewisham are capable of dealing with over 200,000 tonnes and provide support to other boroughs in the South East Region of London<sup>41</sup>.
- 5.36 Of the borough's total waste for 2007/8 only 10% is sent to landfill. In terms of household waste the borough recycles and composts 22% and incinerates 73%. Lewisham has set itself stretching recycling / composting targets and in 2010/11 has set a target to recycle, compost or reuse 25% of its household waste. Further, targets have been set to landfill 8% of municipal waste by 2010/11 and to reduce household waste per household to 716kg in 2010/11<sup>42</sup>.

## *Local air quality*

- 5.37 There are five air quality management areas (AQMAS) in the borough, located where the level of pollutants is higher than the acceptable threshold.
- 5.38 Road traffic is the main source of air pollution in the borough. Excessive road traffic, which affects areas of poor air quality, is considered to be one of the main modern 'environmental stress' factors.
- 5.39 The Council's third review and assessment (Updating and Screening Assessment) of air quality was conducted in July 2006. There is a risk of the annual mean objective being exceeded for nitrogen dioxide and for particles PM10. The Detailed Assessment concluded that the Council should maintain the designated AQMAS, continue the programme of monitoring and consider an expansion of the current monitoring stations to locations where fugitive sources are known to be an issue<sup>43</sup>.
- 5.40 The Council adopted an Air Quality Action Plan in 2008. The focus of which is mainly concerned with reducing emissions from road transport, with an emphasis on balancing supply side measures, such as improved walking, cycling and public transport, and demand side management, such as traffic restraint and regulation. The implementation of the London Low Emission Zone is expected to have the highest benefit in improving air quality within Lewisham AQMAS.
- 5.41 The borough's air quality will remain an important issue that needs to be addressed and can be linked to the type of development taking place and its location, the way people travel, restraining car use, and focusing people in areas where a full range of facilities are at their doorstep.

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<sup>40</sup> London Plan policy 4A.25 and Table 4A.6

<sup>41</sup> Southeast London Boroughs' Joint Waste Apportionment Technical Paper, 2008

<sup>42</sup> Lewisham Draft Municipal Waste Strategy 2006

<sup>43</sup> Air Quality Action Plan 2008



## Community and infrastructure

- 5.42 Over 40%<sup>44</sup> of households do not own a car, ranging from 55.8% in the north of the borough in New Cross to 32.8% in the south in Grove Park<sup>45</sup>. Over half<sup>46</sup> of journeys to work are taken by public transport. Like most of London, traffic congestion is increasing on the local road network.
- 5.43 Lewisham has 69 primary schools and 11 secondary schools. There is currently a shortage of secondary school places in the borough leading to many students attending schools in the boroughs of Bromley and Greenwich. The Building Schools for the Future (BSF) Programme will see every secondary school in the borough being either rebuilt or refurbished in the next decade and the Council has been awarded £186 million. A further £1450 per secondary school pupil has also been secured for investment in ICT.
- 5.44 Further education facilities are provided on two campuses by Lewisham College at Brockley and Deptford. While Goldsmiths College (University of London) at its New Cross campus provides higher education facilities with a focus on creativity, culture and digital technologies.
- 5.45 The borough has 162 GPs distributed through a network of 42 practices, six primary care centres and 1 one-stop primary care centre. In addition the borough benefits from the many facilities available at University Hospital Lewisham.
- 5.46 In 2005, the Lewisham Primary Care Trust produced the Lewisham Health Profile, which showed that premature mortality (under 75) is 25% higher than nationally. The main contributors to this are cancers, coronary heart disease, hypertension and stroke. The infant mortality rate is also higher than the national average.
- 5.47 In supporting the community, Lewisham has 49 community centres, 12 libraries, 8 leisure locations with swimming pools and 44 with sports halls, as well as 104 grass sports pitches and 100 children's play areas<sup>47</sup>.
- 5.48 Lewisham has generally had lower levels of crime than most of the other inner-London boroughs<sup>48</sup>, although the fear of crime is a key issue<sup>49</sup>.

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<sup>44</sup> 42.8%, Census 2001

<sup>45</sup> Census 2001

<sup>46</sup> 51.2%, Census 2001

<sup>47</sup> Lewisham Social Infrastructure Assessment 2008

<sup>48</sup> Metropolitan Police

<sup>49</sup> Residents Survey 2007

## 6. Main social, environmental and economic issues identified

### 6.1 Key issues

In reviewing the key characteristics of 'Lewisham Today' the main social, environmental and economic issues facing the borough can be identified. The key issues are shown in Table 6.1 and have been used to formulate the SA objectives.

**Table 6.1 The main social, environmental and economic issues facing the borough**

Key issues	Source
<b>Economic</b>	
<p><b>Limited employment opportunities outside of public sector</b></p> <p><b>High commuter population working outside of Lewisham</b></p> <p>Need to create employment and training opportunities in the borough to create a more sustainable environment and enhance the local economy</p>	<ul style="list-style-type: none"> <li>• Lewisham Employment Land Study 2008 (Roger Tym &amp; Partners)</li> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• People, Prosperity, Place, Lewisham Regeneration Strategy 2008-2020</li> <li>• Lewisham Economic Development Business Plan 2004 (Ancer spa)</li> <li>• Local Futures: The State of the Borough 2004</li> <li>• Lewisham Local Cultural Strategy 2002</li> </ul>
<p><b>Varied levels of growth in local shopping areas</b></p> <p>With predicted population growth there is a need for enhancing the vitality of the local shopping areas to improve the local economy and hence provide a more sustainable community</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Lewisham Retail Capacity Assessment 2004</li> <li>• Bell Green Proof of Evidence Retail Capacity Update 2006</li> <li>• Lewisham Town Centre Health Check Report 2007/8</li> <li>• London-wide Town Centre Health Checks Analysis 2006</li> <li>• Town Centre Management Strategy 2007-2010 Best Practice Guidance Managing the Night Time Economy 2007</li> </ul>
<p><b>Provision of adequate employment land to support business enterprise</b></p> <p>sufficient employment land will need protection and new land sought to improve the overall economy of the borough</p>	<ul style="list-style-type: none"> <li>• Lewisham Economic Development Business Plan 2004 (Ancer Spa)</li> <li>• Lewisham Employment Land Study 2008 (Roger Tym &amp; Partners)</li> <li>• Lewisham Local Cultural Strategy 2002</li> <li>• Local Futures: The State of the Borough 2004</li> </ul>

Key issues	Source
<p><b>Finding a balance between meeting housing targets and maintaining economic and cultural vitality of the borough</b></p> <p>A general conflict between meeting housing targets and protecting sites for other uses such as employment, retail, education, health, community in a built up environment</p>	<ul style="list-style-type: none"> <li>• Lewisham Employment Land Study 2008 (Roger Tym &amp; Partners)</li> <li>• Strategic Housing Market Assessment 2008</li> <li>• Lewisham Economic Development Business Plan 2004 (Ancer Spa)</li> </ul>
<b>Environmental</b>	
<p><b>Protect and improve biodiversity and natural habitats</b></p> <p>Brownfield sites are important habitat for local species. Species such as the stag beetle and black red start are local to this area and need to be protected.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Lewisham Open Spaces Strategy 2004</li> <li>• Lewisham (A natural renaissance for Lewisham) Biodiversity Action Plan 2006</li> <li>• Thames Strategy East 2008</li> <li>• Green Chain Policy Document 1977</li> </ul>
<p><b>CO2 emissions contributing to climate change</b></p> <p>Climatic changes due to greenhouse gas emissions are likely to affect the natural environment and with that the built environment will have to adapt to these changes and find ways of mitigating the effects.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Carbon Reduction and Climate Change Strategy 2008</li> <li>• Lewisham Energy Strategy</li> <li>• Air Quality Action Plan 2008</li> <li>• Strategic Flood Risk Assessment 2008 Sequential Test 2008</li> <li>• Local Implementation (Transport) Plan 2006</li> </ul>
<p><b>Traffic congestion and car dependence</b></p> <p>A growing population will increase movement across the borough, which will put pressure on the road network and existing public transportation. There is a need to locate development in the vicinity of existing transport links and improving walking and cycling routes and public transport.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Stratgy 2008-2020</li> <li>• Local Implementation (Transport) Plan 2006</li> <li>• North Lewisham Links Strategy 2007</li> <li>• Waterlink Way</li> <li>• Ravensbourne River Corridor Improvement Plan 2008</li> </ul>

Key issues	Source
<p><b>High levels of air and noise pollution due to traffic</b></p> <p>Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham’s Sustainable Community Strategy 2008-2020</li> <li>• Air Quality Action Plan 2008</li> <li>• Local Implementation (Transport) Plan 2006</li> <li>• Health Issues in Planning, Best Practice Guidance 2007</li> <li>• Transport 2025, Transport vision for a growing world city, November 2006</li> </ul>
<p><b>Protect cultural heritage from redevelopment</b></p> <p>Lewisham has two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings. The borough has its own architectural identity and character and the best part should be preserved.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham’s Sustainable Community Strategy 2008-2020</li> <li>• Deptford/New Cross Masterplan 2007</li> <li>• People, Prosperity, Place; Lewisham Regeneration Strategy 2008-2020</li> <li>• Lewisham Local Cultural Strategy 2002</li> <li>• Lewisham Conservation Area Appraisals and Management Plans</li> <li>• Lewisham Local List (under Revision)</li> <li>• Listed Buildings</li> <li>• Lewisham UDP Schedules 1A, 3 and 5</li> <li>• Thames Strategy East 2008</li> </ul>
<p><b>North Lewisham and the areas around the river network are within the Flood Risk 3a (high probability) category</b></p> <p>Climate change is predicted to increase adverse weather patterns, leading to more intense and severe flooding in flood risk areas.</p> <p>There is a need to implement mitigation and adaptation measures to reduce the occurrence and impact of flooding.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham’s Sustainable Community Strategy 2008-2020</li> <li>• Lewisham Strategic Flood Risk Assessment, 2008</li> <li>• Sequential Test 2008</li> <li>• Ravensbourne River Corridor Improvement Plan (draft)</li> <li>• Lewisham Open Spaces Strategy 2004</li> </ul>
<p><b>Aging housing stock and poor levels of insulation</b></p> <p>The housing stock will require updating (13.8% of residents are living in unsuitable housing) with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings (current SAP rating are 46 out of 100).</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham’s Sustainable Community Strategy 2008-2020</li> <li>• Strategic Housing Market Assessment 2008</li> <li>• Lewisham Private Sector Housing Strategy</li> <li>• Lewisham Energy Strategy</li> </ul>

Key issues	Source
<p><b>Low levels of recycling and requirements for reducing total waste production</b></p> <p>There is a need to reduce waste generation and improve recycling rates. Final disposal of waste is a problem due to lack of land for such a low value use and negative public opinion of living in the vicinity of such facilities. With requirements for managing our waste within the borough boundaries and proposals for waste allocated to Lewisham from inner city boroughs this issue will become increasingly important.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• South East London Boroughs' Joint Waste Apportionment Technical Paper</li> <li>• Lewisham (Draft) Waste Management Strategy 2008</li> </ul>
<b>Social</b>	
<p><b>High demand for housing, house prices and continuous growth in population.</b></p> <p>The population is forecasted to rise. The Mayor of London requires 9,750 new residential units to be built in Lewisham by 2017. The average income of the majority of households is insufficient to buy a house.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Strategic Housing Market Assessment 2008</li> <li>• Strategic Land Availability Assessment 2008</li> <li>• Housing Strategy (draft)</li> <li>• Children and Young Peoples Plan</li> </ul>
<p><b>Improved access to health care, education and community facilities</b></p> <p>Ensure that improved and accessible health, education and community facilities are provided to accommodate the needs arising from new developments and meeting existing needs.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Lewisham Social Inclusion Strategy 2005</li> <li>• Lewisham PCT Estate Strategy</li> <li>• Lewisham PCT Commissioning Strategy 2008-2012</li> <li>• Local Education Authority School Plan</li> <li>• Lewisham Social Infrastructure Framework 2008</li> <li>• Lewisham Physical Activity, Sport and Leisure Strategy 2006</li> <li>• Lewisham School Sports Facility Strategy 2006</li> </ul>
<p><b>Low levels of educational attainment</b></p> <p>There is a need for improving the educational attainment of students in primary and secondary schools.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Local Education Authority School Plan</li> <li>• Lewisham School Sports Facility Strategy 2006</li> </ul>

Key issues	Source
<p><b>General perception of high crime rates in Lewisham</b></p> <p>Though Lewisham has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment with adequate natural surveillance.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Lewisham Social Inclusion Strategy 2005</li> <li>• Lewisham Local Cultural Strategy 2002</li> </ul>
<p><b>Addressing deprivation and social exclusion</b></p> <p>Lewisham has a number of severely deprived areas. Fourteen of Lewisham wards have part of their area in the 20% most deprived wards in England.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Indices of Multiple Deprivation 2007</li> </ul>
<p><b>Provision of open space and recreational facilities</b></p> <p>With future growth in the housing sector the proportion of open space per 1000 population will be reduced.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Lewisham Open Space Strategy 2004</li> <li>• Lewisham Physical Activity, Sport and Leisure Strategy 2006</li> <li>• Green Chain Policy Document 1977</li> </ul>

## 6.2 Statement of the likely significant effects without implementation of the plan

Without the implementation of the Core Strategy Options Report, the following impacts are likely:

### Socio-Economic

- Opportunities to boost Lewisham's local economy by promoting and improving upon the existing local employment offer will be lost.
- Lewisham is unlikely to meet housing needs for future residents, which includes the London Plan target of 975 dwellings per annum during the period 2006/07 to 2016/17.
- Improvements to areas with high levels of deprivation such as Deptford and New Cross will not be achieved.
- Opportunities to provide necessary infrastructure facilities, including health educational, sports and recreational, may not come forward.
- Improvements to the existing river frontages and waterways is unlikely to take place.

## **Environmental**

- Opportunities to promote sustainable design for the new built environment including features like living roofs and walls, energy efficient designs and measures to mitigate the occurrence of flooding etc may not be realised.
- Road traffic will remain the main source of air pollution as the opportunity to promote sustainable modes of transport such as walking and cycling in the borough will be lost.
- Opportunities to seek additional open space to meet the future population demand will be lost.
- Opportunities to improve the existing landscape and townscape will be missed.
- The impact on the existing reserve of natural resources such as water, oil and gas is likely to be positive in the absence of Core Strategy to promote sustainable modes of transport, good design and sustainable construction techniques are likely to outweigh the positive impacts identified in this status- quo scenario.
- Opportunities to promote sufficient number of waste facilities to meet the existing and future demand is likely to be missed. However, there will be less waste if the Core Strategy is not implemented.



## 7. Sustainability appraisal objectives

- 7.1 The sustainability appraisal (SA) is an objective-led approach whereby the potential impacts of a plan (the core strategy) are assessed against a series of sustainability objectives. This provides the methodology for identifying possible conflicts and any relevant mitigation measures and recommendations to improve upon the effects of the plan.
- 7.2 Following a review of the earlier list of SA objectives included as part of Stages A, B and C of the SA process, and a review of the baseline characteristics of the borough as outlined in Sections 5 and 6, the SA objectives have been slightly modified. They now also reflect all the topics listed in the SEA directive and provide a more robust sustainability framework.
- 7.3 The sustainability objectives are grouped into the following three themes.

### **Economic**

1. To encourage sustained economic growth
2. To encourage and promote employment and new enterprises in Lewisham

### **Environmental**

3. To minimise the production of waste and increase waste recovery and recycling
4. To ensure the efficient use of natural resources
5. To maintain and enhance open space, biodiversity, flora and fauna
6. To improve air quality and reduce noise and vibration
7. To reduce car travel and improve accessibility by sustainable modes of transport
8. To mitigate, and adapt to the impact of climate change
9. To minimise and mitigate flood risk
10. To maintain and enhance landscapes and townscapes
11. To conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough

### **Social**

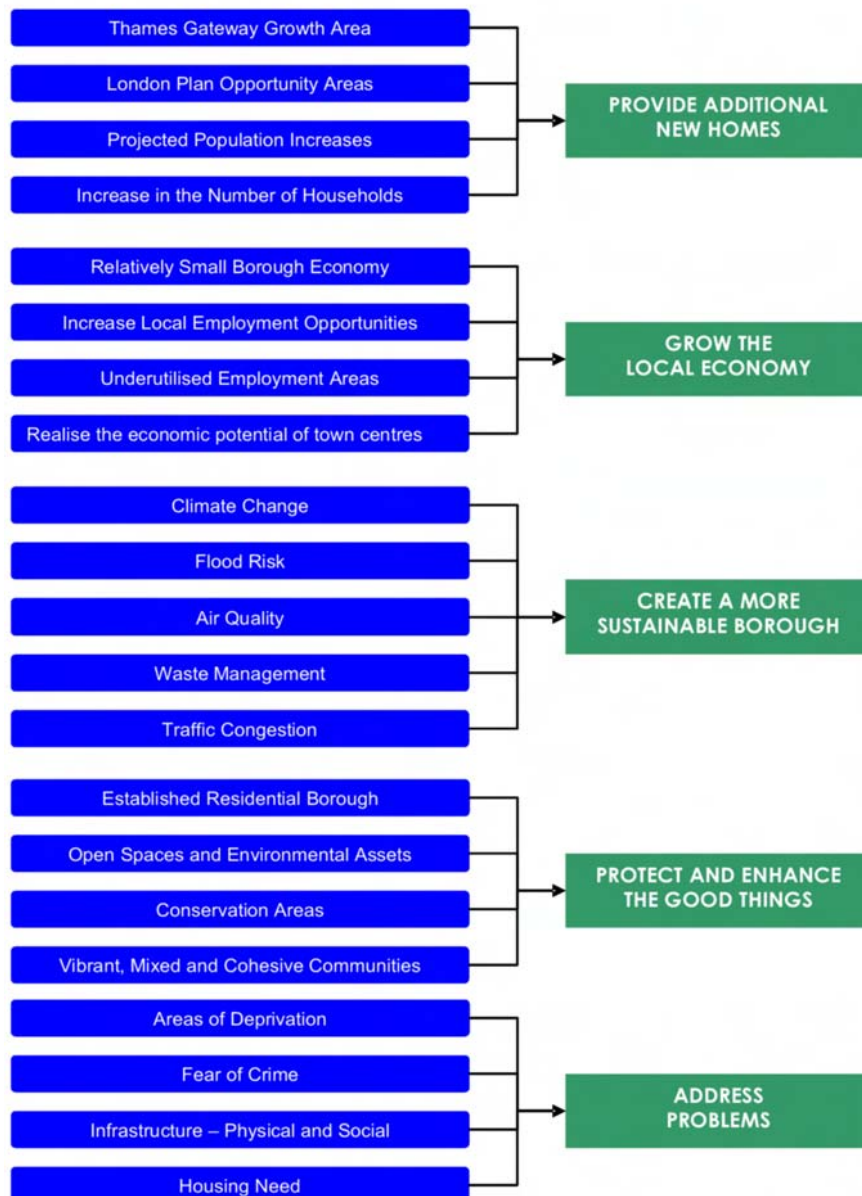
12. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home
  13. To improve the health and wellbeing of the population
  14. To reduce poverty and promote social inclusion
  15. To provide for the improvement of education and skill levels
  16. To reduce crime, anti-social behaviour and the fear of crime
  17. To encourage a sense of community identity and welfare
  18. To improve accessibility to leisure facilities, community infrastructure and key local services
- 7.4 These objectives will be used to appraise the options contained in the Core Strategy Options Report.

## 8. Core Strategy Options Report - outline of contents

- 8.1 The Lewisham Core Strategy Options Report sets out the proposed vision, objectives, strategy and policies that will guide development and regeneration in the London Borough of Lewisham (the borough) over the next 15 years.
- 8.2 The Core strategy is based upon a vision for the type of place the borough will be in 2025, the key drivers of change which impact on the borough now and in the future, and the need to ensure that any change is maximised for the long-term benefit of all in the Lewisham community.

### 8.1 Preparing the core strategy

- 8.3 In preparing options for the Core Strategy, a succinct series of key drivers of change were identified and are shown in the diagram on the next page. These closely resemble the issues highlighted in section 6 of this SA.



8.4 Following an analysis of these characteristics a vision for the borough was prepared and is included below.

### **Core Strategy Vision for Lewisham**

In 2025, the regeneration and physical transformation of the London Borough of Lewisham will have played a key part of the success of the Thames Gateway and of London as a world city.

- Successful redevelopment will have transformed Lewisham Town Centre into a metropolitan scale town centre; a destination of exceptional quality, with a bustling urban centre and first class shopping and leisure facilities. Benefiting from sustainable and diverse new residential communities, including Estate renewal at Loampit and Sundermead, Lewisham will include an attractive waterfront environment along the River Ravensbourne and a network of vibrant public parks (including Cornmill Gardens) and streets. Lewisham Town Centre will be a place of choice for people to live, work and spend time.
- Regeneration of key sites in Deptford and New Cross will lead to the transformation of the north of the borough. New development - a mix of jobs and homes and new training opportunities, will have improved the levels of deprivation and contributed to better socio-economic outcomes for the local residents. Deptford and New Cross will be physically connected throughout, and to the rest of the borough and London. The streets, walkways and parks will be of an excellent standard, having taken full advantage of the River Thames and local waterways. Deptford High Street and New Cross Road will be vibrant local shopping areas.
- The Catford Town Centre, home of the Council's services and the civic heart of the borough, will be a lively, attractive town centre focussed around a high quality network of public spaces. Driven by the redevelopment of key opportunity areas including the redevelopment of the Catford Stadium site and the Shopping Centre, Catford will have an improved retail offer and will be home to a diverse residential community.
- Outside of the key areas of physical regeneration, the borough will have further built upon its unique assets, including the preservation of historic areas; the improvement to parks, gardens and open space networks such as the Waterlink Way, South East London Green Chain and the East London Green Grid; improving public transport links; and a network of vibrant major streets connecting and supporting places within and beyond the borough. Vibrant hubs of local activity, centred on the district and local centres of Blackheath, Downham, Forest Hill, Lee Green, Sydenham, Hither Green and Brockley Cross, will anchor residential areas and deliver essential shops and services needed for daily life.
- Deprivation across the borough will be substantially reduced, as people take advantage of the new opportunities for training and employment, and high quality housing. Communities will rely on effective local services and excellent infrastructure for support.
- Lewisham will have capitalised on the many opportunities over the past 15 years. The completion of the East London Line Extension and the Thameslink programme will ensure better connections for the borough to London and beyond. The Building Schools for the Future programme will be complete and all secondary schools will be rebuilt or refurbished contributing to improved educational standards.

In delivering the above, and by drawing on the resources of all in the community and by working together, Lewisham in 2025 will be the best place in London to live, work and learn.

8.4 This led to the development of a set of strategic objectives to reflect the 'drivers of change' and vision. The objectives contained in the Core Strategy Options Report are grouped into five main themes:

1. Regeneration
2. Providing new homes
3. Growing the local economy
4. Environmental management
5. Building a sustainable community

## **1. Regeneration**

### Core Strategy Objective 1: Facilitate development

Use redevelopment opportunities and the delivery of new homes, particularly in Lewisham, Catford, Deptford and New Cross, to secure substantial physical and environmental regeneration of the borough and socio-economic benefits for the wider community. Benefits should be focused on areas where deprivation is concentrated, such as New Cross, Evelyn, Lewisham Central, Whitefoot, Downham and Bellingham.

## **2. Providing new homes**

### Core Strategy Objective 2: Increase in the number of households

Ensure sufficient numbers of high quality and sustainable housing for all residents, to meet and exceed London Plan targets. New homes should meet the needs of the community by providing:

1. a range of accommodation size (including family housing) and
2. an adequate supply of affordable housing.

## **3. Growing the local economy**

### Core Strategy Objective 3: Increase local employment and training opportunities

Facilitate investment and employment resulting in a sustainable year-on-year net increase in the size of Lewisham's economy through:

1. The promotion of development and improved accessibility, meeting the demand of growth sectors and small and medium enterprises
2. The enhancement of District and Local Hubs as retail and service centres, encouraging increased use and employment opportunity and
3. Ensuring that local communities gain access to new employment and training opportunities.

## **4. Environmental management**

### Core Strategy Objective 4: Climate Change

Take action that supports environmental protection and improvement and reduces pollution and improves local air quality, including those necessary to create a low-carbon borough and reduce adverse effects on climate change.

#### Core Strategy Objective 5: Flood risk

Take action to protect and mitigate the borough from the risk of flooding from all sources, including the Thames, Ravensbourne and Quaggy Rivers.

#### Core Strategy Objective 6: Open spaces and environmental assets

Protect and capitalise on the important environmental features of Lewisham such as developing the Green Grid, biodiversity and sites of nature conservation and open spaces, including the Green Chain walk and the Waterlink Way.

#### Core Strategy Objective 7: Waste management

Deliver sustainable waste management by implementing the waste hierarchy of prevent, reuse and recycle, and safeguarding adequate sites to handle the borough's waste and meet apportionment targets.

### **5. Building a sustainable community**

#### Core Strategy Objective 8: Transport

To ensure an accessible, safe, convenient and sustainable transport system for Lewisham, that meets people's access needs, while reducing the need to travel and reliance on the private car, and which:

1. Promotes choice and better health
2. Facilitates sustainable growth, and the key locations for development and regeneration (Lewisham, Catford, Deptford, New Cross) and
3. Improves integration, accessibility and connectivity within the borough and London sub-region, and that specifically:
  - Provides for a system of walking and cycling routes and strong links to the green infrastructure network
  - Improves accessibility in the Evelyn, Whitefoot, Bellingham and Downham Wards and
  - Delivers key infrastructure projects including the East London Line extension, the Thameslink programme, and DLR 3 Car expansion.

#### Core Strategy Objective 9: Safety

Create safer and stronger communities by reducing crime and the fear of crime through innovative design and land use policies.

#### Core Strategy Objective 10: Social infrastructure

Promote the provision of services and facilities such as schools, health, community, sports and recreation facilities, that are accessible to all of Lewisham's diverse residents, to provide independent community living.

#### Core Strategy Objective 11: Protect and enhance Lewisham's character

Protect Lewisham's urban environment and its local character and distinctiveness, through sensitive and beneficial design, in particular those areas requiring managed change such as the borough's 26 conservation areas and listed buildings, yet at the same time creating and improving the regeneration areas of Lewisham, Catford, Deptford and New Cross.

8.5 The core strategy objectives will help deliver a strategy to accommodate regeneration and growth. To implement this strategy, two strategic spatial options have been considered.

### **Strategic Spatial Option 1**

8.6 Option 1 gives effect to the London Thames Gateway growth area and the London Plan Opportunity Area designations by creating a regeneration and growth corridor primarily focussed in the north of the borough on the localities of Catford, Lewisham, Deptford and New Cross.

8.7 This regeneration and growth corridor will capitalise on the public transport accessibility of the area and the need to maximise the use of land through intensification of land uses in town centres and on redesignated employment land. This will focus on housing provision and employment growth sectors and will be used as a catalyst for major regeneration across the borough.

8.8 A further regeneration area would focus on parts of the Whitefoot, Downham and Bellingham wards to improve deprivation levels. Due to the lack of large development sites, regeneration would focus on estate renewal and local socio-economic programmes.

8.9 To achieve wide scale regeneration the Council is seeking to allocate certain land in Deptford and New Cross currently designated as a Strategic Industrial Location (SIL) and a Local Employment Location (LEL) for mixed use development. The sites would be the location of significant numbers of new homes, jobs and training opportunities. However, site redevelopment would need to incorporate employment uses and this would need to be in those sectors where employment growth is forecast<sup>50</sup>.

### **Strategic Spatial Option 2**

8.10 Option 2 proposes a more modest approach to borough-wide regeneration and growth. Option 2 implements national and the London Plan policies where:

- Land to meet strategic housing targets can be identified across the borough
- Lewisham and Catford Town Centres will be the focus for larger retail and mixed use development
- Deptford (including the Creekside Opportunity Area), New Cross and New Cross Gate would be a focus for housing and jobs (albeit at a lower scale than Option1) and
- Existing Strategic Industrial Land and local employment areas would continue to be protected.

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<sup>50</sup> As identified in the Lewisham Employment Lands Study, 2008



# Option 1 - Borough-wide Regeneration and Growth Corridor

**Flood Risk**

- Development in areas of higher risk to conform to the Strategic Flood Risk Assessment  
 - Sequential and Exception tests for allocated sites in higher risk areas

**Housing**

- Over 40% Increase on London Plan Target  
 - 50% Affordable Housing  
 - Mix of housing types  
 - Estate renewal

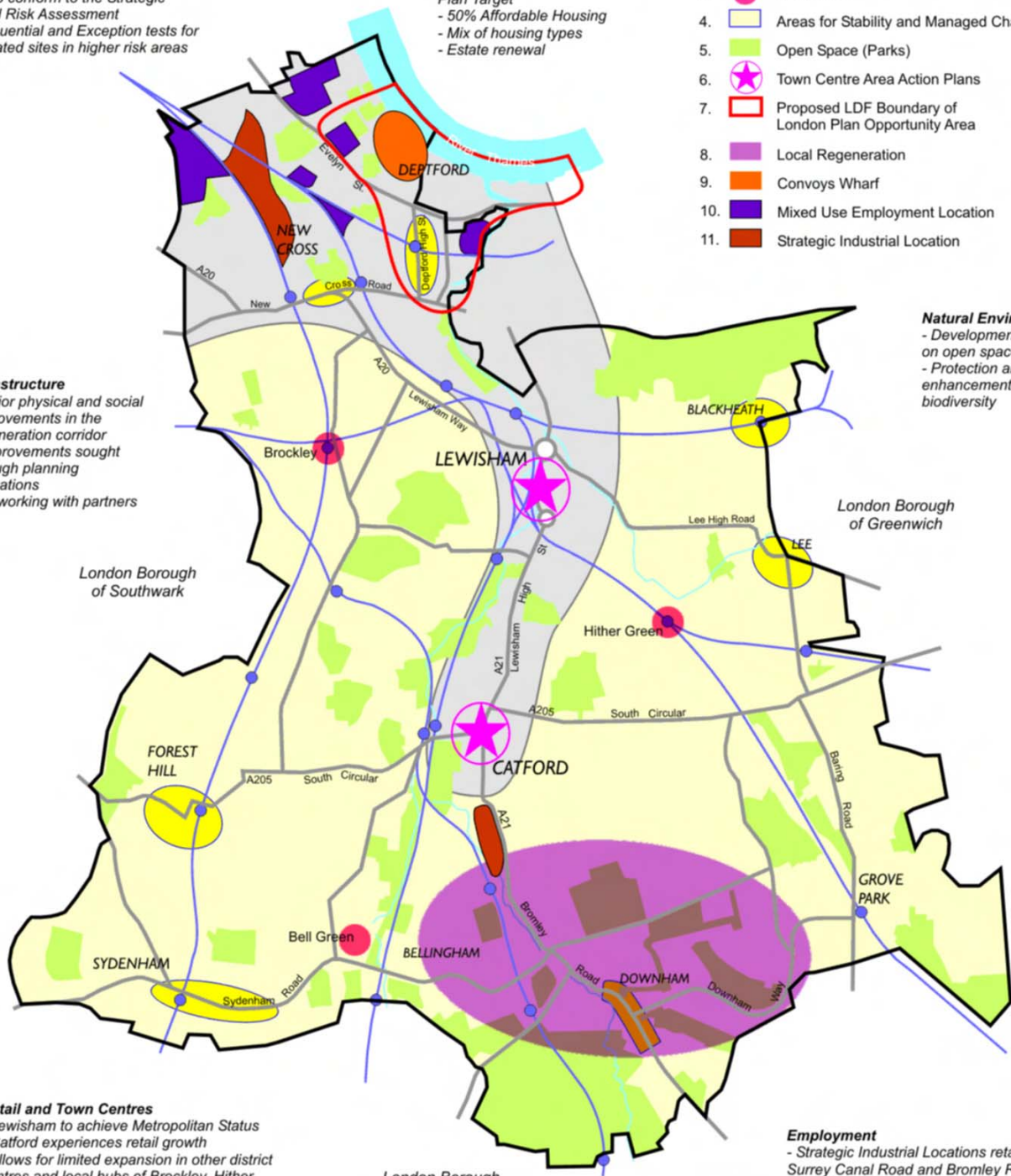
1. Regeneration Corridor
2. Activity Hubs
3. Local Hubs
4. Areas for Stability and Managed Change
5. Open Space (Parks)
6. Town Centre Area Action Plans
7. Proposed LDF Boundary of London Plan Opportunity Area
8. Local Regeneration
9. Convoys Wharf
10. Mixed Use Employment Location
11. Strategic Industrial Location

**Infrastructure**

- Major physical and social improvements in the regeneration corridor  
 - Improvements sought through planning obligations and working with partners

**Natural Environment**

- Development resisted on open space  
 - Protection and enhancement of biodiversity



**Retail and Town Centres**

- Lewisham to achieve Metropolitan Status  
 - Catford experiences retail growth  
 - Allows for limited expansion in other district centres and local hubs of Brockley, Hither Green and Bell Green

**The Built Environment**

- Density determined by public transport accessibility level and character of the area  
 - Strong emphasis on architectural design, particularly in town centres and mixed use sites  
 - Development designed with sustainability in mind  
 - Conservation areas maintained  
 - Historic buildings protected

**Key Development Sites**

- Mixed Use Employment Areas in Deptford and New Cross  
 - Lewisham and Catford town centres  
 - Other key sites throughout the borough

**Employment**

- Strategic Industrial Locations retained in Surrey Canal Road and Bromley Road (35 ha)  
 - Mixed Use sites contribute to employment diversification and growth in Deptford and New Cross (24 ha)

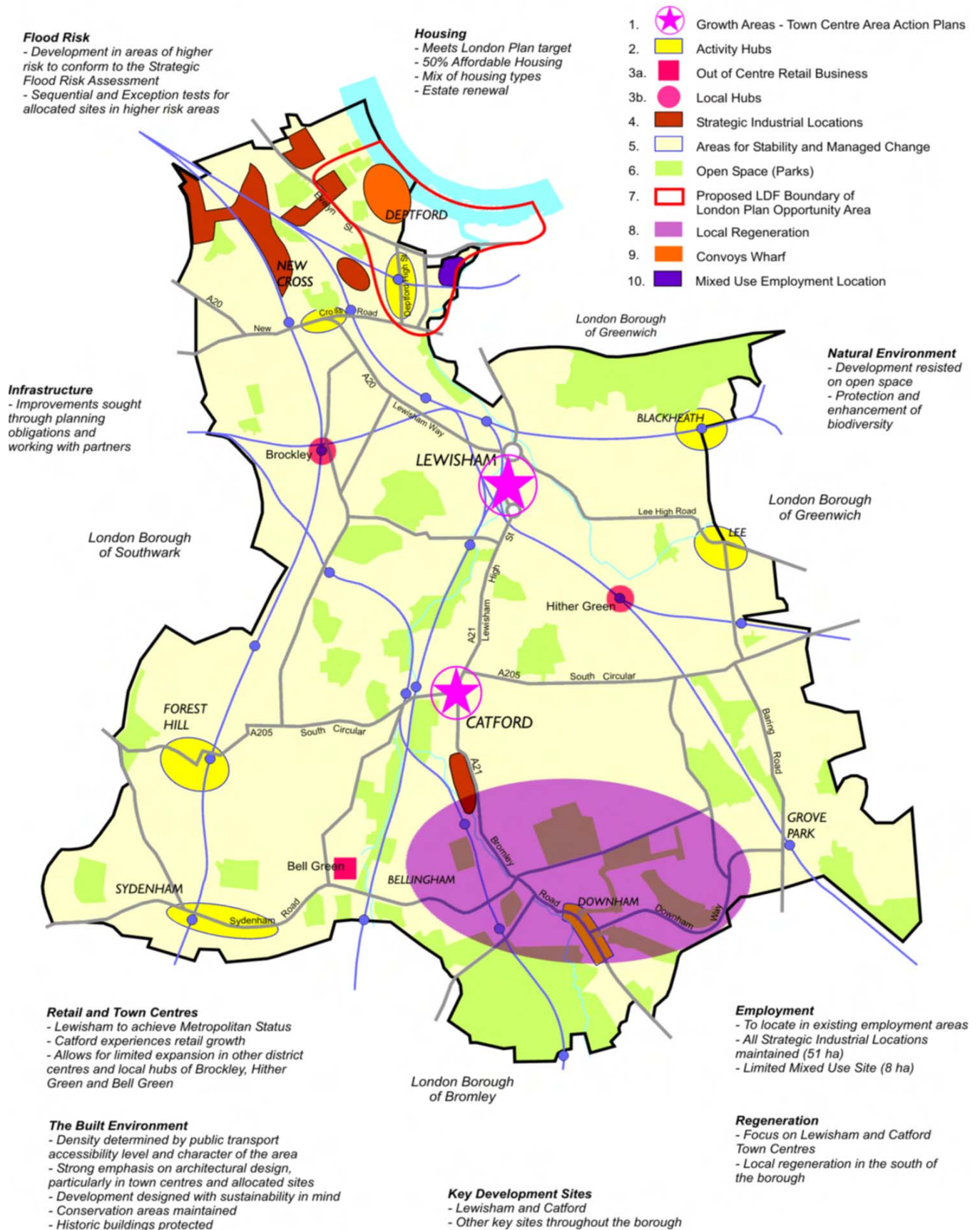
**Regeneration**

- Targeted focus on the regeneration and growth corridor particularly Deptford and New Cross  
 - Local regeneration in the south of the borough

Geographic Information & Research  
 Growth Scenario Option1 Sept2008.cdr  
 (Updated Jan 2009)

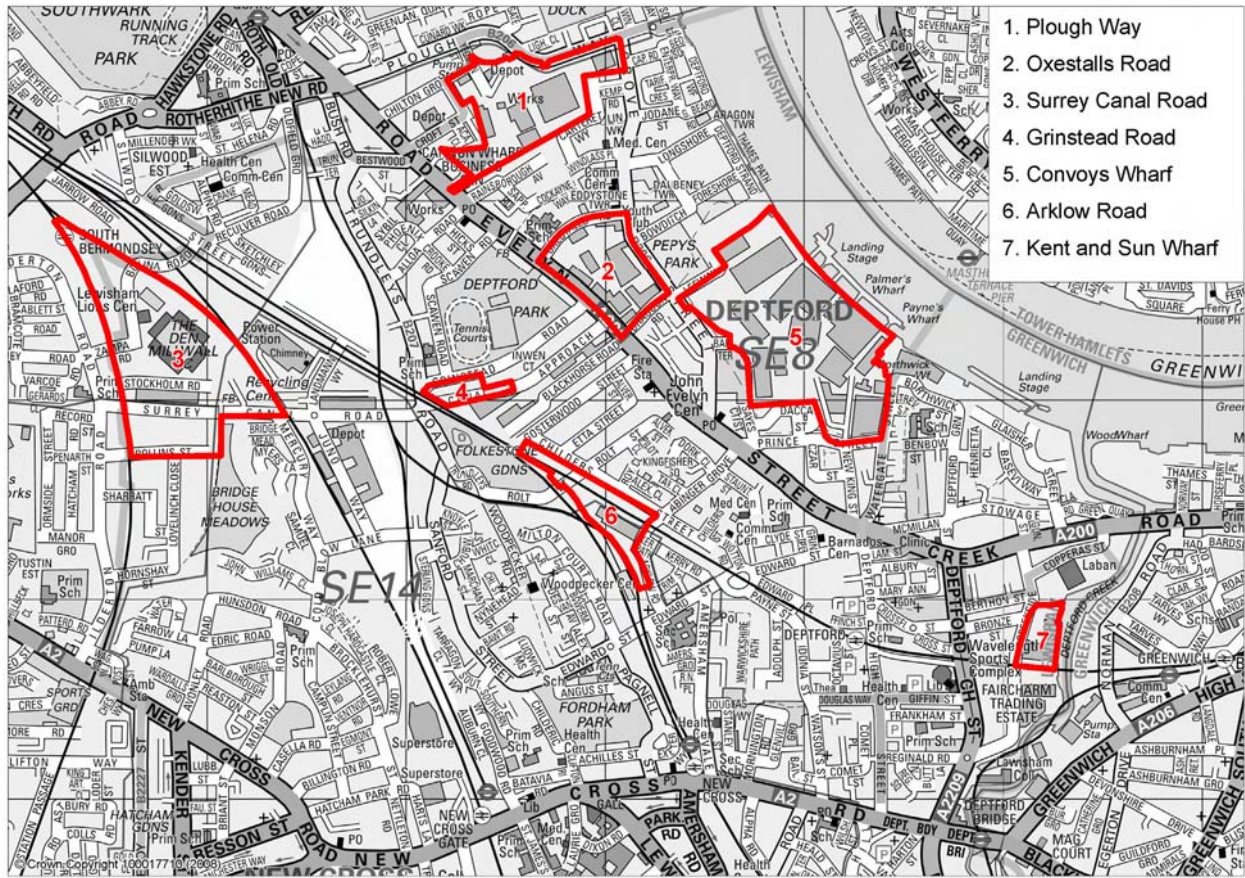


# Option 2 - Moderate approach to regeneration and growth



Geographic Information & Research  
 Growth Scenario Option2 Sept2008.doc  
 (Updated Jan 2009)

8.11 The key difference between Strategic Spatial Options 1 and 2, is that under Option 2 the six sites proposed as Mixed Use Employment Locations (MELs) in Deptford and New Cross would continue to operate as a Strategic Industrial Location (SIL) and a Local Employment Location (LEL). This is shown on the figure below.



8.12 However, the quantum of redevelopment would be significantly less than Strategic Spatial Option 1 and therefore the opportunities for physical, environmental and social regeneration in the Evelyn and New Cross wards would be significantly reduced.

8.13 As with Strategic Spatial Option 1, two regeneration corridors would be established. The first would encompass the London Plan ‘opportunity areas’ of Catford-Lewisham-New Cross including Deptford and Creekside.

**Specific Policy Options**

8.14 In order to implement the strategy, specific policy options (covering issues relating to housing, the economy, the environment and community services) have also been prepared and are grouped into the same themes as the strategic objectives.

8.15 What follows in section 9 is a summary of the appraisal findings against the core strategy’s objectives, the two strategic spatial options, and the specific policy options.



## 9. Appraisal findings

### 9.1 Understanding the appraisal

9.1 This section of the report will set out a summary of the main issues resulting from the appraisal of the Core Strategy Options Report against the sustainability objectives.

The first section (section 9.2) summarises the assessment results of the SA objectives carried out against each other to highlight any internal conflicts. It also proposes mitigation measures to reduce the potential conflicts.

The second section (section 9.3) summarises the assessment results carried out for the Core Strategy objectives against the SA objectives to highlight any inconsistencies among the two set of objectives. It highlights the key benefits and conflicts identified and proposes mitigation measures to reduce the conflicts.

The third section (section 9.4) summarises the assessment results carried out for the two strategic spatial options against the SA objectives. It highlights the key benefits and conflicts identified for each option.

The last section (section 9.5) summarises the assessment for each specific policy option grouped under four themes against the sustainability objectives. It highlights the key benefits and conflicts associated with each policy theme and proposes mitigation measures.

9.2 The appraisal has mostly been carried out using a series of matrix tables that are set out as appendices to this SA report. They deal with the following:

- Appendix 3 compares the internal consistency of the sustainability objectives
- Appendix 4 compares the Core Strategy Options strategic objectives with those for the sustainability appraisal
- Appendix 5 compares the sustainability objectives against the two strategic spatial options put forward in the Core Strategy Options report and
- Appendix 6 compares the specific policy options put forward in the Core Strategy Options report against the sustainability objectives.

9.3 The matrix tables set out in the appendices use the following symbols to appraise the impact:

Symbol	Interpretation against the SA objectives
++	Very positive outcome
+	A positive outcome
--	Very negative outcome
-	Negative outcome
0	Neutral
?	Unclear
I	Depends upon implementation, i.e. how development takes account of a particular issue is subject to the implementation

## 9.2 Testing the internal consistency of the SA objectives

- 9.4 A matrix was prepared to appraise any discrepancies among the SA objectives and can be found in Appendix 3. The purpose of this exercise is to highlight any potential conflicts among the SA objectives. The potential conflict can arise because promoting any kind of growth such as increasing residential units will inevitably have some negative environmental effects. The second kind of potential conflict will arise when different objectives such as the need for more homes and the need for employment space may clash.
- 9.5 Appendix 3 shows that the vast majority of the sustainability objectives are consistent with each other or have a neutral impact on each other. The table below provides an explanation of the potential conflicts between the sustainability objectives.

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
<p><b>Objective 2</b></p> <p>To encourage and promote employment and new enterprises in Lewisham</p>	<p>There is a potential conflict with <b>Objective 3</b> (to minimise the production of waste and increase waste recovery and recycling) as it is likely that if more employment is created then the businesses will generate more waste.</p> <p>However, the Core Strategy will promote policies that mitigate against this by encouraging recycling and the efficient use of resources.</p>
	<p>There is a potential conflict with <b>Objective 5</b> (to maintain and enhance open space, biodiversity, flora and fauna) as more employment and businesses could be built on open space or currently vacant property or land that has established biodiversity.</p> <p>This will be mitigated by introducing policies to protect open space from being built on and requiring new development to introduce 'living roofs and walls' and landscaping that will encourage biodiversity.</p>
	<p>There is a potential conflict with <b>Objective 6</b> (to improve air quality and reduce noise and vibration) as more business could mean more air pollution either from the production process or from employees who may travel by motor vehicle or from delivery vehicles.</p> <p>This will be mitigated by policies that minimise the use of cars and encourage the use of public transport.</p>
	<p>There is a potential conflict with <b>Objective 9</b> (to minimise and mitigate flood risk) as the major sites for encouraging employment are located in areas of high flood risk.</p> <p>This risk is mitigated due to the fact that the sites in Deptford are protected from flood risk by the Thames Barrier. In addition the Strategic Flood Risk Assessment and the 'sequential test' in PPG 25 will specify measures to minimise any adverse impact.</p>

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
	<p>There is a potential conflict with <b>Objective 11</b> (to conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough) if protecting historic buildings prevents their reuse for employment purposes. Business use may also not be compatible with conservation area status.</p> <p>The core strategy will mitigate by introducing policies that seek to locate unsuitable business uses away from conservation areas.</p> <p>There is a potential conflict with <b>Objective 12</b> (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) because the same land cannot be used for both homes and jobs.</p> <p>The core strategy will seek to mitigate by making land allocations that provide for both the identified employment and homes.</p>
<p><b>Objective 3</b></p> <p>To minimise the production of waste and increase waste recovery and recycling</p>	<p>There is a potential conflict with <b>Objective 12</b> (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as more homes will likely create more waste.</p> <p>However, policies will be introduced to mitigate against this by encouraging the provision of recycling facilities and ensuring the borough provides for waste facilities.</p>
<p><b>Objective 4</b></p> <p>To ensure the efficient use of natural resources</p>	<p>There is a potential conflict with <b>Objective 2</b> (to encourage and promote employment and new enterprises in Lewisham) and <b>Objective 12</b> (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as resources such as water, gas and oil will be consumed at a faster rate with increased business and residents.</p> <p>This will be mitigated by requiring sustainable construction techniques and the use of on-site renewable energy technology.</p>
<p><b>Objective 5</b></p> <p>To maintain and enhance open space, biodiversity, flora and fauna</p>	<p>There is a potential conflict with <b>Objective 12</b> (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as there may be pressure to build housing on open space.</p> <p>This will be mitigated by policies that protect open space from built development and identifying sufficient homes on brownfield sites.</p>

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
<p><b>Objective 8</b></p> <p>To mitigate and adapt to the impact of climate change</p>	<p>There is a potential conflict with <b>Objective 12</b> (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as new housing construction and the people that will occupy the homes will potentially lead to an increase in CO2 emissions by consuming more natural resources.</p> <p>This will be mitigated by requiring sustainable construction techniques and the use of on site renewable energy technology.</p>
<p><b>Objective 9</b></p> <p>To minimise and mitigate flood risk</p>	<p>There is a potential conflict with <b>Objective 12</b> (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as some sites for new homes are located in a flood risk area.</p> <p>This will be mitigated by applying the sequential test to ensure all sites are suitably located or protected.</p>
<p><b>Objective 12</b></p> <p>To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home</p>	<p>There is a potential conflict with <b>Objective 2</b> (employment), <b>Objective 5</b> (Open spaces and biodiversity), <b>Objective 9</b> (flood risk) and <b>Objective 8</b> (Climate change).</p> <p>The impacts and mitigation measures have been discussed above.</p>

### 9.3 Commentary on the assessment of Core Strategy strategic objectives

9.6 This section summarises the appraisal carried out to test the proposed strategic objectives contained in the Core Strategy Options Report against each SA objective to ensure that the Core Strategy strategic objectives are sustainable and where possible remove any internal conflicts.

9.7 The appraisal has found that most of the strategic objectives were either compatible or neutral when appraised against the sustainability appraisal objectives. The full appraisal can be found in Appendix 4. The key findings from the appraisal are include below.

#### 9.8 Objective 1: Facilitate Development

##### Key benefits identified through the SA process

##### Socio-Economic

- Redevelopment opportunities will be used to secure substantial physical regeneration in the north of the borough and the associated socio-economic benefits are likely to contribute to sustained economic growth (SA Objective 1).
- Larger scale redevelopment provides the opportunity to promote and increase local employment and training opportunities (SA Objective 2).

- Creating additional local employment opportunities may in turn help to address deprivation and social exclusion issues and could contribute to the health and well-being of the community (SA Objective 13, 14), contributing towards a sense of community identity and welfare (SA Objective 17).

#### Key conflicts identified through the SA process

##### Environmental

- Economic growth achieved through increased development will increase domestic and commercial waste (SA Objective 3).
- Increased development will lead to an increase in consumption of natural resources which may in turn have negative impacts on climate change (SA Objective 4, 8).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 5).
- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 6, 7).
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 9).

#### Mitigation measures

- Development will need to occur in accordance with the waste hierarchy.
- The use of sustainable design and construction techniques and building energy efficiency measures can address CO2 issues.
- Qualitative improvements to public open space, resisting its loss and on-site provision need to undertaken where appropriate.
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in demand to travel by car arising from development intensification. However, funded and planned and public transport and road infrastructure improvements should address capacity concerns and impact positively on air quality.
- The Council's SFRA and the subsequent Sequential Test (ST) will need to be used to determine land use acceptability.

## 9.9 **Objective 2: Increase in the number of households**

#### Key benefits identified through the SA process

##### Socio-economic

- An increase in the number of households is likely to contribute to sustained economic growth by increasing the opportunity for the provision of local employment and training. An element of affordable housing and a suitable housing mix would contribute to meeting specific housing needs (SA Objectives 1, 2, 12).
- Addressing specific housing needs is likely to improve the health and well-being of the community. This may also lead to a reduction in crime and social exclusion further encouraging a sense of community identity (SA Objectives 13, 14, 17).

### Key Conflicts identified through the SA process

#### Environmental

- Increased housing development will increase domestic waste (SA Objective 3).
- With the increased housing growth, there is a likely potential in the increase in consumption of natural resources leading to additional CO2 emissions - impacting negatively on climate change (SA Objectives 4, 8).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 5).
- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8)
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 9).

#### Mitigation measures

- Development will need to occur in accordance with the waste hierarchy.
- The use of sustainable design and construction techniques and building energy efficiency measures can address CO2 issues.
- Qualitative improvements to public open space, resisting its loss and on-site provision need to undertaken where appropriate.
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in demand to travel by car arising from development intensification. However, funded and planned and public transport and road infrastructure improvements should address capacity concerns and impact positively on local air quality.
- The Council's SFRA and the subsequent Sequential Test (ST) will need to be used to determine land use acceptability.

### 9.10 **Objective 3: Increase local employment opportunities**

#### Key Benefits identified through the SA process

#### Socio-Economic

- Increased local employment opportunities are likely to contribute to sustained economic growth and promote and encourage new enterprises in the borough (SA Objectives 1, 2).
- Creating additional local employment opportunities may in turn help to address deprivation and social exclusion issues and could contribute to the health and well-being of the community (SA Objective 13 and 14), contributing towards a sense of community identity and welfare (SA Objective 17).
- This may also lead to a reduction in crime and anti-social behaviour by providing more job opportunities (SA Objective 16).



### Key Conflicts identified through the SA process

#### Environmental

- Increased economic activity and employment uses will increase commercial waste (SA Objective 3).
- With the increased housing growth, there is a likely potential in the increase in consumption of natural resources leading to additional CO2 emissions - impacting negatively on climate change (SA Objectives 4, 8).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 5).
- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8).
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 9).

#### Mitigation measures

- Development will need to occur in accordance with the waste hierarchy.
- The use of sustainable design and construction techniques and building energy efficiency measures can address CO2 issues.
- Qualitative improvements to public open space, resisting its loss and on-site provision need to undertaken where appropriate.
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in demand to travel by car arising from development intensification. However, funded and planned and public transport and road infrastructure improvements should address capacity concerns and impact positively on local air quality.
- The Council's SFRA and the subsequent Sequential Test (ST) will need to be used to determine land use acceptability.

### 9.11 **Objective 4: Climate Change**

#### Key Benefits identified through the SA process

#### Socio-Economic

- Positive contributions towards sustained economic growth by promoting a cleaner and greener environment and a low carbon local economy (SA Objective 1).
- A cleaner and greener environment impacts positively on other social objectives such as health and well-being and encouraging a sense of community and welfare (SA Objectives 13, 17).

#### Environmental

- It will contribute positively towards promoting the efficient use of natural resources through low carbon technologies thereby reducing the dependency on fossil fuels (SA Objective 4).

- A clean and green borough will impact positively on local air quality and further helps in improving the quality of existing open spaces and biodiversity stock (SA Objectives 4, 5).
- Promotes reductions in CO2 emissions (SA Objectives 8, 9).
- Improved local air quality and reductions in CO2 emissions will impact positively on the existing historic environment and townscape of the borough (SA Objectives 10, 11).

The objective itself is promoting mitigation and adaptive measures to reduce the impact on climate change from all new developments and as such did not show any conflicts.

#### 9.12 **Objective 5: Flood Risk**

##### Key benefits identified through the SA process

- Flood risk issues identified in Lewisham's SFRA will be addressed. Most of the growth corridor is located in the north of the borough, and large development sites are located within Flood Zone 3a which has a high probability of flood risk, therefore minimising and mitigating against flood risk is crucial (SA Objective 9).
- Addressing flood issues is likely to contribute to the health and well-being of the community (SA Objective 13).

The objective itself is promoting mitigation and adaptive measures to reduce the risk of flooding from all new developments and as such did not show any conflicts.

#### 9.13 **Objective 6: Open spaces and environmental assets**

##### Key benefits identified through the SA process

##### Socio-Economic

- The protection and capitalisation of environmental features will contribute to sustained economic growth and will promote spaces for leisure activities (SA Objectives 1, 18).
- Providing waterways and green links as a part of this objective will contribute to the health of the community, which could further lead to a sense of community identity and welfare (SA Objective 13, 17).
- Improving the existing stock of open spaces could lead to a reduction in crime levels by promoting more activity throughout the borough (SA Objective 16).

##### Environment

- Positive impacts on reducing and mitigating flooding and associated climate change impacts (SA Objectives 8, 9).
- The townscape/landscape and historic environment will be enhanced (SA Objectives 10, 11).

##### Key conflicts identified through the SA process

- Existing open space is potentially under threat due to the limited available land supply needed to meet other land use targets, for example on housing or employment (SA Objective 2, 12)

#### Mitigation measures

- Qualitative improvements to public open space, resisting its loss and on-site provision need to undertaken where appropriate.

### 9.14 **Objective 7: Waste management**

#### Key benefits identified through the SA process

##### Environmental

- Promoting the waste hierarchy of 'reduce, reuse, recycle, recover and disposal' would contribute to the efficient use of natural resources (SA Objective 3).
- Effective waste management could reduce the emission of greenhouse gases in particular methane - potentially helping to mitigate against climate change (SA Objective 8).
- Mitigating climate change can reduce flood risk (SA Objective 9).
- The quantum of development opportunities proposed in Deptford and New Cross provides the possibility of a waste to energy scheme through the South East London Combined Heat and Power plant (SELCHP) (SA Objectives 3, 4, 6, 8, 9).

##### Socio-Economic

- Managing and providing a sufficient number of waste facilities positively impacts on sustained economic growth and existing and future residents (SA Objectives 1, 13).

#### Key Conflicts identified through the SA process

- Waste management will need to compete with other land uses such as housing and employment that are vital to the economy (SA Objectives 1, 2, 12).

#### Mitigation measures

- Ensuring a sufficient number of waste facilities to support the existing and future demand is important and must not be overlooked to meet other land use pressures.

### 9.15 **Objective 8: Transport**

#### Key benefits identified through the SA process

##### Socio-Economic

- Ensuring and promoting a safe, convenient and sustainable transport system will contribute to the local economy by providing better transport links and improving accessibility (SA Objectives 1, 2).
- Improving accessibility with a focus in deprived wards such as Evelyn and New Cross will address deprivation issues (SA Objectives 13, 14).
- Improved accessibility will impact positively on people with limited mobility (SA Objective 13).

##### Environment

- Reducing the need to travel and promoting sustainable transport modes such as walking and cycling is likely to address existing local air quality and noise issues and will help enhancing the quality of open spaces and biodiversity features (SA Objectives 5, 6).

- It is also likely to contribute towards the efficient use of natural resources by reducing the dependency on fossil fuels, which in turn could help in reducing the negative impacts on climate change and flooding by reducing CO2 emissions (SA Objectives 4, 8, 9).
- Improved local air quality and promoting green links is likely to protect and enhance the existing quality of historic environment, townscape and other archaeological aspects of the borough (SA Objectives 10, 11).

The objective itself is promoting mitigation measures to reduce the negative impact of transport from all new developments and as such did not show any conflicts.

#### 9.16 **Objective 9: Safety**

##### Key benefits identified through the SA process

###### Socio-Economic

- Promoting safer and innovative design is likely to contribute towards sustained economic growth by creating a safer environment for the community (SA Objective 1).
- It will help in reducing crime and anti-social behaviour which could further help in improving the health of people and encourage a sense of community welfare (SA Objectives 13, 16, 17).

The objective itself is promoting measures to promote safety from all new developments and as such did not show any conflicts.

#### 9.17 **Objective 10: Social Infrastructure**

##### Key benefits identified through the SA process

###### Socio-Economic

- Providing the required social infrastructure facilities such as health care, schools, sports and recreational facilities etc, to meet existing and future needs will help in contributing towards sustained economic growth (SA Objective 1).
- Increasing facilities in various services such as health, education, sports and recreation etc will lead to an increase in local employment opportunities contributing further to the local economy (SA Objective 2).
- The provision of such facilities is likely to promote a sense of community identity and welfare. This could further contribute to the health and well-being of the community (SA Objective 17, 18).
- Promoting facilities for sports and recreation and education, is likely to raise the education and sports standards in the borough. Additionally, engaging people in activities on education and sports could lead to reduction in crime levels and social exclusion (SA Objective 14, 15, 16).

##### Key conflicts identified through the SA process

###### Socio-Economic

- Social infrastructure facilities will need to compete with other land uses such as housing and employment (SA Objectives 2, 12).

## Environment

- Development of such facilities will increase the amount of waste generated and is likely to place pressure on the existing waste management facilities (SA Objective 3).
- An increase in the number of facilities is likely to place pressure on existing stock of natural resources as it will be consumed at much faster rate and could in turn increase the emissions of CO<sub>2</sub> ( SA Objectives 4, 8).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 6, 7).
- Large scale development opportunities are primarily proposed to be located in the flood Zone 3a which has a high probability of flood risk. This will place land uses and population at the risk of flooding ( SA Objective 9).

## Mitigation measures

- Development will need to occur in accordance with the waste hierarchy.
- The use of sustainable design and construction techniques and building energy efficiency measures can address CO<sub>2</sub> issues
- Qualitative improvements to public open space, resisting its loss and on-site provision need to undertaken where appropriate.
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in demand to travel by car arising from development intensification. However, funded and planned and public transport and road infrastructure improvements should address capacity concerns and impact positively on local air quality.
- The Council's SFRA and the subsequent Sequential Test (ST) will need to be used to determine land use acceptability.

## 9.18 **Objective 11: Protect and enhance character**

### Key benefits identified through the SA process

#### Socio-Economic

- Enhancing the existing character will contribute positively by creating a positive environment and a sense of community identity (SA Objective 13, 17).

#### Environment

- Protecting and enhancing the character of the borough is likely to enhance the townscape and other existing features ( SA Objectives 10, 11).
- Additionally, it will have benefits for local air quality, open spaces and biodiversity features (SA Objective 5, 6).

The objective itself is promoting measures to promote and enhance the existing landscape and townscape characters from all new developments and as such didn't show any conflicts.

## 9.4 Commentary on the assessment of the strategic spatial options

- 9.19 As detailed in Section 8, the Core Strategy Options report considers two strategic spatial options to accommodate growth and regeneration within the borough over the next 15 years in order to meet national and regional policy requirements.
- 9.20 Strategic Spatial Option 1 seeks to ensure and support borough-wide regeneration through a regeneration and growth corridor, while Strategic Spatial Option 2 promotes a more modest approach to borough-wide regeneration and growth.
- 9.21 Both options were appraised against the SA framework and the full appraisal can be found in Appendix 5. The following section summarises the appraisal tables and highlights:
- the key sustainability benefits arising from each option
  - the key sustainability conflicts and
  - suitable mitigation measures to address the conflicts.

### 9.4.1 Strategic Spatial Option 1: Borough wide regeneration and growth corridor option

#### Key benefits identified through the SA process

##### Economic

- There is the potential to attract further investment to the borough and increase the contribution the proposed Mixed Use Employment Locations (MEL) can make to sustained economic growth (SA Objective 1).
- The release of Strategic Industrial Land (SIL) will focus employment opportunities towards growth sectors that are suitable to the borough as identified in the Employment Land Study (SA Objectives 1, 2). The retention of an element of SIL will contribute to the continued economic functioning of London and the safeguarding of the borough's waste sites (Objective 1).
- The retention of existing locally significant employment locations will contribute towards sustainable economic growth (SA Objective 1).
- Major retail development and growth will be focussed in Lewisham and other major and district town centres with high accessibility (SA Objectives 1, 2, 7).
- Retail (and complimentary mixed-uses) growth to secure Lewisham town centre as a metropolitan centre will bring associated economic and employment opportunities and benefits (SA Objectives 1, 2).

##### Environmental

- The quantum of development opportunities proposed in Deptford and New Cross provides the possibility of a waste to energy scheme through the South East London Combined Heat and Power plant (SELCHP) (SA Objectives 3, 4, 6, 8, 9).
- Development is resisted on open space particularly Metropolitan Open Land and Sites of Nature Conservation (SA Objective 5).
- The use of previously developed land for housing and employment uses (particularly the proposed MEL) further protects the borough's open space and its 26 conservation areas (SA Objective 5, 10, 11).
- Development opportunities promote and increase accessibility to the River Ravensbourne as well as naturalisation of the river bed (SA Objectives 5, 9, 10).

- Focussing major growth in town centres and district centres where public transport accessibility is higher will have direct benefits in reducing CO2 emissions in the borough by reducing the need to travel, particularly by car. This has a relationship to mitigating the effects of climate change, and addressing local air quality (SA Objectives 6, 7, 8).
- The scale of development proposed has the opportunity to raise the overall standard of design, environmental quality and improve the permeability and accessibility within the borough, particularly in the New Cross and Evelyn wards. This would be achieved through the provision of new landmarks and links within the area and to the Thames, contributing towards helping to solve the problems of physical severance caused by railway viaducts and increase the connectivity of the MELs to the rest of the borough, particularly new access routes to stations (SA Objectives 5, 6, 7, 8, 10).
- Site redevelopment for MEL is considered to assist in reducing the amount of hard-standing and hard surfaces through the provision of gardens, living roofs and new drainage (SA Objectives 5, 6, 8, 9, 10).
- Mixed-use development will reduce the need to travel on a day-to-day basis (SA Objectives 6, 7, 8)
- Improving employment and housing opportunities in the north of the borough especially in the most deprived wards (New Cross, Evelyn and Lewisham Central) would contribute towards their urban renewal (SA Objective 10).

#### Social

- An increase in housing provision over the plan period over and above the London Plan target, if development on all identified sites is achieved, would help meet housing need identified through the SHMA. An element of affordable housing and a suitable housing mix would contribute to meeting specific needs (SA Objective 12).
- The inclusion of the New Cross and Evelyn wards for significant regeneration contribute towards social inclusion and reducing inequalities and deprivation (SA Objective 13, 14).
- The creation of new places through larger scale regeneration projects, provides the opportunity to provide community, local shopping and leisure facilities in an area of the borough where provision is lacking (SA Objectives 14, 17).
- New development will take account of the principles relating to safer by design and sustainable design and construction. The application of these principles is likely to reduce the fear and perception of crime and improve energy efficiency (SA Objectives 16, 17).

#### Key conflicts identified through the SA process

##### Economic

- There will be a reduction in the number of sites and the amount of choice available to industrial/business uses with less demanding environmental requirements. This will lead to a loss of existing jobs and industries (SA Objectives 1, 2).
- Land allocated to housing does not add to the supply of employment land, unless part of a mixed use development/allocation, although additional population can increase the local employment base and contribute towards economic growth (SA Objectives 1, 2).

## Environmental

- New homes and businesses will inevitably create more on-going waste, as well as waste arising from the construction phase (SA Objectives 3, 4, 6, 8).
- An increase in population leads to an increase in the consumption of natural resources, including water (SA Objectives 4, 8).
- Increased development will lead to increased energy consumption (SA Objectives 4, 8).
- Increased development will reduce the per capita amount of open space, and has the potential for habitat loss impacting negatively on biodiversity (SA Objective 5).
- Any increase in population and associated development will place increased pressure on public transport facilities, and in the absence of control and management of the supply of on-street parking will lead to an increase in on-street car parking demand (SA Objectives 6, 7, 8).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8).
- Obvious conflicts relate to flooding within the regeneration and growth corridor specifically within the town centres of Catford and Lewisham, and for key development areas within Deptford and New Cross (SA Objectives 8, 9).
- Sustainable design and construction measures will need to respect the historic environment and townscape (SA Objectives 10, 11).

## Social

- There is a need to ensure housing provision meets housing need and the requirements of the borough's population (SA Objective 12).
- Local air quality will have a direct impact on the health of the population (SA Objective 13).
- Employment and training opportunities need to be provided to the local population (SA Objective 15).
- Increased development has the potential to increase crime and its perception (SA Objective 16, 17).

### **9.4.2 Strategic Spatial Option 2: Moderate option to deliver national and regional requirements**

9.22 As stated earlier, the key difference between Strategic Spatial Options 1 and 2, is that under Option 2, sites proposed as Mixed Use Employment Locations (MELs) in Deptford and New Cross would continue to operate as a Strategic Industrial Location (SIL) and a Local Employment Location (LEL).

9.23 However, under Option 2 the quantum of redevelopment would be significantly less than Strategic Spatial Option 1 and therefore the opportunities for physical, environmental and social regeneration in the Evelyn and New Cross wards would be significantly reduced.

9.24 The discussion on the appraisal therefore focuses on the key differences between the two options and highlights the key benefits or conflicts that could arise if Option 2 was implemented. The appraisal does not repeat the benefits or conflicts which are considered to be similar to Option 1.



### Key benefits identified through the SA process

#### Economic

- Option 2 protects land designated as a SIL. This could provide the opportunity to strengthen the existing economic activities/sectors in the borough (SA Objectives 1, 2).

#### Environmental

- Reducing the amount of development when compared to Option 1 will reduce the potential negative impacts on local air quality (SA Objective 6).
- Not developing the large sites in the Evelyn and New Cross wards for MEL reduces the number of homes and business subject to flood risk (SA Objective 9).

#### Social

- Strategic housing targets, albeit at a lower quantum, would still be met, contributing towards the housing requirements identified in Lewisham's SHMA (SA Objective 12).

### Key conflicts identified through the SA process

#### Socio-Economic

- While Option 2 delivers the required homes it does not alter the employment structure of the borough, and therefore the full economic potential of the borough likely to be missed as there is a potential loss of attracting a wider economic base as suggested in Lewisham Employment Land Study if land designations remain largely unchanged (SA Objectives 1, 2, 12).
- Retaining land as a SIL designation (industrial use) in the Evelyn and New Cross wards, will not generate sufficient investment to change the character of these localities. As the mixed-use sites proposed in Option 1 are large areas, it is possible to design 'place shaping schemes' that can transform the physical and social character. Under Option 2 this would not be delivered (SA Objectives 1, 10, 14, 17).
- Opportunities to address housing need and ensure mixed and balanced communities in the Evelyn and New Cross wards will be severely reduced (SA Objectives 12, 14, 17).

#### Environmental

- Conflicts will occur relating to increased waste generation and pressures on waste and recycling facilities, additional demand for natural resources, the provision of open space (per capita), and air and noise quality (SA Objectives 3, 4, 5, 6, 8) albeit less than Option 1.

### 9.4.3 Recommended mitigation measures to address potential conflicts arising from both Strategic Spatial Options 1 and 2

#### Economic

- A range of employment sites and opportunities should be provided to ensure a mixed and sustainable economic base.
- Mixed use employment sites should include a reasonable percentage of employment uses as part of the land use mix to ensure the local economic base is maintained and strengthened. Where appropriate, planning obligations and other plans can make provisions for assisting unemployed and low income earners with training and employment opportunities.
- Training opportunities should be provided to the local population.

#### Environmental

- The Council's SFRA and the subsequent Sequential Test (ST) will need to be used to ensure land uses are acceptable and recommendations are implemented.
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in demand to travel by car arising from development intensification. However, funded and planned public transport and road infrastructure improvements should address capacity concerns and impact positively on local air quality.
- Qualitative improvements to public open space, resisting its loss and on-site provision need to be undertaken where appropriate.
- Development will need to occur in accordance with the waste hierarchy.
- The use of sustainable design and construction techniques and building energy efficiency measures can address CO2 issues.
- Appropriate design guidelines can ensure historic and townscape issues are appropriately assessed.

#### Social

- A mix in housing type and tenure should be provided in all major developments.
- Minimising the need to travel by car can contribute to improved air quality and the health of the population.
- Accessibility to open space and walk and cycle ways can also impact positively on health.
- Safer by Design guidance needs to be followed in order to address crime issues.
- The social infrastructure requirements arising from a development need to be assessed.

### 9.4.4 Summary of the SA findings for the Strategic Spatial Options

9.25 The appraisal of the strategic spatial options through the SA framework suggests that there are more socio-economic benefits associated with Option 1, while the environmental impacts (for both options) will need to be addressed through implementation and mitigation measures.

9.26 Option 1 is considered to provide a wider context for regeneration and thus promotes and enhances the socio-economic objectives. The scale of development proposed resulting in

increased housing and a wider employment base (and the related training opportunities) are significantly greater under this option.

- 9.27 Option 2, delivers limited change in the overall physical form for the north of the borough, particularly, with the status quo maintained for Strategic Industrial Land allocations. This will limit the opportunities to address deprivation in the Evelyn and New Cross wards, achieved through Option 1, which could radically improve the physical environment.

## **9.5 Commentary on the assessment of the policy options**

- 9.28 This section summarises the appraisal findings carried out for each policy option grouped under the following themes:

- Providing new homes
- Growing the local economy
- Climate change and environmental management and
- Building a sustainable community.

- 9.29 The completed appraisal can be found in the Appendix 6.

- 9.30 The alternatives considered as part of the Core Strategy Options Report are highlighted, otherwise the assessment of the alternatives is based on the SA prepared as part of the Preferred Options Report for the Core Strategy Options 2007.

### **9.5.1 Providing new homes**

- 9.31 The strategic policy options included and appraised under this theme are as follows:

- Housing provision
- Affordable housing threshold
- Housing tenure
- Housing mix
- Lifetime homes
- Accessible housing and
- Gypsies and travellers.

### **9.32 Key benefits identified through the SA process**

#### Socio-Economic

- The assessment suggested that each policy option is likely to contribute towards meeting the housing requirements identified in the Lewisham Strategic Housing Market Assessment (SA Objective 12).
- An element of affordable housing, a suitable housing mix and type, and provision of accessible housing, will address the wide range of housing need in the borough (families, disabled people, older, younger, and those on lower incomes). This approach would help in delivering mixed and balanced communities, and is likely to reduce social exclusion, poverty and promote a sense of well-being among residents (SA Objectives 12, 14, 17).

- Accommodating the needs of gypsies and travellers will address the housing needs of this group. The location of a suitable site or sites needs to address a range of socio-economic and environmental factors to ensure site selection meets the needs of this group, and is compatible with adjoining land-uses (SA Objectives 12, 14, 17).

#### Environmental

- The provision of new housing stock provides an opportunity to design and build new houses according to higher energy efficient design standards. Measures such as designing and building housing to the standards contained in the Code of Sustainable Homes, incorporating decentralised energy systems and on-site renewables, will ensure that the efficient use of energy takes place, and domestic CO2 emissions are reduced (SA Objectives 4, 6, 8, 12).

### 9.33 Key conflicts identified through the SA process

#### Socio-Economic

- The economic viability associated with an individual scheme providing affordable housing needs to be considered. As does the additional demand for existing local infrastructure (open space, health and recreation facilities, public transport and the like) resulting from population growth and the associated need to provide additional housing (SA Objectives 1, 18).
- The location of a suitable site or sites for gypsies and travellers needs to address a range of socio-economic and environmental factors to ensure site selection meets the needs of this group, and is compatible with adjoining land-uses. There is the potential for conflict (SA Objectives 12, 14, 17).
- Due to limited land resources within the borough, there is a risk associated with neglecting and promoting other land uses whilst accomplishing housing targets (SA Objectives 1, 2).

#### Environmental

- The use of natural resources and the impact of flooding and climate change, very much depends upon aspects related to implementation. Some temporarily effects are identified on the natural environment resulting from construction, which can be prevented through the implementation of schemes such as the Considerate Constructors Scheme, Code of Construction or ISO 14001 or securing improvements through Section 106 (SA Objectives 4, 6, 9).

### 9.34 SA suggestions

- It is important to ensure that the choices that are made under this theme achieves the maximum benefit in order to address the wide range of housing need in the borough. This includes the sustainable design and construction of any new housing.
- The Council and developers need to consider options to provide local infrastructure facilities to support any demand arising from new housing. The use of planning obligations should address this issue to some extent. However, a more coordinated and joint initiative among various council departments and developers could be looked at to ensure forecast need can be met.

- Any development must reduce and mitigate the potential impacts of flooding, and ensure the recommendations of Lewisham's Strategic Flood Risk Assessment and Sequential Test are implemented.

### 9.35 **Alternative options**

A range of alternative options were appraised and were included as part of the Preferred Options SA Report (2007).

## 9.5.2 **Growing the local economy**

9.36 The strategic policy options put together under this theme are as follows:

- Strategic Employment Locations
- Locally significant employment areas
- New and growing business and industrial sectors
- Convoys Wharf
- Other employment locations
- Retail hierarchy
- Location of retail development
- Lewisham and Catford town centres
- Vitality and viability
- Environment and design
- Accessibility and
- Local shopping facilities.

### 9.37 **Key benefits identified through the SA process**

#### Socio-Economic

- The options retains an area for Strategic Industrial Locations. This will enable the continuing industrial functioning of London as a whole, and also support the local economy by ensuring that a reservoir of land is available for these lower value economic uses (SA Objectives 1,2).
- Safeguarding Locally Significant Employment Locations will provide the opportunity to diversify the economic base and create local employment opportunity. More employment is likely to deliver a reduction in poverty and more social cohesion (SA Objectives 2, 13, 14 15, 16, 17).
- Providing for new and growing business sectors will provide more job opportunities and create a better physical environment. A more diverse economy can improve a range of social issues such as health, poverty and community cohesion (SA Objectives 1, 2, 13, 14, 16, 17, 18).
- Redevelopment of Convoys Wharf will provide for more homes and jobs but also such a large site can physically regenerate a poor area of Deptford thus bringing a number of social and economic benefits (SA Objectives 1, 2, 12, 13, 14 16, 17, 18).
- Protecting other employment areas will help maintain a balanced economy and provide for a range of social benefits such as improved health, reduce poverty and create more community cohesion (SA Objectives 1, 2, 13, 14, 16, 17).
- Maintaining the retail hierarchy shows benefit will provide a more varied retail offer which will capture more local spending and reduce unnecessary shopping trips outside the borough (SA Objectives 1, 2, 13, 14, 16, 17).

- Redevelopment in Lewisham and Catford town centres will raise Lewisham town centre to the status of a metropolitan centre and add more retail to Catford. This will create significant change and regeneration including new homes with benefits to employment, health and social inclusion (SA Objectives 1, 2, 13, 14, 16, 17, 18).
- Improving the vitality and viability of the district town centres will create destinations that people want to visit thus providing benefits in terms of jobs, reduced travel and the range of social improvements that improve health reduce poverty and create a more cohesive community (SA Objectives 1, 2, 10, 13, 14, 16, 17, 18).
- Improving the environment and promoting good design will bring benefit to local people as a good environment and good design for new buildings have been shown to have a positive correlation with economic prosperity (SA Objectives 1, 2, 11, 13, 16, 17, 18).
- Improving accessibility to destinations like town centres and within individual buildings for people with disabilities will promote public transport, walking and cycling that will have beneficial impact on air quality and reducing CO2 emissions (SA Objectives 1, 2, 7, 13, 14, 16, 17, 18).
- Protecting viable local shopping facilities shows benefit for SA objectives.

#### Environmental

- Retaining the recycling and waste management centre in Strategic Industrial Location will contribute in meeting waste apportionment targets as set out in the London Plan (SA Objective 3)

### 9.38 Key conflicts identified through the SA process

#### Socio-economic

- Due to limited land resources within the borough, it will be necessary to balance the achievement of employment and retail aims with other competing land uses, particularly residential development to ensure that other important targets are met (SA Objectives 1, 2, 12).

#### Environmental

- Retaining industrial uses may increase the proportion of industrial waste. Promoting retail uses in the borough is also likely to create more waste to a certain extent (SA Objective 3).
- Retaining warehouse and utility uses may add to the existing local transport activity thereby increasing air pollution and CO2 emissions in the borough. However, although business and industrial uses generate CO2 emissions, potentially generate some pollution and have other negative environmental effects, failure to reserve land for these essential uses within London would probably result in greater negative effects on CO2 emissions and air quality overall as these services would still need to be provided but would have to travel greater distances (SA Objectives 2, 3, 6, 7, 8).

### 9.39 SA Suggestions

It is important to ensure that the land use choices that are made achieve the maximum benefit for the whole community. Striking a balance between delivering employment and retail targets and other land uses is a must. New development must reduce and mitigate the

impacts of flooding and mitigation measures, especially if construction is taking place in areas identified in the Strategic Flood Risk Assessment as vulnerable to flooding.

#### 9.40 **Alternative options**

By maintaining the status quo for Strategic Industrial Land allocations, the Council could bring in only limited change in the borough's overall physical and economic status. To reap the maximum economic and regeneration benefits, it is important to realise the full potential of existing land resources efficiently.

#### 9.5.3 **Climate change and environmental management**

9.41 The strategic policy options put together under this theme are:

- Climate change and adapting to the effects
- Sustainable design and construction and energy efficiency
- Managing and mitigating the risk of flooding
- River and waterways network
- Open space protection
- Biodiversity
- Waterways naturalisation
- Character and design of open space and
- Waste management.

9.42 The assessment shows that each option under this theme contributes positively to most of the SA objectives.

#### 9.43 **Key benefits identified through the SA process**

##### Socio-Economic

- It allows the Council to seek higher environmental and sustainable design standards for new developments which would impact positively on the principle of sustained economic growth (SA Objective 1).
- Minimising any kind of environmental nuisance will have a positive impact on the health of the residents. Protecting open spaces, managing and mitigating the risk of flooding, improvements along river corridors, enhancing biodiversity, will have a positive cumulative impact towards improving local living standards (SA Objective 13).
- Improving the quality of open spaces and thereby positively impacting on biodiversity can provide better recreational opportunities for local residents (SA Objectives 5, 13, 18).
- Enhancement of the river corridor along the Ravensbourne and Quaggy will contribute towards promoting social inclusion by creating places to interact, promoting social well-being, and potentially reducing crime and anti-social behaviour (SA Objectives 13, 14, 16).
- Plans for river naturalisation will also help in reducing flood risk which in turn benefits the local economy and well-being of residents (SA Objectives 1, 13).

## Environmental

- The options encourage improvements in energy efficiency and reduce carbon emissions through proactive approaches. It promotes on-site renewable energy generation for both residential and non-residential development (SA Objectives 4, 8).
- The need to submit a Flood Risk Assessment (FRA), implementation of SUDS and living roofs and walls, enhancing and protecting open spaces, and the use of sustainable design and materials. It promotes Level 4 Code of Sustainable Homes/ or equivalent BREEAM standard for non-residential development by 2010 that not only contributes in reducing local CO2 emissions but will also add up to delivering national and regional carbon reduction targets (SA Objectives 8, 9 and 5).
- Encouraging living roofs and the provision of open spaces will enhance the townscape and landscape, improve local air quality, biodiversity and contribute to flood reduction. Improvements along the borough's river corridors will improve their physical and social quality (SA Objective 5, 6, 10).
- Allocating sites for waste management will help in dealing with existing and future waste apportionment figures (SA Objective 3).

### 9.44 **Key conflicts identified through the SA Process**

The policy options are promoting mitigation and adaptation measures to reduce the negative impact on climate change, flooding, waste and other environmental features and as such did not show any conflicts.

### 9.45 **SA suggestions**

It is important to make sure that all targets and recommendations set out in these options are met and realised to get the maximum benefits for both the natural and built environment.

### 9.46 **Alternative options**

For this SA, an alternative option of promoting the implementation of Level 4 of the Code of Sustainable Homes by 2013 (in accordance with Policy statement called Building a Greener Future) was discarded as this would not allow the industry to progress systematically on such targets. In fact, it would demand a big jump from Level 4 by 2013 to Level 6 zero carbon by 2016 which will be much harder to achieve.

In all circumstances, it is expected that flood and waste issues are dealt with.

## 9.5.4 **Building a Sustainable Community**

9.47 The strategic policy options included and appraised under this theme are as follows:

- Accessibility
- Parking requirements
- Transport infrastructure improvements
- Freight
- Improving design for Lewisham
- Preserving Lewisham's historic environment
- The location for tall buildings
- Strategic and local views, landmarks and panoramas
- Lewisham's river and waterways network
- Community and recreational facilities



- Delivering educational achievements
- Healthy lifestyles and healthcare provision
- Planning Obligations and
- Community Infrastructure Levy.

#### 9.48 Key benefits identified through the SA process

##### Socio-Economic

- The options will contribute in reducing the need to travel which will address existing local air quality and noise pollution issues in the borough and therefore impacting on the quality of life of residents (SA Objective 7).
- Promoting walking and cycling routes and controlled parking will also contribute to the health and wellbeing objective. The options are likely to contribute towards the efficient use of natural resources by reducing car travel and promoting public transport (SA Objectives ,4, 6, 7).
- Promoting and following maximum standards of parking set out in the London Plan would discourage people from travelling by car (SA Objective 7).
- Good transport links to the neighbouring boroughs and London can enhance business activity which could contribute to the existing economy (SA Objectives 2, 7).
- Enhancements and improvements to the historic environment, strategic and local views, landmarks and panoramas will provide benefits to the local residents and helps in promoting a sense of identity (SA Objectives 10,11).
- To support the existing and predicted future growth, there is a need of various infrastructure facilities (education, health, community and leisure, recreation) and it is vital that the Council delivers at least the minimum requirements to ensure current needs are met (SA Objectives 13, 14, 15, 18).
- Plans for community and recreational facilities is positive for the whole community and will improve on the existing quality of life of residents and contribute to community well-being (SA Objectives 12, 14, 16, 17, 18).

##### Environmental

- To locate and build new stock of housing and employment in high PTAL areas and improve the PTAL across the whole borough would address accessibility and connectivity issues (SA Objective 7).
- Plans for transport infrastructure improvements and promoting sustainable modes such as walking and cycling will help in mitigating climate change by reducing CO2 emissions, reducing air and noise pollution. It will also enhance the quality of existing open spaces and biodiversity in the borough (SA Objectives 6, 7, 8).
- The freight option can benefit the local economy but at the same time it could have some negative impact on air or water quality or could interrupt the ecological features/ aquatic life due to the disturbances created by such means of transport. Similarly, the improvements along river corridors could improve the quality of water and physical environment (SA Objectives 6, 7, 8).

#### 9.49 Key conflicts identified through the SA process

##### Socio-Economic

- Tall buildings could have some negative impact on strategic and local views, or if placed next to the river, could impact negatively to the aquatic life. The creation of wind tunnels would be a negative impact (SA Objectives 6, 7, 8).
- The use of natural resources, and the impact of flooding and climate change, depends upon aspects related to implementation. Therefore the implementation of each policy option is critical to achieve the environmental aspirations set out in the Core Strategy Options Report. Some temporary effects on the natural environment are identified resulting from construction, which can be prevented through the implementation of schemes such as the Considerate Constructors Scheme, Code of Construction or ISO 14001 or securing improvements through Section 106 (SA Objectives 6, 7, 8).
- Any negative impact on the people and natural environment with regard to building and implementation of tall buildings must be considered (SA Objective 10).
- However, due to limited land resource, there could be some effect on finding sufficient land resource to fit in all kind of different infrastructure facilities. CIL and Section 106 will act as a tool to secure such provisions (SA Objective 18).

#### 9.50 SA Suggestions

It is important to ensure that the land use choices that are made achieve the maximum benefit for the whole community. Striking a balance between delivering employment and retail targets and other land uses is a must. New development must reduce and mitigate the impacts of flooding and mitigation measures, especially if construction is taking place in areas identified in the Strategic Flood Risk Assessment as vulnerable to flooding.

#### 9.51 Alternative options

No alternatives were put forward against promoting good design as this would repeat national and regional policy.

For community services, it was proposed to locate such facilities across the borough which will be further developed through the preparation of the draft Core Strategy and the Council's work relating to infrastructure planning.

## **10. Cumulative and short-medium term effects**

- 10.1 Cumulative impacts refers to the total or combined impacts or effects arising from the implementation of the strategic spatial options or each particular policy option. The impact or effect can be negative or positive.
- 10.2 For example, if a housing development is proposed with associated transport improvements, then this is likely to address both housing and transport issues. This can benefit the wider community and contributes towards making the development more sustainable. On the other hand, an increase in the number of homes in an area is likely to place pressure on the existing reserve of natural resources and the demand and accessibility to local and regional infrastructure.

### **10.1 Methodology**

- 10.3 Identifying the cumulative impacts of the Core Strategy Options Report is a complex process and various methods and techniques have been identified in the SA guidance to carry out this exercise. Lewisham has adopted a matrix approach to assess cumulative impacts in order to provide a clear visual summary. The exercise was broken down into two stages.
- 10.4 The first stage involved a cumulative impact assessment for each policy option put forward. This can be found in Appendix 6.
- 10.5 The second stage involved a cumulative assessment of the effects identified for each theme in the first stage. The summary can be found in Appendix 7.

### **10.2 Assessment findings**

- 10.6 What follows is a summary of the results of this assessment, as it impacts each SA objective.

#### **Economic**

- 10.7 The assessment shows a positive impact on the economic objectives. The proposed strategy is considered to encourage sustainable growth by promoting and generating local opportunities for the wider community. However, SA Objectives 1 and 2 are likely to compete with other land uses such as housing or open space due to the limited available land supply, which needs to be used to meet all the needs of existing and future residents.

#### **Environmental**

- 10.8 The environmental objectives promoting a range of issues such as the efficient use of natural resources, the provision of open space and other landscape and townscape enhancements, and mitigating the effects of climate change and flooding, are very much dependent on how the development process (from the design stage to the development stage) takes account and implements such considerations. Additionally, the day to day role of residents, businesses and the wider community to achieve the objective outcomes must not be underestimated.
- 10.9 The design and location of development will be of critical importance to reduce the consumption of natural resources and reducing the need to travel, particularly by private car.

The role of planning obligations or a Community Infrastructure Levy can be used to secure a financial contribution or works for environmental improvements.

### **Social**

- 10.10 Providing sufficient and quality housing, additional local employment opportunities and improved infrastructure facilities, is likely to improve the health and well-being of the community. This is likely to address deprivation issues, crime and social exclusion by providing a mix of housing types to meet need, places for social cohesion and sports and educational infrastructure that will help in engaging people in all sorts of various activities.
- 10.11 Again, the SA objective to promote housing is likely to compete with other land uses such as employment or open space due to the limited available land supply, which needs to be used to meet all the needs of existing and future residents.

### **10.3 Proposed mitigation measures**

- Robust implementation of policies must be ensured to achieve the desired vision and goals.
- It is important to ensure that the land use choices that are made achieves the maximum benefit for the whole community.
- It is important to secure and deliver the necessary infrastructure facilities to support the existing and future demand predicted from increasing growth in the borough.
- New development must take into account the risks involved in developing on areas of high risk of flooding and consider alternatives and mitigation measures to reduce and mitigate the impact.

## 11. Proposals for monitoring

- 11.1 The evidence of how the SA objectives are being affected can only be detected by looking at evidence of how economic, environmental or social circumstances are changing in the borough over time. It is proposed that the effects of the objectives will be assessed using the monitoring framework provided in Appendix 8.
- 11.2 Appendix 8 details the objective, appropriate indicators, frequency and period of monitoring and any targets that have been set. These are closely linked to the indicators of the Annual Monitoring Report, the monitoring framework of the core strategy and other local or regional plans such as the Biodiversity Action Plan and the Local Implementation Framework, to ensure consistency and accuracy of data.
- 11.3 Future monitoring should particularly have regard to objectives which have shown to be most effected by the core strategy and are considered to be the following:
- waste management
  - water consumption
  - traffic flow
  - air quality
  - open space
  - energy consumption
  - housing provision
  - employment levels
  - crime and
  - developments in flood risk areas

These issues should be investigated and provided with a continuous and robust set of data. This will ensure that resources are directed towards areas that are of most concern and in need of improvement.

## 12. Next steps

- 12.1 Following a period of consultation on the Core Strategy Options Report and this Sustainability Appraisal, a draft Core Strategy document will be prepared along with a further Sustainability Appraisal.
- 12.2 The SA adoption statement will be published to demonstrate how environmental and sustainability considerations have been integrated in to the plan making process.
- 12.3 How to comment on the report

You can tell us what you think about any part of this Sustainability Appraisal report.

Comments must be in writing and can be made in any of the following ways:

### **Web**

Ideally we would like you to provide your comments on-line against the relevant section at the following address:

<http://consult.lewisham.gov.uk/portal>

### **Post**

Planning Policy  
London Borough of Lewisham  
5th Floor, Laurence House  
1 Catford Road  
Catford, SE6 4SW

### **E-mail**

[planning@lewisham.gov.uk](mailto:planning@lewisham.gov.uk) with 'LDF Core Strategy SA Report' as the subject.

## Appendix 1 - Compliance with the SEA Directive/Regulations

This SA report incorporates the European requirements to undertake a Strategic Environmental Assessment. The following table signposts the requirements of Article 5(1) of the European Union Directive 2001/42/EC that are being met in this document, and where they were met in previous SA reports.

Summary of the SEA requirements	Where covered		
	This SA report	SA report 2007 (Preferred Options)	Scoping Report 2005
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):			
a) An outline of the contents, main aims of the plan, and relationship with other relevant plans, policies, and programmes.	5.1	3.2	4.0
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	5.2	4.2	5.0
c) The environmental characteristics of areas likely to be affected.	5.2 & 6.2	4.2	5.0
d) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	6.1	4.3	6.0
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental, considerations have been taken into account during its preparation.	7.0	4.1	7.0
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage, landscapes and the interrelationships between the above factors.	9.0	6.1	NA

Summary of the SEA requirements	Where covered		
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan	10.3	6.3 & 7	NA
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	1.3 and 9.4	2, 5.2 & 6	NA
i) A description of measures envisaged concerning monitoring in accordance with Article 10	11.0	7.2 & 8.2	NA
j) A non-technical summary of the information provided under the above headings	1.0	1.1	NA
The report must include the information that may reasonably be required taking C into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	<b>This latter stage will be undertaken during and after the consultation period on the Core Strategy Options Report 2008</b>		



## Appendix 2 - Appropriate Assessment

### 1. Introduction

- 1.1 The EU Habitats Directive<sup>51</sup> requires the Council to undertake an assessment<sup>52</sup> of the implications of a proposed plan or project on designated European sites<sup>53</sup>. This is to ensure that the integrity of these sites are protected through the planning process. The assessment must be appropriate to its purpose under the Habitats Directive - hence the title Appropriate Assessment or AA.
- 1.2 In the context of the Local Development Framework (LDF), all Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) are subject to the Habitats Directive and are the subject of this AA. This includes the Core Strategy.
- 1.3 This report has been prepared having regard to draft guidance issued by the Department for Communities and Local Government<sup>54</sup> on undertaking AAs<sup>55</sup>. This suggests the following three stage process:
  - Stage 1 - Assess the Likely Significant Effects (screening)
  - Stage 2 - Appropriate Assessment and ascertaining the effect on site integrity and
  - Stage 3 - Mitigation measures and alternative solutions.
- 1.4 This report concludes that the Core Strategy is not likely to have significant effects on designated European sites. As such, only Stage 1 (screening) is required to be undertaken and is therefore the subject of this report.
- 1.5 Following consultation on this AA and the Core Strategy Options Report, a further AA will need to be prepared for the draft Core Strategy, and a final AA will be prepared and submitted for examination alongside the final Core Strategy.

### 2. Stage 1 – Assess the likely significant effects (Screening)

- 2.1 Stage 1 seeks to determine if the Core Strategy is likely to have a significant effect on any designated European site. This process will determine if subsequent stages of the AA need to be undertaken (i.e. if no likely significant effects are identified then the assessment is complete).

#### 2.1 Identification of relevant sites

- 2.2 There are no designated European sites within the London Borough of Lewisham. The following European sites have been identified as being within 15 km of the borough boundary and are considered to be in close enough proximity to *potentially* be impacted on and therefore necessary to be considered as part of the AA.

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<sup>51</sup> Council Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora

<sup>52</sup> It is noted that the AA is a separate (but complimentary) activity to the Sustainability Appraisal which will need to be undertaken for all LDF documents

<sup>53</sup> European sites are classified as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Sites (OMS)

<sup>54</sup> Planning for the Protection of European Site: Appropriate Assessment, DCLG (August 2006)

<sup>55</sup> This AA has also had been prepared having regard to the Appropriate Assessment undertaken for the Draft Further Alterations to the London Plan (Sept 06) prepared by Forum for the Future

Table 2.1 – Designated European Sites within 15 km of LB Lewisham<sup>56</sup>

Site Name	Site Designation	Site Ref. No
Lee Valley	Special Protection Area	UK9012111
Richmond Park	Special Areas of Conservation	UK0030246
Wimbledon Common	Special Areas of Conservation	UK0030301
Epping Forest	Special Areas of Conservation	UK0012720

## 2.2 Site descriptions and characteristics

2.3 Appendix 2 provides a detailed overview of each designated site, including their characteristics, qualifying habitats / species, and vulnerability. This information highlights the importance of the Lee Valley and Epping Forest sites for their habitats of Atlantic acidophilous beech forests but also the vulnerability of these sites from pollution. All sites are of importance for their species of Stag beetle - *Lucanus cervus* - whilst Richmond Park and Wimbledon Common were highlighted as being in urbanised areas and vulnerable to recreational pressures.

## 2.3 Other plans and projects – key trends and directions

2.4 In considering the likely significant effects of the Core Strategy on designated European sites, the cumulative impact of other plans and projects in addition to the Core Strategy need to be considered.

2.5 The plans and projects of all other London boroughs (in particular, their LDF's) are all relevant but in practise the London Plan, as the overriding Regional Spatial Strategy for London, encompasses their directions at a strategic level. Other plans and projects considered to be of potential interest such as those of Transport for London and the London Development Agency are also accommodated as part of the London Plan. As such, it is considered that the London Plan is the key plan which will be assessed along with the Core Strategy to ascertain key trends and directions for the purpose of this AA.

2.6 It is considered that for the purposes of this AA, the key overriding provision in the London Plan, and the plans and programs of other London Local Planning Authorities, is the requirement that London will accommodate an additional 305,000 additional homes between 2007/08 to 2016/17, of which Lewisham must provide 9,750.

2.7 The Sustainability Appraisal of each of the Core Strategy has explored other plans in more detail and has been used as relevant background material for this AA.

## 2.4 Assessment methodology used

2.8 Having ascertained the designated European sites of relevance to this AA, it is necessary to assess each strategic spatial option and the policy options contained in the Core Strategy for the likely impact (if any) they will have on the site.

<sup>56</sup> Sources:- Joint Nature Conservation Committee ([www.jncc.gov.uk](http://www.jncc.gov.uk)) and [www.magic.gov.uk](http://www.magic.gov.uk)

- 2.9 This assessment has been undertaken generally in accordance with the methodology outlined in draft guidance issued by Natural England<sup>57</sup> but adapted where necessary. Whilst this guidance relates specifically to regional spatial strategies (e.g. the London Plan) it is considered sufficiently robust to be utilised for this AA. It is noted that the guidance defines 'likely' as meaning 'probably, not merely a fanciful possibility'.
- 2.10 For each option, the following tests will be used to assess the likely significant effects on each policy in the LDF documents. This will help establish if a policy will have no effect, could have an effect, or is likely to have an effect on a designated European site.

Table 2.2 – Assessment Tests<sup>58</sup>

Reason why options will have <b>no</b> effect on European Sites	
1	The policy is not in itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
2	(Test 2 in the guidance only applies to regional spatial strategies and is therefore not applicable to the assessment of the Core Strategy)
3	(Test 3 in the guidance only applies to regional spatial strategies and is therefore not applicable to the assessment of the Core Strategy)
4	Concentration of development in urban areas will not affect European sites and will help steer development and land use change away from European sites and associated sensitive areas.
5	The policy helps to steer development away from a European site and associated sensitive areas.
6	The policy is intended to protect the natural environment, including biodiversity.
7	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European site.
Reason why policy <b>could</b> have a potential effect on European Sites	
8	The document steers a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site.
Reasons why policy would be <b>likely</b> to have a significant effect on European Sites	
9	The policy makes provision for a quantum or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site.

- 2.11 Those policies (or options) which could have an effect (as shown in 8 in Table 2.2) will need to be further considered in this scoping stage of the AA and those policies (or options) that would be likely to have a significant effect (as shown in 9 in Table 2.2) will need to be subject to Stage 2 and 3 of the AA.

- 2.12 The assessment tables can be found in section A3.1.

<sup>57</sup> The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the provisions of the Habitats Regulations (2006), Tyldesley and Associates

<sup>58</sup> Adapted from the Assessment of Regional Spatial Strategies and Sub Regional Strategies under the provisions of the Habitats Regulations (2006), Tyldesley and Associates.

## 2.5 Assessment Outcomes

2.13 The assessment of each policy (or option) contained in the Core Strategy has shown that the options are not expected have a potential effect and no option is expected to have a significant effect on a designated European site.

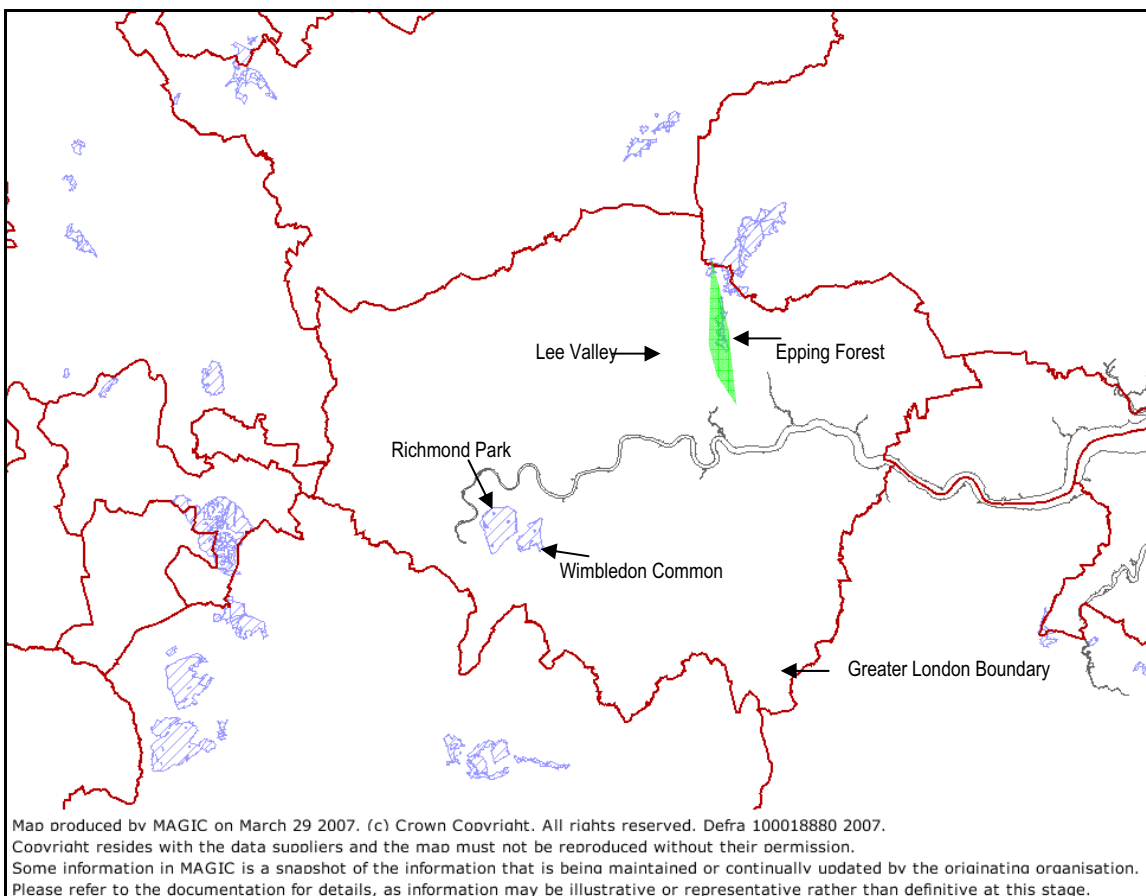
## 3. Conclusion

3.1 This report identified four European sites of interest to the AA (see Appendix 1) and the key characteristics of each site have been recorded (see Appendix 2). Further, the Core Strategy Options report has been assessed against a standard criteria (see Appendix 3) to determine their effect on the European sites (if any).

**The conclusion of this assessment is that no options have been found to have a likely significant effect on any designated European sites.**

3.2 Given the above conclusion, there is no need or requirement to continue to Stage 2 or 3 of the AA. This report will be up-dated and amended (as required) following consultation on the Core Strategy Options Report and to take into account any changes which may be made to the document prior to the draft being prepared for a further round of public consultation.

### Designated European Sites within 15 km of Lewisham



(Source:- part [www.magic.gov.uk](http://www.magic.gov.uk) and part LB Lewisham)

Site Name	Site Designation	Site Ref. No
Lee Valley	Special Protection Area	UK9012111
Richmond Park	Special Areas of Conservation	UK0030246
Wimbledon Common	Special Areas of Conservation	UK0030301
Epping Forest	Special Areas of Conservation	UK0012720

### Site Descriptions and Characteristics

The following are detailed site descriptions and characteristics of the four designated European sites which are considered in this report. All information is sourced from the Joint Nature Conservation Committee ([www.jncc.gov.uk](http://www.jncc.gov.uk)).

#### Lee Valley SPA (447.87 ha)

##### General Site Character

- Inland water bodies (standing water, running water) (67%)
- Bogs. Marshes. Water fringed vegetation. Fens (4.0%)
- Humid grassland. Mesophile grassland (8.0%)
- Improved grassland (10.0%)
- Broad-leaved deciduous woodland (10.0%)
- Other land (including towns, villages, roads, waste places, mines, industrial sites (1.0%)

##### Qualifying Habitats

n/a

##### Qualifying Species

- Bittern *Botaurus stellaris*
- Gadwall *Anas strepera*
- Shoveler *Anas clypeata*

The Lee Valley SPA is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris*.

##### Vulnerability

The whole area is affected by rather eutrophic water quality; but this is to be addressed via AMP3 funding under the Urban Waste Water Treatment Directive. The other main threat is that of human recreational pressure, but this is already well regulated through zoning of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority.

There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought. This will be addressed through the Environment Agency review of consents. The threat from potential development pressures in this urbanised and urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994).

## **Richmond Park SAC (846.68 ha)**

### General Site Character

- Inland water bodies (standing water, running water) (1.5%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.5%)
- Heath. Scrub. Maquis and garrigue. Phygrana (25%)
- Dry grassland. Steppes (18%)
- Humid grassland. Mesophile grassland (5%)
- Improved grassland (20%)
- Broad-leaved deciduous woodland (25%)
- Mixed woodland (5%)

### Qualifying Habitats

n/a

### Qualifying Species

- Stag beetle *Lucanus cervus*

Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.

### Vulnerability

The site is surrounded by urban area and therefore experiences high levels of recreational pressure.

## **Wimbledon Common SAC (348.31 ha)**

### General Site Character

- Inland water bodies (standing water, running water) (1%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.5%)
- Heath. Scrub. Maquis and garrigue. Phygrana (5%)
- Dry grassland. Steppes (45%)
- Improved grassland (3.5%)
- Broad-leaved deciduous woodland (45%)

### Qualifying Habitats

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

The above habitats are a qualifying feature, but not a primary reason for selection of this site.

### Qualifying Species

- Stag beetle *Lucanus cervus*

Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and a relatively large number of records were received from this site during a recent nationwide survey for the

species (Percy et al. 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.

### Vulnerability

The site is located in an urban area and therefore experiences heavy recreational pressure.

## **Epping Forest SAC (1,604.95 ha)**

### General Site Character

- Inland water bodies (standing water, running water) (6%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.2%)
- Heath. Scrub. Maquis and garrigue. Phygrana (3.8%)
- Dry grassland. Steppes (20%)
- Broad-leaved deciduous woodland (70%)

### Qualifying Habitats

- Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion)

Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss *Zygodon forsteri*. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

The above habitats are a qualifying feature, but not a primary reason for selection of this site.

### Qualifying Species

- Stag beetle *Lucanus cervus*

Epping Forest is a large woodland area in which records of stag beetle *Lucanus cervus* are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.

### Vulnerability

After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995. The forest's epiphytic bryophyte population had been declining due to the death of pollards, shading and pollution from acid rain. The reintroduction of pollarding and wood pasture management is helping to reverse the decline.

The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act.

There is an active policy to leave felled timber on the ground to increase the habitat for stag beetle and other saproxylic insects.

In 1988, the Corporation of London, who own and manage the forest, agreed a management strategy with English Nature to take forward the management outlined above. A comprehensive management plan was completed and consented in 1998.

The site is subject to the provisions of the Epping Forest Act of 1878.

### Assessment Tables

The following tables provide an assessment of each policy contained in the LDF documents according to the tests and methodology outlined in Section 2.4 of this report.

#### Assessment Tests<sup>59</sup>

Reason why policy will have <b>no</b> effect on European Sites	
1	The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
2	(Only applies to regional spatial strategies and is therefore not applicable to the assessment of the LDF documents)
3	(Only applies to regional spatial strategies and is therefore not applicable to the assessment of the LDF documents)
4	Concentration of development in urban areas will not affect European sites and will help steer development and land use change away from European sites and associated sensitive areas.
5	The policy will help to steer development away from a European site and associated sensitive areas.
6	The policy is intended to protect the natural environment, including biodiversity.
7	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European site.
Reason why policy <b>could</b> have a potential effect on European Sites	
8	The document steers development a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site.
Reasons why policy would be <b>likely</b> to have a significant effect on European Sites	
9	The policy makes provision for a quantum or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site.

<sup>59</sup> Adapted from the *Assessment of Regional Spatial Strategies and Sub Regional Strategies under the provisions of the Habitats Regulations* (2006), Tyldesley and Associates



### A3.1 Core Strategy Options Report

Option No.		Assessment	Impact	Recommendations
1	Strategic Spatial Option 1 – Borough-wide regeneration and growth	4	No	None
2	Strategic Spatial Option 2 – Meeting national and regional requirements	4	No	None
3	Housing provision	4	No	None
4	Affordable housing threshold	1	No	None
5	Housing tenure	1	No	None
6	Housing mix	1	No	None
7	Lifetime homes	1	No	None
8	Accessible housing	1	No	None
9	Gypsies and travellers	5	No	None
10	Strategic employment locations	5	No	None
11	Locally significant employment areas	5	No	None
12	New and growing business and industrial sectors	5	No	None
13	Convoys Wharf	5	No	None
14	Other employment locations	5	No	None
15	Retail Hierarchy	5	No	None
16	Location of retail development	5	No	None
17	Lewisham and Catford town centres	5	No	None
18	Vitality and viability	1	No	None
19	Environment and design	1	No	None
20	Accessibility	1	No	None
21	Local shopping facilities	5	No	None
22	Climate change and adapting to the effects	1	No	None
23	Sustainable design and construction and energy efficiency	1	No	None
24	Managing and mitigating the risk of flooding	7	No	None
25	River and waterways network	7	No	None
26	Open space provision	7	No	None
27	Open space provision	7	No	None
28	Biodiversity	7	No	None
29	Waterways naturalisation	7	No	None
30	Character and design of open space	1	No	None
31	Addressing Lewisham's waste requirements	5	No	None
32	Accessibility	1	No	None
33	Parking requirements	1	No	None
34	Transport infrastructure improvements	1	No	None
35	Freight	1	No	None
36	Improving design for Lewisham	1	No	None
37	Preserving Lewisham's historic environment	7	No	None

Option No.		Assessment	Impact	Recommendations
38	The location of tall buildings	1	No	None
39	Strategic and local views, landmarks and panoramas	1	No	None
40	Lewisham's river and waterways network	7	No	None
41	Community and recreational facilities	1	No	None
42	Delivering educational achievements	1	No	None
43	Healthy lifestyles and healthcare provision	1	No	None
44	Planning Obligations	1	No	None
45	Community Infrastructure Levy	1	No	None

### Appendix 3 - Compatibility matrix of SA objectives

- √ Compatible
- X Not compatible
- 0 Neutral

SA Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
<b>1. Economic growth</b>	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
<b>2. Employment</b>	√	X	X	0	X	X	√	√	X	0	X	X	√	√	0	√	√	√
<b>3.Waste</b>	√	X	√	√	√	√	0	√	0	√	0	x	0	0	0	0	√	0
<b>4. Natural resources</b>	√	X	√	√	√	√	√	√	√	0	0	x	0	0	0	0	0	0
<b>5. Open spaces and biodiversity</b>	√	X	√	√	X	√	√	√	√	√	0	X	√	0	0	0	√	√
<b>6. Air quality, noise and vibration</b>	√	X	√	√	√	√	√	√	0	√	√	√	√	0	0	0	√	0
<b>7. Sustainable transport</b>	√	√	√	√	√	√	√	√	√	√	√	√	√	0	0	0	√	√
<b>8. Climate change</b>	√	X	√	√	√	√	√	√	√	√	√	x	√	0	0	0	√	0
<b>9. Flood risk</b>	√	x	√	√	√	√	√	√	√	√	√	X	√	0	0	0	√	0
<b>10. Landscapes and Townscapes</b>	√	0	√	0	√	√	√	√	0	√	√	0	√	0	0	0	√	0
<b>11. Historic env. and archaeological aspects</b>	√	0	√	0	√	√	√	√	0	√	√	0	√	0	0	0	√	0
<b>12. Housing</b>	√	X	x	0	x	√	√	x	X	0	X	√	√	√	0	√	√	0
<b>13. Health</b>	√	√	√	√	√	√	√	√	√	√	√	√	√	√	0	0	√	√
<b>14. Poverty and social inclusion</b>	√	√	0	0	0	0	0	0	0	0	0	√	√	√	√	√	√	√
<b>15. Education and skill levels.</b>	√	√	0	0	0	0	0	0	0	0	0	0	√	√	√	√	√	√
<b>16. Crime and anti-social behaviour</b>	√	√	0	0	0	0	0	0	0	0	0	0	√	√	√	√	√	0
<b>17. Community identity and welfare</b>	√	√	0	0	0	0	√	0	0	0	√	√	√	√	√	√	√	√
<b>18. Leisure facilities, infrastructure and local services</b>	√	√	√	0	0	0	√	0	0	0	0	√	√	√	√	√	√	√

## Appendix 4 - Assessment of the Core Strategy strategic objectives

### Key to Symbols

++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
I	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

Core Strategy Options Strategic Objectives	Sustainability Objectives																	
	SA objective 1	SA objective 2	SA objective 3	SA objective 4	SA objective 5	SA objective 6	SA objective 7	SA objective 8	SA objective 9	SA objective 10	SA objective 11	SA objective 12	SA objective 13	SA objective 14	SA objective 15	SA objective 16	SA objective 17	SA objective 18
<b>Regeneration</b>																		
Facilitate development	++	++	-	-	-	-/+	-	-	-	-	-	-	+	++	0	0/+	+	-
<b>Providing Homes</b>																		
Meet local housing need	+	-	-/0	-	-/0	-	-	-	-	-	-	++	+	+	0	0/+	+	0
<b>Growing the Local Economy</b>																		
Increase local employment and training opportunities	++	++	0	0	?/0	0	0	0	0	0	0/-	0	+	+	0	+	+	0/?
<b>Environmental Management</b>																		
Climate change	+	0	++	++	++	++	++	++	++	0	0/+	0	++	0	0	0	0	0
Flood risk	+/0	0	+/0	0	0	0	++	++	++	0	+/0	0	+	0	0	0	+/0	0
Open spaces and environmental assets	+	-	+/0	+/0	++	+/0	0	+	+/0	+	+	-	++	0	0	0	+	+/0
Waste management	+/-	-	++	++	+/0	0	0	+	0	?	0	-	+/0	0	0	0	+/0	+/0
<b>Building a sustainable community</b>																		
Transport and accessibility	++	+	0	++	+	+/-	++	++	+	+	+	0	++	0	0	0	0	++
Safety	+	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	+	0
Social infrastructure	+	+/-	-	-/0	0/+	0/+	0/+	-/0	0	0	0	-/0	++	+	+	+	++	++
Protect and enhance Lewisham's character	0	0	0	0	+	+	0	0	0	++	++	0	+	0	0	0	+/0	0

## Appendix 5 - Assessment of the Strategic Spatial Options

### Key to Symbols

++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
I	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

## Strategic Spatial Option 1

SA Objectives		Option 1: Borough-wide regeneration and growth	
	Performance	Commentary	
To encourage sustained economic growth	++	Likely to promote sustained economic growth by attracting further investment. Employment focussed on economic growth sectors suitable to the borough as identified in the Employment Land Study 2008. Proposals for mixed use employment development and the associated provision of job opportunities, housing and other infrastructure facilities will improve economic conditions particularly in Deptford and New Cross. The retention throughout the borough of existing locally significant employment locations will encourage sustainable economic growth as will retail growth in designated town centres.	
To encourage and promote employment and new enterprises in Lewisham	++	Likely to generate an increase in job and training opportunities as employment is focussed in growth areas such as business support. This option has the potential to contribute up to 100,000 sq.m. of business employment equal to approximately 6,000 additional jobs in this sector, as identified in the Employment Land Study 2008. The provision of new job and training opportunities will open up new opportunities for the local population, particularly important in areas of high deprivation. Retail growth will contribute to employment.	
To minimise the production of waste and increase waste recovery and recycling	-/+	There is a possibility of an increase in waste generation with an increase in population and associated development. The local waste strategy of reduce, reuse and recycle will have an impact and is designed to improve the amount of waste recycled. The strategy will safeguard sufficient sites to process the boroughs waste and deal with the proportion outlined in the London Plan (323,000 tonnes by 2020). It will also make sure that sustainable construction techniques are in place. The quantum of residential development, particularly in the New Cross and Evelyn wards presents the opportunity for a waste to energy scheme provided by SELCHP.	
To ensure the efficient use of natural resources		Population pressures and regeneration plans will put pressure on the existing reserve of natural resources such as land, water, fuel etc. However, this option relies on the reuse of brownfield sites and locates higher density homes in areas with good public transport. It also requires the efficient use of natural resources at the operation and construction phase of development and the use of energy efficient and renewable technology as part of any development.	
To maintain and enhance open space, biodiversity, flora and fauna	+/-	This option proposes to safeguard existing open space and improve its quality as well as increasing the amount of open space in the borough through on-site provision at large redevelopment sites. Proposals to naturalise the river Ravensbourne will be achieved. The inclusion of 'living roofs and walls' and landscaping in new development will enhance biodiversity. However, threats may arise through population growth and development pressures, particularly on derelict or vacant sites.	

SA Objectives		Option 1: Borough-wide regeneration and growth	
	Performance	Commentary	
To improve air quality and reduce noise and vibration	-	Increase in population and other regeneration activities will put additional pressures on existing air and noise quality in the borough. Large development sites are located with an AQMA. Construction activities may create some nuisance to neighbours. However, this option does involve unneighbourly uses being relocated to improve the quality of adjacent residential areas.	
To reduce car travel and improve accessibility by sustainable modes of transport	++	Wider regeneration opportunities through mixed use employment development provide the potential to improve PTALs in the Evelyn ward. Accessibility will be improved through better pedestrian and cyclists connections reducing severance in Evelyn and New Cross wards. Reduced car parking in residential development can be promoted in areas with higher PTALs.	
To mitigate and adapt to the impact of climate change	+/-	Reduction in the use of cars and proposals to improve the public transport infrastructure will contribute positively to the climate change agenda. However, the growth pressures are likely to negatively influence natural resources. Redevelopment in areas liable to flood is also an issue addressed in the SFRA (see below). The quantum of residential development, particularly in the New Cross and Evelyn wards presents the opportunity for a waste to energy scheme provided by SELCHP.	
To minimise and mitigate flood risk		The Strategic Flood Risk Assessment identifies some of the mixed use employment development sites as being located within Flood Zone 3A. This means a high probability of flooding and development may only be considered following application of the Sequential Test required by PPS 25. Having applied the sequential test these sites are considered acceptable for redevelopment. However, there will be a need for mitigation as part of the detailed design of individual buildings. It should also be recognised that these sites are protected by the Thames Barrier from flood risk. Policies will also reduce the amount of hard surfaces by requiring the provision of gardens, green roofs, SUDS etc.	
To maintain and enhance landscapes and townscapes	++	New development is likely to bring positive changes in the existing townscape and landscape of the borough. New buildings and surrounding spaces will raise the overall standard of design, environmental quality and improve permeability and accessibility in the whole borough but particularly in Evelyn and New Cross wards. Development will contribute to solving the problems of physical severance caused by railway viaducts and increase connectivity of these sites with the rest of the borough.	
To conserve and where appropriate enhance the historic environment and other archaeological aspects of the borough	+	New development will be required to enhance and compliment the existing historic and archaeological aspects of the borough, having regard to character appraisals. Detailed policies will be set out to achieve this.	



<b>Option 1: Borough-wide regeneration and growth</b>	
<b>SA Objectives</b>	<b>Performance</b>
	<b>Commentary</b>
To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home	++ This option makes substantial housing provision over the plan period. If all sites are implemented this could exceed the London Plan target by 40%. There is an identified need in the Strategic Housing Market Assessment for more homes which would be substantially met.
To improve the health and well being of the population	++ This option makes provision for more houses, jobs and social infrastructure facilities in areas of high deprivation. These aspects contribute towards good health and should make a positive impact on the well-being of residents. The protection of open spaces and improving leisure facilities will also contribute positively to the health of residents.
To reduce poverty and promote social inclusion	++ The provision of more jobs, homes and improving the quality and providing infrastructure will contribute positively to the reduction of poverty and help increase social cohesion in the borough. This option particularly targets the Evelyn and New Cross wards which have the highest levels of deprivation in the borough.
To provide for the improvement of education and skill levels	+ Other regeneration programmes such as the Building Schools for the Future will contribute towards this goal by improving or rebuilding all secondary schools in the borough. Promoting training opportunities with mixed use employment sites will also contribute to this objective.
To reduce crime, anti-social behaviour and the fear of crime	++ The place making agenda that is central to this option will require all new developments to take account of safer by design principles. It is anticipated that new homes and a greatly improved physical environment will contribute to a reduction in crime. The provision of more jobs, housing and other economic opportunities in areas that are highly deprived such as the New Cross or Evelyn wards is also expected to make a positive contribution to achieving this objective.
To encourage a sense of community identity and welfare	+ New development will contribute towards creating a sense of place, and local community identity.
To improve accessibility to leisure facilities, community infrastructure and key local services.	+ A key objective of this option is that the social infrastructure including schools, health and leisure facilities are provided along side the new homes. It also sets out to improve the status of the Lewisham Town Centre to that of metropolitan. This will involve new shops, leisure and other community facilities. Mixed use employment sites will address severance issues in the north of the borough.
<b>Summary</b>	Strong positive impacts for the economic and social objectives resulting in improvements to the north of the borough. Options 1 sees a 40% increase over London Plan housing requirements, reduces physical severance in the Evelyn and New Cross Wards and has the potential to improve PTALs, and creates places and improves connectivity. Issues relating to flood risk, air quality, waste and the use of natural resources will need to be mitigated through effective implementation.

## Strategic Spatial Option 2

SA Objectives		Option 2: Moderate regeneration and growth	
		Performance	Commentary
To encourage sustained economic growth		+/-	This option creates economic opportunities by increasing the retail offer for Lewisham and Catford and the places designated as District town centres. Strategic Industrial Locations (SIL) and Local Employment Locations (LELs). No change for SIL would mean little investment would take place in these areas and in all probability the industrial areas would continue to decline. No investment would mean that new jobs in employment growth sectors will not be attracted to the area and a decline in business floorspace is likely.
To encourage and promote employment and new enterprises in Lewisham		+/-	It will sustain and promote retail employment opportunities in the major town centres and support existing business firms in local employment locations. However, the failure to redevelop declining employment sites will mean that a wider economic base, as suggested in Lewisham Employment Land Study, will not be achieved.
To minimise the production of waste and increase waste recovery and recycling			This option produces less growth in jobs and homes so would likely result in less waste production. The key waste handling facilities would be protected as in Option 1. However, the implementation of a local waste strategy and waste policies would likely contribute towards reducing waste production and improving on recycling rates in the borough.
To ensure the efficient use of natural resources			Less population growth and regeneration opportunities would result in less pressure on natural resources. The proposed development would be on brownfield sites. However, the failure to redevelop SIL areas would not present the opportunities to use scarce land resources efficiently.
To maintain and enhance open space, biodiversity, flora and fauna		+/	Population growth will place pressures on the use and access to existing open spaces. Nevertheless, as with Option 1 the regeneration opportunities provide for the naturalisation of the River Ravensbourne near the Catford and Lewisham town centres. This is likely to enhance biodiversity and other flora and fauna aspects of the borough. Less residential development under Option 2 will result in less amenity open space provision and less S106 money to improve existing open spaces.
To improve air quality and reduce noise and vibration		-	Population growth and regeneration opportunities will place pressures on the existing air and noise quality of the borough. Construction activities may bring temporary vibration nuisance. Key development sites are still located within an AQMA albeit the quantum is less than Option 1.
To reduce car travel and improve accessibility by sustainable modes of transport		++	Denser development would be focussed in the larger town centres, particularly Lewisham, and Catford where PTALs are higher, thus impacting positively on climate change by reducing the need to travel and promoting sustainable modes of travel such as walking and cycling. This option seeks to build on transport improvements in the borough such as

<b>Option 2: Moderate regeneration and growth</b>	
	the extension of the East London Line, DLR capacity improvements, Thameslink and traffic improvements at Lewisham and Kender. The implementation of the LIP (Local Implementation Plan) will improve accessibility throughout the borough.
To mitigate and adapt to the impact of climate change	+/- The promotion of sustainable modes of travel will impact positively on climate change. However, growth pressures are likely to impact negatively on natural resources.
To minimise and mitigate flood risk	 The Strategic Flood Risk Assessment identifies some of the development sites in Catford and Lewisham as being located within Flood Zone 3A. This means a high probability of flooding and development may only be considered following application of the Sequential Test required by PPS 25. Having applied the sequential test these sites are considered acceptable for redevelopment.
To maintain and enhance landscapes and townscapes	+/- The character of the borough would largely be maintained with major physical change focussed in Lewisham and Catford. Redevelopment in these areas will enhance their character. Opportunities to radically improve the physical environment in the New Cross and Evelyn wards through site regeneration of industrial sites would be lost.
To conserve and where appropriate enhance the historic environment and other archaeological aspects of the borough	0/+ The borough's 25 conservation areas and many listed buildings would continue to be protected. Conservation Area character appraisals would ensure implementation. There is further scope to enhance and compliment the existing historic aspects of the borough through the regeneration opportunities provided with Option 2.
To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home	+ This option provides up to an additional 7,700 dwellings in Lewisham, Catford, Deptford and New Cross over the plan period. This is less than with Option 1 but would seek to meet the London Plan target for housing. The further need identified in the Strategic Housing Market Assessment would not be met.
To improve the health and wellbeing of the population	+ Improvements in transport, housing stock, job opportunities and accessibility to open space will contribute to the health and wellbeing of residents. PCT clinics and Lewisham University Hospital will continue to improve the health of the community in the borough. Social infrastructure that could be provided in relation to major redevelopment in Deptford would be limited.
To reduce poverty and promote social inclusion	+ The development and regeneration associated with this option would reduce poverty and improve social inclusion. However, there would not be the opportunities associated with Option 1 for improvements in Evelyn and New Cross wards. These two wards are amongst the poorest in the borough.

<b>Option 2: Moderate regeneration and growth</b>	
To provide for the improvement of education and skill levels	<p>+</p> <p>The Building Schools for the Future programme will see every secondary school rebuilt over the plan period. The other facilities associated with housing growth that provide the environment for improvements in education will be available but on a smaller scale in this option.</p>
To reduce crime, anti-social behaviour and the fear of crime	<p>+/-</p> <p>New development will take account of 'safer by design' principles which will have a positive impact. The wider aspects of improved housing and the provision of jobs may help in reducing crime, and the fear of crime in the borough.</p>
To encourage a sense of community identity and welfare	<p>+</p> <p>New development will contribute towards creating a sense of place, and local community identity. However, the opportunity for place shaping in Deptford will be lost.</p>
To improve accessibility to leisure facilities, community infrastructure and key local services.	<p>+</p> <p>New swimming pools for Forest Hill and Lewisham, as well as improvements to health facilities and schools, will increase provision.</p>
<b>Summary</b>	<p>The impacts relating to population growth and development will still place pressures on the environment, particularly on air quality, the use of open spaces and the consumption of natural resources, however the impact is less than Option 1 due to the lower quantum of development proposed. Option 2 meets the strategic housing targets set out in the London Plan, and enhances retail and employment opportunities in some part of the borough. However, the benefits of regeneration will not impact the most deprived wards of the borough and does not help to transform the employment base.</p>

## Appendix 6 - Assessment of the policy options

### Key to Symbols

++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
I	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments and any recommended changes	
<b>Housing</b>																				
<b>Policy Options</b>																				
Housing provision	-	-	1/0	1	-	-/1	1	1	1	1	1	+	+	+	0	+	-/1	0	Contributes to housing targets and need (community wellbeing). Due to limited land resources, exceeding housing target likely to impact the promotion of other land uses such as open spaces, or employment and retail opportunities. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flooding, impact on climate change - very much depends upon implementation. There could be some temporarily pollution nuisance during the construction phase.	
Affordable housing threshold	-/+	0	0	1	0	0	0	1	1	1	1	+	+	+	0	+/0	+/0	0	Will contribute to housing targets however implementation depends on economic viability. Likely to have positive impact on health and wellbeing. It could also lead to reducing crime, anti-social behaviour and promoting social inclusion and mixed and balanced communities within the borough.	
Housing tenure																			Will contribute to the housing targets and supports the SA objective of promoting sufficient housing of appropriate mix and tenure. Likely to promote social inclusion and wellbeing by meeting specific housing needs, influencing a reduction in crime.	
Housing mix	-/+	0	0	0	0	0	0	1	1	0/1	0	++	+	+	0	+/0	+/0	0/1	Will contribute to the housing targets and meet specific needs identified for the borough which will further contribute to the wellbeing of residents.	
Lifetime homes	-/+	0	0	0	0	0	0	1	1	0/1	0	++	+	+	0	+	+/0	0	Meets housing needs and lifetime homes targets. Will also contribute to the wellbeing of the residents of the borough.	

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments and any recommended changes	
<b>Housing</b>																				
Accessible housing	-/+	0	0	0	0	0	0	0	0/1	0	0	+	+	0	0	0	+	0	Likely to improve the wheelchair accessibility in new dwellings which will help in promoting health and wellbeing among the borough residents.	
Gypsies and travellers	-/+	0	0	0	0	0	0	0	0/	0	0	0	+/-	+	0	0	+	0	Allocating a site/s for gypsies and travellers likely to meet housing needs but its implementation is subject to meeting criteria listed in the option. Conflicts may arise.	
<b>Cumulative effects</b>	-/+	-/0	1/0	1/0	-/0	0/1	1/0	1	1	1	1/0	+	+	+	0	+/0	+/0	0/1		

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments and any recommended changes	
<b>Employment land</b>																				
Strategic Industrial Locations	+	++	+/-	-	0	-	+/-	0	-/0	0	0	-	-/+	+	0/1	-/+	?	1	Retaining areas at Surrey Canal Road contributes to both local and regional economy. Industrial uses will increase the proportion of industrial waste but at the same time promoting waste management facilities in the defined area likely to reduce impact. Likely to increase noise, traffic and air pollution of such locality.	
Locally significant employment areas	+	++	-	1	?/0	-/0	1	-/1	1	0/?	0/?	0	++	++	+	++	+	0	Likely to diversify economic base and helps in promoting sustainable economic growth. Warehouse activities likely to create transport movement which may further increase CO2 emissions in the atmosphere. It can also degrade the air quality of that particular area where such activities are promoted. Promoting creative industries likely to improve skill levels.	



Core Strategy Options	SUSTAINABILITY OBJECTIVES																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments and any recommended changes	
<b>Employment land</b>																				
New and growing business and industrial sectors	+	+	-		+/-	+/-	+/0	+/-				+/	+	+	+/0	+	+	+	+	Likely to diversify economic base. It will provide both social and economic benefits to the borough. Likely to generate more waste, increase in activity in the borough may add up to the existing air pollution and transport issues but at the same time it may help in improving in other parts of the borough being development concentrated in one part of the borough.
Convoys Wharf	+	+	-	-/+			+	-/+				+	+	+		+	+	+	+	Helps in meeting housing targets and regeneration. Provision of various services and improved links on site reduces travel needs. Use of redundant site contributes to efficient use of land. Impacts on climate change, natural resources, flooding depends on implementation.
Other employment locations	+	+	-		-/0	-					/0	0/-	+	+	0	+/0	+/0	+/0	+	Small pockets of employment locations in various parts of the borough will help creating a balance among the community in terms of job opportunities, economic growth.
<b>Cumulative effects</b>	+	+	-	?	-/	-/	+/-						+	+		+	+	+/0	+	



SUSTAINABILITY OBJECTIVES																			
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments and any recommended changes
<b>Retail and town centres</b>	+	++	-	-		-	-/	-/				0/-	+	+	0	+	+	+/-	Retail uses will contribute positively to the local economy by providing jobs and retains economic activity within borough. This will help reduce travel outside borough for shopping and retail purposes. However it could lead to some negative impacts on natural and physical environment by generating more waste and consuming natural resources.
<b>Policy Options</b>																			
Retail hierarchy																			
Location of retail development	+	+	-	-		+/-	+	+/		í	/0	0/	+	+	0	0/?	+	+	Ensures the need to travel is reduced and like uses are collocated.
Lewisham and Catford town centres	+	++	-	-		-						0	+	+	0	+	+	+	Proposes to transform Lewisham town centre into metropolitan status and improving the retail offer. This will help in reducing the number of trips outside the borough. It will also create and strengthen local employment and training opportunities promoting sustainable economic growth. There could be some negative impacts such as more waste and consumption of natural resources.
Vitality and viability	+	++	-	-		-				+		0	+	+	0	+	+	+	Creates a destination and retains economic activity. It will also help in enhancing the existing townscape.
Environment and design	+	++	-	-/						+/	+	0	+	0	0	+	+	+	Seeking good quality design and high quality environment likely to contribute positively on natural and physical environment.
Accessibility	+	++	-	-		-/	++	+/			0	0	+	+	0	+	+	+	It will help in promoting sustainable modes of transport and will help in improving air quality of the borough. It will also help in reducing CO2 emissions by reducing travel which will contribute to climate change.

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments and any recommended changes	
<b>Retail and town centres</b>																				
Local shopping facilities	+	+/-	0	0	0	0	0/?	0	0	0/?	0	0	+/-	+/0	0	+/0	+/0	0	Ensures sustainable communities by providing retail locally and reduces the need to travel.	
<b>Cumulative effects</b>	+	++	-	-	I	-/I	I	I	I	I	I	0	+	+	0	+	+	+		

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Climate change</b>																				
Climate change and adapting to the effects	+	-/I	+	+	+	+	++	++	++	0	0	I	+	0	0	0	0	0	Makes a positive contribution to most of the SA objectives if implemented effectively. It will help in reducing CO2 emissions, flooding, local air quality, travel needs and improving upon the efficient use of natural resources.	
<b>Policy Options</b>																				
Sustainable design and construction and energy efficiency	+	+/I	+	+	+	+	0	++	++	0	0	+/I	+	0	0	0	0	0	If implemented effectively, will help in improving design through demanding tougher standards of code of sustainable/BREEAM standards and other measures set out in this option. This will also improve the life of new development.	
Local air quality	+	+/I	+	++	+/I	+	0	0	0	++			+	0	0	0	0	0	Positive impacts on health and economic activity. Implementation crucial.	
<b>Cumulative effects</b>	+	I	+	+	+	+	++	++	++	0	0	I	+	0	0	0	0	0		

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Waterways and flooding</b>	+																			
<b>Policy Options</b>																				
Managing and mitigating the risk of flooding	+	I	+/0	+	+	0	0	++	++	0	+	I	+	0	0	0	+	0		If implemented effectively then likely to reduce the risk of flooding. It will also contribute to sustainable economic growth and reducing the risk to the built environment and the community. Could have some indirect benefits such as improving use of natural resources especially water, and enhancing biodiversity. Should include 'living roofs and walls'.
River and waterways network	+/0	I	0	0/+	++	+	0	+/0	+	+	+	I	++	+/0	0	+	+	0/+		Reducing and mitigating the risk of flooding. Improving river frontages likely to have a positive impact on the quality of life and natural and physical environment of the borough. It will provide leisure facilities and an opportunity for social cohesion which will promote social inclusion. More activity and accessibility in and around likely to reduce fear of crime.
<b>Cumulative effects</b>	+	I	0	+	+	0/+	0	+	+	+/0	+	I	+	0	0	0/+	+	0		

SUSTAINABILITY OBJECTIVES																			
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes
Open space and biodiversity	0	I	0	0	++	+/0	0	+	0	+	0	I	+	0/+	0	0	+	+	
Policy Options																			
Open space protection																			Protection of existing open spaces will help in maintaining biodiversity. It may help in promoting social inclusion in the borough by providing opportunities for social activities. Open spaces can help in mitigating climate change and improving air quality. Could have some conflicts with other land uses such as employment or housing due to limited land availability. With increasing population growth, there is a pressure on existing open spaces and per capita of open space likely to be reduced due to high density housing.
Open space provision	0	I	0	0	++	+	0	+	0	+	0	I	+	+	0	0	+	+	Providing new open spaces will help reduce pressure on existing facilities and help in meeting demand. It will also enhance biodiversity and aesthetics. Due to existing development pressures, there could be some conflicts with other land uses. This could be resolved by providing onsite facilities for any new major development scheme.
Biodiversity	0	I	0	0/+	++	+/0	0	+	+	+/0	0	I	+	0	0	0	0/+	0	This will not only enhance the existing biodiversity but will improve aesthetics. Likely to reduce flooding risk by absorbing rainfall and negative impacts of climate change.
Waterways naturalisation	0	I	0	0	+	0	0	+	+	0	0	I	+	0	0	0	0	0	River naturalisation will help in mitigating flooding. Will also help in improving the river quality and natural and physical environment of the borough.
Character and design of open space	0	I	0	0	++	+	0	+	0	+	0	I	+	+	0	0	+	+	Will help in reducing crime and fear of crime by improving accessibility and the use of physical spaces. Will help in enhancing the existing townscape.
Cumulative effects	0	I	0	0	++	+/0	0	+	0/+	+	0	I	+	0/+	0	0	+	+	

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Waste</b>																				
<b>Policy Options</b>																				
Addressing Lewisham's waste requirements	+/-	-/0	++	+	+/-	+/-	0	+	0/+	1	0	0	+	0	0	0	+	+/0	It is important that existing and new waste management sites are managed properly so that it should not detract the surroundings. Where waste management facilities will be placed, physical surroundings could be unpleasant. This option will have positive impact on natural resources and climate change by implementing the waste hierarchy and minimising landfilling.	
Cumulative effects	+/-	-/0	++	+	+/-	+/-	0	+	0/+	1	0	0	+	0	0	0	+	+/0		

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Sustainable movement</b>																				
<b>Policy Options</b>																				
Accessibility	+	+	0	+	+	+	++	++	+	0	0/+	0	+	0	0	0	+	+/0	Accessibility improvements will help in contributing to the economic growth of the borough. Provision of walking and cycling routes would encourage people to use sustainable modes of transport and thus helping in mitigating climate change and promoting health and wellbeing.	
Parking requirements	+	+	0	1	+	?	?	?	?	0	0	0	+/0	0	0	0	+	+	Meeting London Plan targets and also provides disabled parking. It also allows car free development.	
Transport infrastructure improvements	+	+	0	0/+	1	+	++	++	+	0/1	0	0	+	0	0	0/-	+	+	Transport improvements will help in contribute to economic growth, mitigating climate change, improving accessibility and PTALs of the borough.	

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Sustainable movement</b>																				
Freight	+	+	0	0/+	0/-	-/0	+/0	?	?	0	0	0	0/+	0	0	0/-	+/0	+/0		Will provide economic benefits by introducing an additional mode of transportation for business activities. However it could have some negative impact on the river quality and aquatic life of the same. Could also have some negative impacts on local air quality.
<b>Cumulative effects</b>	+	+	0	0/+	?	+	+	?/+	?/+	0	0	0	+/0	0	0	0/-	+	+		

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Promoting good design</b>																				
Policy Options																				
Improving design for Lewisham	+	0	0	0	0	0	0	0	0	0	0	0	0/+	0	0	0	+/0	0		Likely to enhance the townscape and other design aspects of the borough. Likely to contribute to community wellbeing. Objectives such as open spaces, biodiversity, climate change, flooding and transport are very much dependent on design and implementation.
Preserving Lewisham's historic environment	+	0	0	0	0	0	0	0	0	0	0	0	0/+	0	0	0	+/0	0		Will contribute to enhancing the historic environment and other archaeological aspects of the borough.
The location for tall buildings	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	It helps in utilising the land resource efficiently. It should be located in one part rather than across the whole borough. Rooftops should be utilised to promote green roofs. Wind effect and issues of overshadowing must be taken into account in the design of such buildings.

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Promoting good design</b>																				
Strategic and local views, landmarks and panoramas	+	0/-	0	I/-	+/0	0	0	0	0	++	+/0	0/-	+	0/+	0	0	+	0/+	0/+	Contributes to local and regional identity.
Lewisham's river and waterways network	+/0	0	0	0	+/0	0	0	0	0	+	0	0	+	0/+	0	0	+/0	+/0		Reduces and mitigates flooding risk. Improving river frontages likely to have a positive impact on the quality of life and natural and physical environment. It will provide leisure facilities and promotes social inclusion. More activity and accessibility in and around likely to reduce fear of crime.
Cumulative effects	+	+/0	0	I	I	I	+/I	I	I	+	+	0/I	0/+	0/+	0	0	+/0	0/+	0/+	

SUSTAINABILITY OBJECTIVES																				
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes	
<b>Community services</b>																				
Community and recreational facilities	+	0/-	-	I	+	+/-	+	I	I	I/0	0	0/-	++	0/+	++	+	++	++		There could be some negative implications on waste and natural resources due to construction activity. Flood risk and climate change are based upon how and where the option would be implemented.
Delivering educational achievements	+	+	0/-	-/I	I	0/-	0	0	0	0	0	0	+	+	++	+	+	+		Option will contribute to economic objectives and community wellbeing. Inclusion of any open spaces within schools are encouraged. Improved facilities such as auditoriums, libraries, swimming pools will be open to public. There could be some temporary implications on air quality, waste and noise due to construction.

SUSTAINABILITY OBJECTIVES																			
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes
<b>Community services</b>																			
Healthy lifestyles and healthcare provision	+	+	-	-/I	I	0/-	I/+	I	I	0	0	0	++	+	0	0	+	+	Overall it will have a positive impact on the health and wellbeing of residents and will help in addressing future needs. Providing such facilities closer to people will help in reducing the need to travel. Could lead to the production of more waste in particular medical waste. There could be some temporary implications on air quality, and noise due to construction activity in the borough.
Cumulative effects	+	+	-	-/I	I	+/-	+/I	I	I	0	0	0	+	+	+	+	+	+	

SUSTAINABILITY OBJECTIVES																			
Core Strategy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	Comments/Any recommended changes
<b>Planning obligations and CIL</b>																			
Policy Options																			
Planning Obligations	0	0	+	+	+	+	+	+	+	+/0	0	0	0	+	+	0	+/0	+	It is identified as a mechanism to secure improvements to compensate for the impacts caused by the development and can be used for the provision of affordable housing, environmental or transport improvements, or any other community facility. It will have a positive impact on most of the SA objectives provided it is implemented effectively. Trade-off is possible.
Community Infrastructure Levy	0	0	+	+	+	+	+	+	+	+/0	0	0	0	+	+	0	+/0	+	Same as above
Cumulative effect	0	0	+	+	+	+	+	+	+	+/0	0	0	0	+	+	0	+/0	+	



## Appendix 7 - Cumulative effects of the policy options

### Key to Symbols

++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
I	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

SA Objectives Policy Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Housing	+/-	-/0	I/0	I/0	-/0	0/I	I/0	I	I	I	I/0	+	+	+	0	+/0	+/0	0/I
Employment land	+	+	-	?	-/I	-/I	+/-	I	I	I	I	I	+	+	I	+	+	+/0
Retail and town centres	+	++	-	-	I	-/I	I	I	I	I	I	0	+	+	0	+	+	+
Climate change	+	I	+	+	+	+	++	++	++	0	0	I	+	0	0	0	0	0
Waterways and flooding	+	I	0	+	+	0/+	0	+	+	+/0	+	I	+	0	0	0/+	+	0
Open spaces and biodiversity	0	I	0	0	++	+/0	0	+	0/+	+	0	I	+	0/+	0	0	+	+
Waste	+/-	-/0	++	+	+/-	+/-	0	+	0/+	I	0	0	+	0	0	0	+	+/0
Sustainable movement	+	+	0	0/+	?	+	+	?/+	?/+	0	0	0	+/0	0	0	0/-	+	+
Promoting good design	+	+/0	0	I	I	I	+/I	I	I	+	+	0/I	0/+	0/+	0	0	+/0	0/+
Community services	+	+	-	-/I	I	+/-	+/I	I	I	0	0	0	+	+	+	+	+	+
Planning obligations and CIL	0	0	+	+	+	+	+	+	+	+/0	0/+	0	0	+	+	0	+/0	+
<b>Results</b>	<b>+</b>	<b>+/I</b>	<b>-/0</b>	<b>I</b>	<b>I</b>	<b>I</b>	<b>+/I</b>	<b>I/+</b>	<b>I</b>	<b>I/+</b>	<b>0/I</b>	<b>I</b>	<b>+</b>	<b>+/0</b>	<b>0</b>	<b>0/+</b>	<b>+</b>	<b>0/+</b>

## Appendix 8 - Monitoring framework

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
1	To encourage sustained economic growth	<ul style="list-style-type: none"> <li>Improve business development and enhance competitiveness?</li> <li>Improve the resilience of business and the economy?</li> <li>Promote growth in key sectors?</li> <li>Promote growth in key clusters?</li> </ul>	<p>Annual GDP of Lewisham</p> <p>The net growth in VAT registered businesses</p> <p>Amount of floor space developed for B1, B2 &amp; B8 uses</p> <p>Amount of completed retail, office and leisure development</p>	<p>n/a</p> <p>2007: 5,335</p> <p>2007/08 Gross B1: 1,209 m<sup>2</sup> B2: 1,399 m<sup>2</sup> B8: 2,631 m<sup>2</sup> Total: 5,239 m<sup>2</sup></p> <p>Net B1: -5,127 m<sup>2</sup> B2: 1,129 m<sup>2</sup> B8: -3,616 m<sup>2</sup></p> <p>2007/08 Gross B1(a): 665 m<sup>2</sup> A1: 2,163 m<sup>2</sup> A2: 500 m<sup>2</sup> A3: 633 m<sup>2</sup> A4: 340 m<sup>2</sup> A5: 381 m<sup>2</sup> D2: 7,103 m<sup>2</sup></p> <p>Net B1(a): 459 m<sup>2</sup> A1: 265 m<sup>2</sup> A2: -165 m<sup>2</sup> A3: -623 m<sup>2</sup> A4: -70 m<sup>2</sup> A5: 381 m<sup>2</sup> D2: 5,218 m<sup>2</sup></p>	<p>2004: 4,595 2006: 5,065</p> <p>2005/06: Gross: B1: 1,223m<sup>2</sup> B2: 0m<sup>2</sup> B8: 1,717m<sup>2</sup></p> <p>2006/07: Gross: B1: 3,892 m<sup>2</sup> B2: 0 m<sup>2</sup> B8: 0 m<sup>2</sup></p> <p>2005/06: Gross: B1(a): 1,223 m<sup>2</sup> A1: 1,189 m<sup>2</sup> A2: 967 m<sup>2</sup> A3: 539 m<sup>2</sup> A4: 0 m<sup>2</sup> A5: 224 m<sup>2</sup> D2: 77 m<sup>2</sup></p> <p>Net B1(a): no data A1: -65 m<sup>2</sup> A2: 810 m<sup>2</sup> A3: -171 m<sup>2</sup> A4: -870 m<sup>2</sup> A5: 224 m<sup>2</sup> D2: 77 m<sup>2</sup></p> <p>2006/07: Gross B1(a): 3,892 m<sup>2</sup></p>	<p>n/a</p> <p>Annually</p> <p>Annually</p> <p>Annually</p>	<p>n/a</p> <p>By 2009: 4,749</p> <p>No target</p> <p>No target</p>	<p>Business rates</p> <p>NOMIS Official Labour Market Statistics</p> <p>Annual Monitoring Report - Core Indicator 1a &amp; BD1</p> <p>Annual Monitoring Report - Core Indicator 4a</p>

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
					A1: 635 m <sup>2</sup> A2: 169 m <sup>2</sup> A3: no data A4: no data A5: no data D2: 1,000 m <sup>2</sup>  Net B1(a): 3,102 m <sup>2</sup> A1: 236 m <sup>2</sup> A2: -390 m <sup>2</sup> A3: -171 m <sup>2</sup> A4: no data A5: 381 m <sup>2</sup> D2: 885 m <sup>2</sup>  2004: 0.75%	Annually	0.85	Annual Business Inquiry
2	To encourage and promote employment and new enterprises in Lewisham	<ul style="list-style-type: none"> <li>Reduce unemployment overall?</li> <li>Reduce long-term unemployment?</li> <li>Provide job opportunities for those in need of employment?</li> </ul>	<p>Proportion of employment in creative industries (LQ)</p> <p>Employment rate of disadvantaged groups (working age employment)</p> <p>Employment rate of disadvantaged groups (over 50s employment)</p> <p>Employment rate of disadvantaged groups (BME employment)</p> <p>Employment rate of disadvantaged groups (lowest qualification employment)</p> <p>Number of new businesses created as a result</p>	<p>2006: 0.75%</p> <p>2007/08:</p> <p>2007/08:</p> <p>2007/08:</p> <p>2007/08:</p>	<p>2004/05: 71.4%</p> <p>2004/05: 54.4%</p> <p>2004/05: 61.4%</p> <p>2004/05: 33.5%</p> <p>2005/06: 72</p>	Annually	<p>74.8 by 2009</p> <p>59.5 by 2009</p> <p>64.5 by 2009</p> <p>45.5 by 2009</p> <p>88 by 2009</p>	<p>LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2</p> <p>LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2</p> <p>LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2</p> <p>LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2</p> <p>LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2</p>

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
			of support from business support agencies					monthly report, Nov 2006, appendix 2
			Percentage of economically active people in Lewisham	2007: 75.7% (136,900 people)	2005: 76.4% (132,700 people) London average: 74.5%	Annually	No target	NOMIS Official Labour Market Statistics
			Number of people working within Lewisham	2006: 59,700	2007: London average: 75.0% GB: 78.6%	Annually	No target	NOMIS Official Labour Market Statistics
3	To minimise the production of waste and increase waste recovery and recycling	<ul style="list-style-type: none"> <li>Lead to reduced consumption of materials and resources?</li> <li>Reduce household waste?</li> <li>Increase waste recovery and recycling?</li> <li>Reduce hazardous waste?</li> <li>Reduce waste in the construction industry?</li> </ul>	Percentage of municipal waste recycled	2007/08: 21.41%	2006/07: 14.01% 2005/06: 11.96% Best Quartile 2006/07 England: 22.88% London: 21.77%	Annually	2005/06: 14% 2006/07: 17% 2007/08: 18%	Best Value 082a
			Percentage of municipal waste composted	2007/08 0.58 %	2005/06: 0.24% 2006/07: 0.30% Best Quartile 2006/07 England: 15.53% London: 9.19%	Annually	2006/07: 1% 2007/08: 2%	Best Value 082b
			Percentage of municipal waste incinerated	2007/08 73.16%	2005/06: 77.75% 2006/07: 76.26% Best Quartile 2006/07 England: 11.66% London: 53.09%	Annually	2006/07: 75% 2007/08: 73%	Best Value 082c
			Percentage of municipal waste landfilled	2007/08: 4.84%	2005/06: 10.04% 2006/07: 9.47% Best Quartile 2006/07 England: 55.63%	Annually	2006/07: 7% 2007/08: 7%	Best Value 082d

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
					London: 28% 2005/06: 470kg 2006/07: 469.9kg Best Quartile 2006/07 England: 394.98kg London: 390.60kg 2005/06: 100% 2006/07: 100%	Annually	2006/07: 455 kg 2007/08: 460 kg	Best Value 084a
				2007/08: 451.40 kg				
			Percentage of household waste served by recyclables kerbside collection	2007/08: 100%		Annually	2006/07: 100% 2007/08: 100%	Best Value 091
4	To ensure the efficient use of natural resources	<ul style="list-style-type: none"> <li>Improve the quality of river water or ground water?</li> <li>Conserve water?</li> <li>SUDS?</li> </ul>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</p> <p>Change in biological river quality (Good)</p> <p>Provides an indication of the level of river health. The higher the figure indicates the more healthy the rivers are over time</p> <p>Change in chemical river quality (Good)</p> <p>Provides an indication of the level of river</p>	2007/08: 0	2005/06: 0 2006/07: 0	Annually	2006/07: 0 2007/08: 0	Annual Monitoring Report – Core Indicator 7 & E1C
				A and B (Good or better) Thames Region: 2007: 1.3% decrease	A and B (Good or better) Thames Region 2001: 73.8% 2002: 75.7% 2003: 72.4% 2004: 67.5% 2005: 66.2% 2006: 65.8% 2007: 64.5%		No target	Environment Agency
				A and B (Good or better) Thames Region: 2007: 4.7% increase			No target	Environment Agency

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
			health. The higher the figure indicates the more healthy the rivers are over time Chemical river water quality (Good) as a percentage of total river length	A and B (Good or better) Thames Region: 2001: 76.6% 2002: 80.5% 2003: 72.9% 2004: 77.8% 2005: 75.0% 2006: 71.5%	A and B (Good or better) Thames Region 2001: 76.6% 2002: 80.5% 2003: 72.9% 2004: 77.8% 2005: 75.0% 2006: 71.5%	Annually	No target	Environment Agency
5	To maintain and enhance biodiversity, flora and fauna.	<ul style="list-style-type: none"> <li>Conserve and enhance natural/semi-natural habitats?</li> <li>Provision and quality of open space</li> <li>Conserve and enhance species diversity, and in particular avoid harm to protected species?</li> <li>Maintain and enhance sites designated for their nature conservation interest?</li> <li>Maintain and enhance woodland cover and management?</li> <li>Improve air quality?</li> <li>Reduce car use?</li> <li>Reduce vehicle movement?</li> </ul>	Changes in areas and populations of biodiversity importance, including: (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, or sub-regional significance	2007/08: (i) no data (ii) Site of Metropolitan importance: 0% Borough importance (Grade 1): 0% (Grade 2): 0.38% Local Importance: - 0.38%		2005/06: (i) not currently monitored (ii) 0% change 2006/07 No data	Maintain and enhance the current population of biodiversity importance	Annual Monitoring Report - Core Indicator 8
6	To improve air quality and reduce noise and vibration.		Levels Exceeding Main Air Pollutant Quality Standards.				As per AQMA standards	To be completed

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
7	To reduce car travel and improve accessibility by sustainable modes of transport	<ul style="list-style-type: none"> <li>Reduce car use?</li> <li>Increase/enhance bicycle/walking routes?</li> <li>Proximity to public modes of transport?</li> </ul>	<p>Traffic volume (million vehicle km)</p> <p>Modal share (%)</p>	<p>910</p> <p>Walk 27.8 Cycle 1.2 Car 39.9 Motorcycle 0.5 Bus 15.4 Underground/D LR 10.0 Rail 4.4 Taxi 1.4 Other 0.1</p>	<p>1.1% increase since 2001. Growth of 5.5% by 2011 if trend continues</p>	<p>2003 Annually</p> <p>2001 Annually</p>	<p>Zero growth between 2001 and 2011</p> <p>Maintain or increase the proportion of personal travel made by means other than the car</p>	<p>LIP Target 5</p> <p>LIP Target 7</p>
8	To mitigate, and adapt to, the impact of climate change	<ul style="list-style-type: none"> <li>Reduce greenhouse gas emissions?</li> <li>Reduce energy consumption?</li> <li>Lead to an increased proportion of energy needs being met from renewable sources?</li> <li>Flood protection?</li> <li>Sustainable design and construction?</li> </ul>	<p>Volume and rate of walking trips</p> <p>Volume and rate of cycling trips</p> <p>Renewable energy capacity installed by type</p>	<p>163,617 per average day</p> <p>4,481</p> <p>2007/08: No. of permission: 19 Types: Photovoltaic Panel: 3 Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13 Other renewable energy measures: 9</p>	<p>1991: 52,577</p>	<p>2001</p> <p>2001</p> <p>Annually</p>	<p>Increase</p> <p>Increase</p> <p>Target to be set in the Spatial (Core) Strategy</p>	<p>LIP Target 12</p> <p>LIP Target 13</p> <p>Annual Monitoring Report - Core Indicator 9/ E3</p>
9	To minimise and mitigate flood risk	<ul style="list-style-type: none"> <li>Is there flood protection?</li> <li>SUDS?</li> <li>Decreasing runoff?</li> <li>Construction</li> </ul>	<p>Number of planning permissions granted contrary to the advice of the Environment</p>	<p>2007/08: 0</p>	<p>2005/06: 0 2006/07: 0</p>	<p>Annually</p>	<p>0</p>	<p>Annual Monitoring Report - Core Indicator 7</p>

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
10	To maintain and enhance landscapes and townscapes	<p>practices that adapt to flooding?</p> <ul style="list-style-type: none"> <li>Reduce the amount of derelict, degraded and underused land?</li> <li>Improve the landscape and ecological quality and character?</li> <li>Decrease litter?</li> <li>Design?</li> </ul>	<p>Agency on either flood defence grounds or water quality</p> <p>The proportion of relevant land and highways that is assessed as having combined deposits of litter and detritus across four categories of cleanliness (Clean, Light, Significant, Heavy)</p>	<p>2007/08: 14.67%</p>	<p>2005/06: 28.5%</p> <p>2006/07: 24%</p> <p>Best Quartile 2006/07 England: 7% London: 14.6%</p>	Annually	<p>2006/07: 22%</p> <p>2007/08: 21%</p>	Best Value 199a
11	To conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough	<ul style="list-style-type: none"> <li>Conserve and enhance the historic built character of the borough, especially within designated conservation areas?</li> <li>Protect sites of archaeological and historic importance?</li> </ul>	<p>Open Space availability per 1,000 population</p> <p>Percentage of conservation areas in the Borough with an up-to-date character appraisal</p>	<p>2007/08: 42.31%</p>	<p>2005/06: 28%</p> <p>2006/07: 36%</p> <p>Best Quartile 2006/07 England: 43.63% London: 65%</p>	Annually	<p>1.7ha by 2006</p> <p>1.75ha by 2010</p> <p>28%</p>	<p>Open Space Strategy</p> <p>Best Value 219b Annual Monitoring Report Local Indicator</p>
12	To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home	<ul style="list-style-type: none"> <li>Reduce homelessness?</li> <li>Increase the range and affordability of housing for all social groups?</li> <li>Reduce the number on unfit homes?</li> <li>Reduce death rates?</li> </ul>	<p>Percentage of conservation areas in the Borough with management proposals</p> <p>Number of Housing Completions</p> <p>Number of Affordable Housing Completions</p>	<p>Target met</p> <p>2007/08: 978</p> <p>2007/08: 273 dwellings, 91 habitable rooms (off site)</p>	<p>2001/02: 470</p> <p>2002/03: 722</p> <p>2003/04: 778</p> <p>2004/05: 503</p> <p>2005/06: 967</p> <p>2006/07: 628</p> <p>2005/06: 246</p> <p>2006/07: 269</p>	Annually	<p>2004/05: 36%</p> <p>2005/06: 44%</p> <p>2006/07: 52%</p> <p>975 dwellings annually</p> <p>140</p>	<p>Best Value 219c Annual Monitoring Report Local Indicator</p> <p>Annual Monitoring Report</p> <p>Annual Monitoring Report</p>



OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
		<ul style="list-style-type: none"> <li>Improve access to high quality, health facilities?</li> <li>Encourage healthy lifestyles?</li> <li>Reduce poverty and social exclusion and health inequalities in those areas most affected?</li> <li>Improve affordability to essential services to the home?</li> </ul>						
13	To improve the health and wellbeing of the population	<ul style="list-style-type: none"> <li>Improve qualifications and skills of younger people?</li> <li>Improve qualifications and skills of adults?</li> </ul>	Households with a Limiting Long-Term Illness	2001: 31,577 (29.4%)	2001: London: 29.65% England: 33.55%		No target Aim to reduce this number.	ONS Census 2001 Census KSO8
14	To reduce poverty and promote social inclusion	<ul style="list-style-type: none"> <li>Reduce actual levels of crime?</li> <li>Reduce the fear of crime?</li> <li>Reduce the actual noise levels?</li> <li>Reduce noise concerns?</li> </ul>	Index of local deprivation	2007: rank 39 out of 354 local authorities in England	2004: 38	Every 3 year	No target. Improve rank	DCLG
15	To provide for the improvement of education and skill levels	<ul style="list-style-type: none"> <li>Encourage engagement in community activities?</li> <li>Increase the ability of people to influence decisions?</li> <li>Improve ethnic relations?</li> <li>Conserve and enhance the historic</li> </ul>	People Aged 16-74 with no qualifications  Percentage of pupils achieving 5 or more GCSE's at grades A*-C or equivalent	2007: 17,000  2007/08: 54.8%	2007 Lewisham: 9.7% London: 12.8% GB: 13.1%  2005/06: 49% 2006/07: 54.8% Best Quartile 2006/07 England: 61.8% London: 63.23%	Annually  Annually	Aim to reduce this number  2006/07: 51% 2007/08: 52.8%	NOMIS Official Labour Market Statistics Census KS13 Best Value 038

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
		<p>built character of the borough, especially within designated conservation areas?</p> <p>Protect sites of archaeological and historic importance?</p> <ul style="list-style-type: none"> <li>• Reduce homelessness?</li> <li>• Increase the range and affordability of housing for all social groups?</li> <li>• Reduce the number on unfit homes?</li> <li>• Reduce death rates?</li> <li>• Improve access to high quality, health facilities?</li> <li>• Encourage healthy lifestyles?</li> <li>• Reduce poverty and social exclusion and health inequalities in those areas most affected?</li> <li>• Improve affordability to essential services to the home?</li> <li>• Improve qualifications and skills of younger people?</li> <li>• Improve qualifications and skills of adults?</li> <li>•</li> </ul>	<p>Number of learners completing adult education basic skills programme</p> <p>Domestic burglaries per 1,000 households</p> <p>Vehicle crimes per 1,000 population</p> <p>Violent crimes per 1,000 population</p>	<p>2007/08:</p> <p>2007/08: 20.7</p> <p>2007/08: 15.2</p> <p>2007/08: 41.1</p>	<p>2003/04: 1,480 2004/05: 1,550 2005/06: 1,600</p> <p>2005/06: 21.1 2006/07: 23.3</p> <p>Best Quartile 2006/07 England: 5.80 London: 14.05</p> <p>2005/06: 17 2006/07: 16</p> <p>Best Quartile 2006/07 England: 7.00 London: 13.95</p> <p>2005/06: 34.3 2006/07: 44.9</p> <p>Best Quartile 2006/07 England: 13.1 London: 21.95</p>	<p>Annually</p> <p>Annually</p> <p>Annually</p>	<p>2005/06: 1,600 2006/07: 1,700 2007/08: 1,700 2009/09: 1,700</p> <p>2006/07: 21 2007/08: 22</p> <p>2006/07: 14 2007/08: 14</p> <p>2006/07: 41.8 2007/08: 22.9</p>	<p>Best Value - Local</p> <p>Best Value 126a</p> <p>Best Value 128a</p> <p>Best Value 127</p>
16	To reduce crime, anti-social behaviour and the fear of crime							

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
17	To encourage a sense of community identity and welfare	<ul style="list-style-type: none"> <li>• Reduce actual levels of crime?</li> <li>• Reduce the fear of crime?</li> <li>• Reduce the actual noise levels?</li> <li>• Reduce noise concerns?</li> </ul>	No of recorded racial incidents per 100,000 population	2007/08: 54.9	2005/06: 40.89 2006/07: 41.20	Annually	No target	Best Value 174
18	To improve accessibility to leisure facilities, community infrastructure and key local services	<ul style="list-style-type: none"> <li>• Encourage engagement in community activities?</li> <li>• Increase the ability of people to influence decisions?</li> <li>• Improve ethnic relations?</li> </ul>	Number of physical visits to public libraries (per capita)	2007/08:	2004/05: 6,018.95 2005/06: 6,222	Annually	2005/06: 7,000 2006/07: 7,000 2007/08: 7,200 2008/09: 7,500	Best Value 117

**For translation contact:**

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LIÊN LẠC KHI CÓ NHU CẦU THÔNG DỊCH:

Controkha troogmada:

翻譯請聯絡：

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