

Core Strategy options report

February 2009

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1.1 Lewisham Core Strategy

- 1.1** The Lewisham Core Strategy sets out the vision, objectives, strategy and policies that will guide development and regeneration in the London Borough of Lewisham (the borough) over the next 15 years. Major change is anticipated, with a focus on Lewisham, Catford, Deptford and New Cross, and we need to plan for this.
- 1.2** 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.

Statement 1

Nature of core strategies

The Government requires every local planning authority to produce a core strategy. This must include ⁽¹⁾:

1. an overall vision which sets out how the London Borough of Lewisham should be developed
2. strategic objectives for the area focusing on key issues to be addressed
3. a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and
4. clear arrangements for managing and monitoring the strategy.

- 1.3** The Core Strategy will provide detailed guidance on where and how development should take place in the borough including specific policies and proposals for different areas and strategic sites. It will set out the location, amount and types of new housing, jobs and shopping facilities that need to be provided and will clearly set out the responsibilities of private and public groups (developers, the Primary Care Trust, Transport for London etc) to ensure schools, public transport, community facilities, parks and recreation areas (and all those things which make a community sustainable) can be provided for both new and existing residents. Dealing with these things together is known as spatial planning.
- 1.4** The Core Strategy will cover a period of 15 years from 2010 (the expected date of adoption) to 2025. Extensive monitoring, through the Annual Monitoring Report ⁽²⁾, will assess the implementation of the strategy and the need for its review (or partial review) before 2025.
- 1.5** The Lewisham Core Strategy ⁽³⁾ forms part of the Council's Local Development Framework or LDF. This is the term for the collection of new planning documents that provide the planning strategies, policies and proposals for the borough.

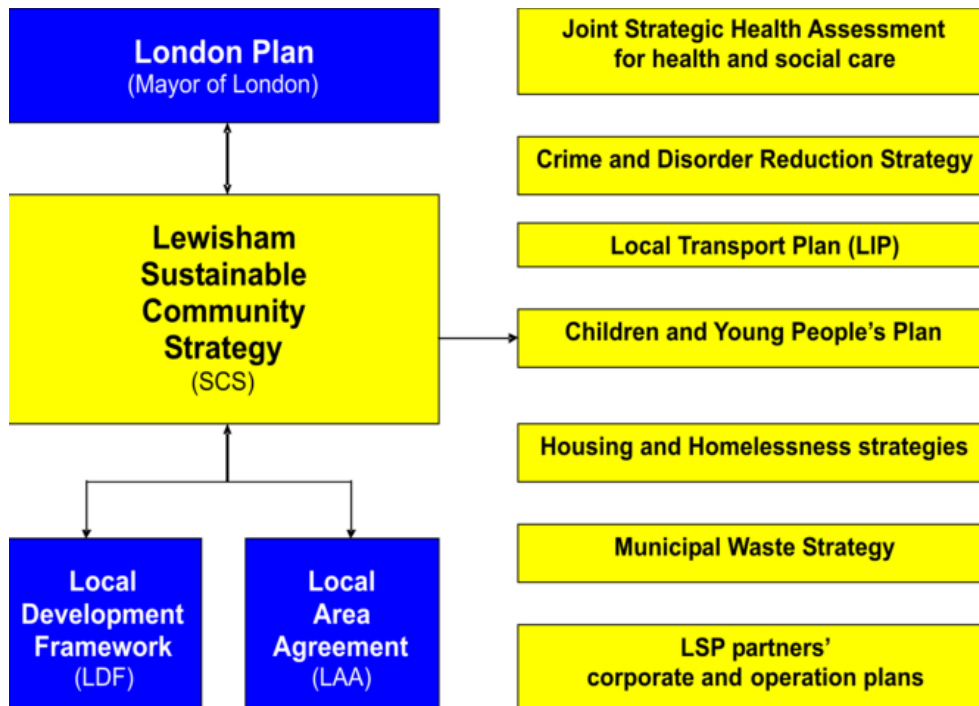
1 Planning Policy Statement 12, paragraph 4.1

2 The Annual Monitoring Report is published in December each year by the Council as required by the Planning and Compulsory Purchase Act 2004. It reports on the assessment of planning policies and their implementation, and the results of progress against a series of national and local indicators and targets.

3 The Lewisham Core Strategy is a Development Plan Document in accordance with the Planning and Compulsory Purchase Act 2004. The effect of this is that during its preparation it is subject to independent examination and, once adopted, it forms part of the statutory development plan.

- 1.6** The Core Strategy will be at the heart of the LDF and will build on the vision outlined in the Sustainable Community Strategy to make Lewisham the best place to live, work and learn over the next 15 years. Figure 1.1 shows the relationship of the LDF to the Sustainable Community Strategy and other council documents

Figure 1.1 The relationship of the LDF to other documents



1.2 Process so far

- 1.7** Lewisham has made good progress in preparing its Core Strategy. The Council initiated a wide ranging debate at the Issues and Options stage (July – November 2005) about the borough's future and what local changes, if any, needed to be made.
- 1.8** These ideas were developed at the Preferred Options stage (June 2007) as to how to turn Lewisham into 'the best place in London to live, work and learn'⁽⁴⁾.
- 1.9** During the Preferred Options stage over 1,400 individuals, groups, associations and government agencies and specific consultation bodies were consulted. Key messages received from the consultation were:
- support for improving Lewisham and Catford town centres
 - the need to provide for affordable housing
 - general support for the mixed use employment sites in Deptford and New Cross
 - ensuring development is located close to train stations and bus routes to reduce the use of car travel
 - the need to protect conservation areas and historic buildings from development
 - the need to ensure parks and other areas of open space are not built on
 - ensuring individual developments are as energy efficient as possible and

⁴ The vision from the Lewisham Sustainable Community Strategy which needs to be spatially reflected in the Lewisham Core Strategy

- concern that an increase in population places pressure on existing services and facilities such as schools, GP surgeries, leisure facilities, trains, buses, parks, etc.

Since this time, a number of matters have arisen most notably further guidance from Government on the appropriate content and level of detail expected within the Lewisham Core Strategy.

This has meant a change in emphasis for the Core Strategy and the need for the Council to commission further evidence or background reports to inform and justify any position (or options) being put forward and considered.

- 1.10** These government changes have meant we have had to review the content of the Core Strategy and the way we present our Core Strategy. This document, the Core Strategy Options Report, has been prepared to meet regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, in order to bring together the work done to date and provide new information needing further consideration and consultation, prior to the preparation of a draft core strategy.

Statement 2

Core Strategy Options Report

The Core Strategy Options Report is not a draft Core Strategy document but clearly shows the possible options and content the Council could include as part of the draft version. It does not include draft policies but shows options the Council could develop into policies when it prepares the draft Core Strategy.

The purpose of the Core Strategy Options is to ensure that all stakeholders and members of the public have the opportunity to not only comment in detail on what options should or could be taken forward but also on those alternative options which are not being taken forward (those options which are not seen as being suitable) and the various evidence reports used to justify the Council's position.

Each option presented is open to comment and all representations received will be considered and reviewed before a draft Core Strategy is prepared.

1.3 Factors influencing the preparation of the Core Strategy Options

- 1.11** Extensive public and stakeholder input has taken place and continues to take place as the core strategy develops. Further details on what you have previously told us are contained throughout this document as well as in separate consultation reports available from the Council and on our website.

- 1.12** A wide range of other plans and programmes of the Council and key stakeholders have been considered when preparing this report. This includes the Lewisham Sustainable Community Strategy ⁽⁵⁾ and other plans relating to housing, transport, infrastructure, the environment, education, economic development and community services. Where relevant, key linkages to these other plans and programmes are highlighted throughout this document.
- 1.13** In previous rounds of consultation for both the Issues and Options (2005) and the Preferred Options (2007) the information and options presented were grouped into traditional planning themes such as housing, transport, employment, open space and the like ⁽⁶⁾. This often made it hard to understand the cumulative impact of what was being proposed and what it meant for different localities of the borough and the borough as a whole.
- 1.14** This Core Strategy Options Report presents the options spatially. Two strategic spatial growth options are presented which form the key part of this document. This shows the implications for the borough of implementing alternative regeneration and growth options and what this would mean for different localities – Catford and Lewisham as opposed to Forest Hill and Deptford.

The Core Strategy Options Report shows:

- the areas where major regeneration will and is proposed to occur
- 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.

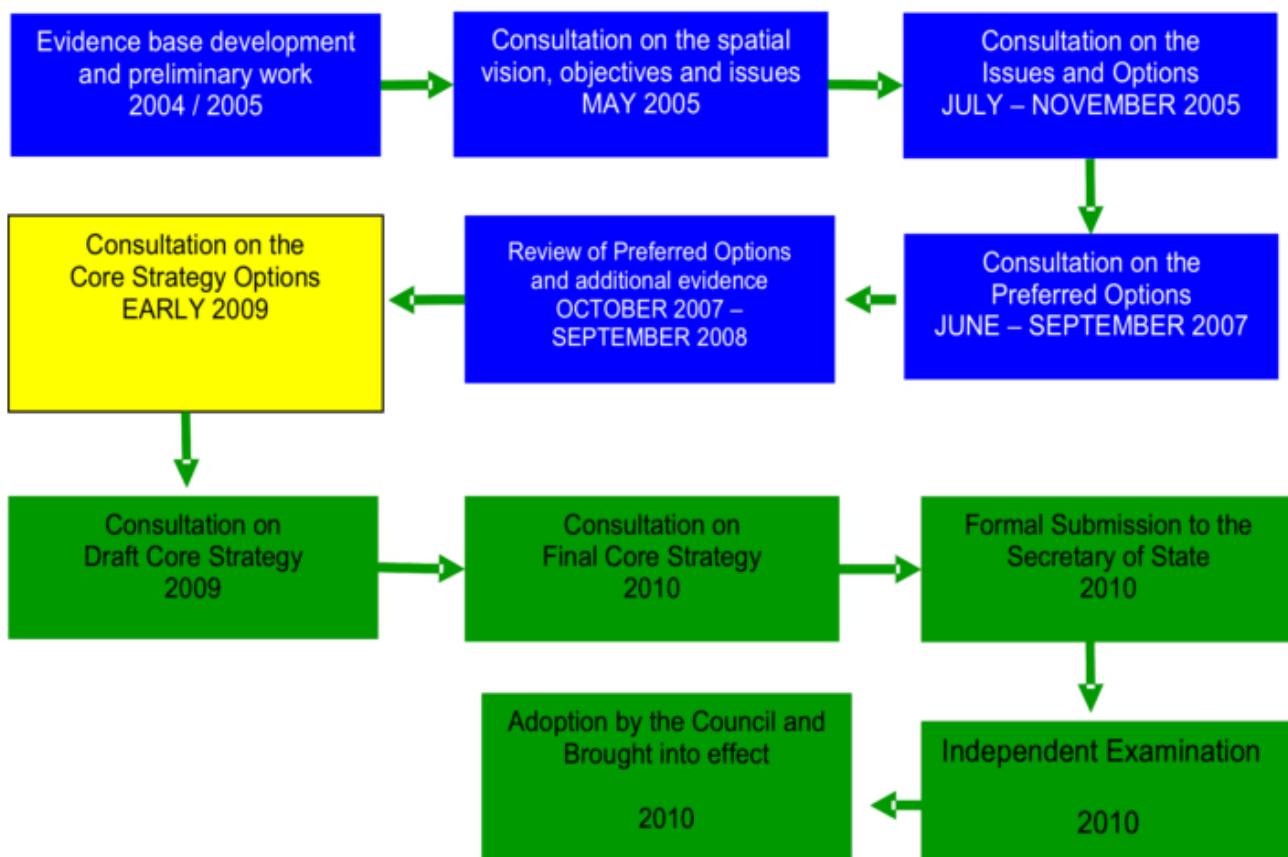
- 1.15** There is also a greater emphasis on implementation - who we will be working with to achieve certain aims, the timescales involved and how we will go about this.
- 1.16** The Core Strategy Options Report is therefore more spatial and locally distinctive and does not merely repeat national and regional policy. In ensuring locally distinctive options, the Council has prepared, and will continue to maintain, a strong evidence base. Relevant linkages to the evidence base are highlighted throughout this document. Following the Preferred Options consultation in 2007 we have prepared the following:
- Strategic Flood Risk Assessment
 - Strategic Housing Market Assessment
 - Strategic Housing Land Availability Assessment
 - Employment Land Study
 - Waste Technical Paper
 - a preliminary assessment of anticipated social infrastructure
 - an assessment of the cumulative traffic impacts arising from forecast development and
 - updated the Retail Capacity Assessment.

5 All local authorities have a statutory duty to work with partner organisations to produce a Sustainable Community Strategy (SCS) – a document which demonstrates how local organisations and agencies will work together to improve the economic, social and environmental well-being of their area. The Lewisham SCS was adopted in May 2008.

6 Refer to Appendix 3 for a list of the Issues and Options Papers and respective options put forward

- 1.17** Many of these reports are required by national planning policy and contribute to ensuring that the options we are putting forward or not carrying forward are based on a sound and robust evidence base.
- 1.18** Information from the Issues and Options (2005) and the Preferred Options (2007) consultations has been integrated to further show how options have been selected. The options and alternatives have also been assessed through a Sustainability Appraisal (SA).
- 1.19** As part of the process for preparing the Core Strategy, the Council is statutorily obliged to undertake a Sustainability Appraisal and a Strategic Environmental Assessment (SEA). 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. The SA has highlighted the key social, economic and environmental impacts and identified mitigation and avoidance measures to ensure effective implementation. Relevant sections from the SA have been included throughout this document to justify any suggested approach.
- 1.20** Following this consultation and analysis of the feedback received, the Council will prepare a draft Lewisham Core Strategy. This will contain the strategy and policies for the borough and will be released for consultation in 2009. The overall process of preparing the Lewisham Core Strategy is illustrated in Figure 1.2.

Figure 1.2 Process in preparing the Lewisham Core Strategy



1.4 National planning policies and the London Plan

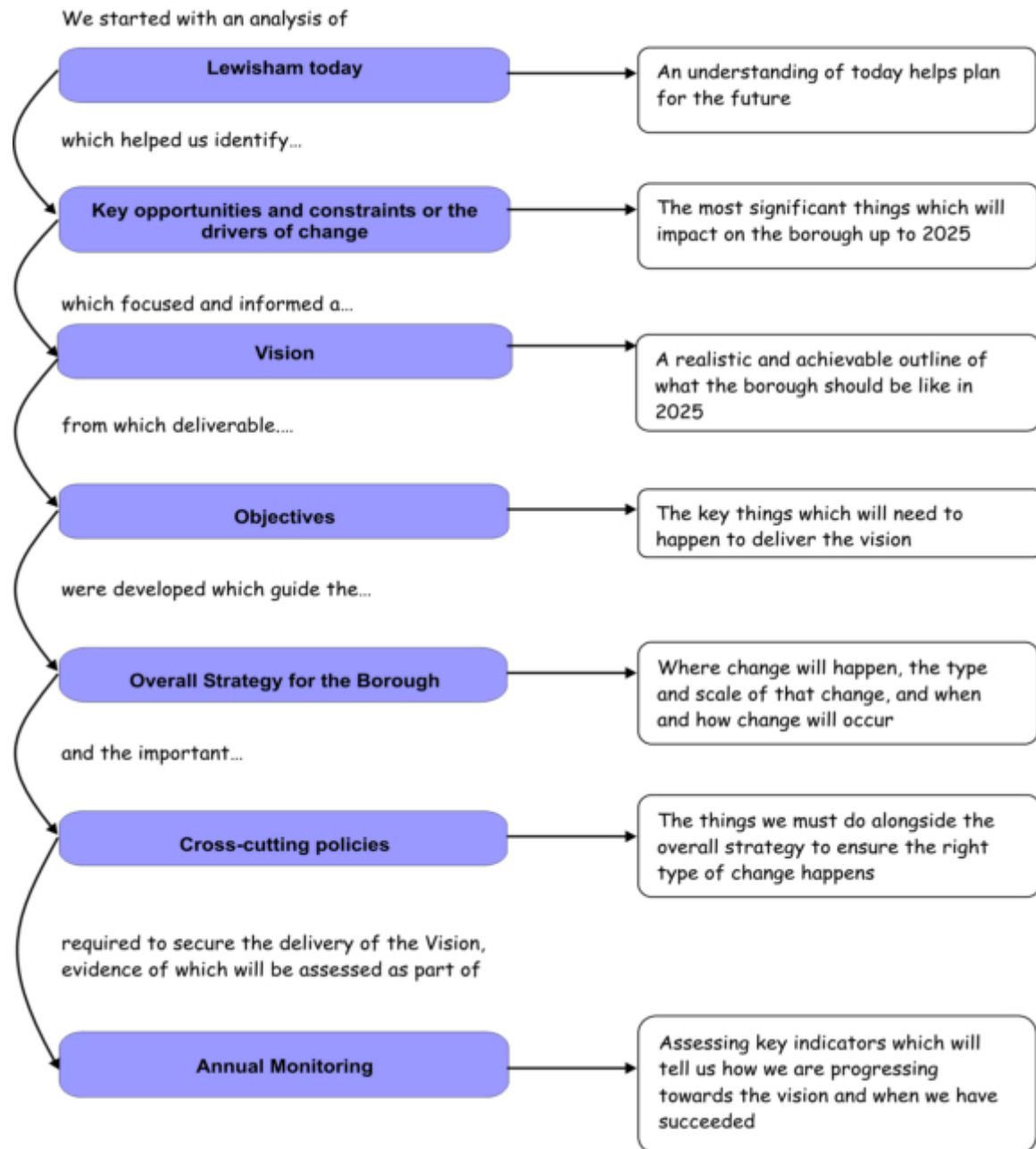
- 1.21** National planning policy is contained in a series of Planning Policy Statements and other documents which set out the Government's planning policies. Most notably PPS12 shows the process for preparing LDF documents. Additionally, the London Plan ⁽⁷⁾ sets out regional planning policies for Greater London.
- 1.22** The Core Strategy Options Report has been prepared so as to be consistent with national planning policies and in general conformity with the London Plan. Throughout the report the impacts of national and regional planning policies are highlighted, particularly where they limit the options available at the local level. It needs to be recognised that there are certain things that we cannot change or influence and must implement. However, in some instances, evidence has been used to justify a locally distinctive approach for Lewisham.

1.5 Structure of this document

- 1.23** The Core Strategy Options is structured as follows:
- Section 2 sets out the place Lewisham is today.
 - Section 3 builds on Lewisham today and sets out the most significant characteristics expected to impact the borough over the next 10 to 15 years and the key issues the Core Strategy needs to cover.
 - Section 4 proposes a vision for the borough in 2025 based on previous rounds of consultation and the continuing issues we need to address.
 - Section 5 contains key objectives for the Core Strategy, which set out more specifically what needs to happen to deliver the vision.
 - Section 6 details two options for the borough showing where and how development, regeneration and change could take place.
 - Section 7 sets out the options for the cross-cutting and delivery/implementation policies. Alternative options and options proposed not to be carried forward are also identified.
 - Section 8 outlines the next steps in preparing the draft and final versions of the Core Strategy and how you can continue to be involved.
 - Appendices provide background and additional information.
- 1.24** The structure of the Lewisham Core Strategy Options Report seeks to present the systematic way in which, the Council has prepared the document to date. The approach is outlined in Figure 1.3.

⁷ The London Plan is the name given to the London Spatial Development Strategy, prepared by the Mayor of London, and forms part of the statutory development plan for the borough (along with local development plan documents such as the Lewisham Core Strategy)

Figure 1.3 The approach to preparing the Lewisham Core Strategy



2.1 Introduction

- 2.1** Knowing the character of Lewisham today and being aware of the things that will impact on the borough in the future are the first steps in preparing the Core Strategy. It is the factual base provided in this section that defines the drivers of change, from which the objectives can be created. The objectives will go on to form the central themes of the Core Strategy, which in turn establishes policy for Lewisham.

2.2 An outline of the borough

- 2.2** 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⁽⁸⁾, 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.
- 2.3** Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area⁽⁹⁾ 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⁽¹⁰⁾ 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⁽¹¹⁾ and is expected to provide 975 new homes per year up to 2016⁽¹²⁾.
- 2.4** Home to approximately 258,000⁽¹³⁾ people and 113,000⁽¹⁴⁾ 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. 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.

8 The London boroughs of Greenwich, Southwark, Bromley and Tower Hamlets (across the River Thames)

9 As designated in the Sustainable Communities Plan (Sustainable Communities: Building for the future 2003)

10 Policy 2A.5

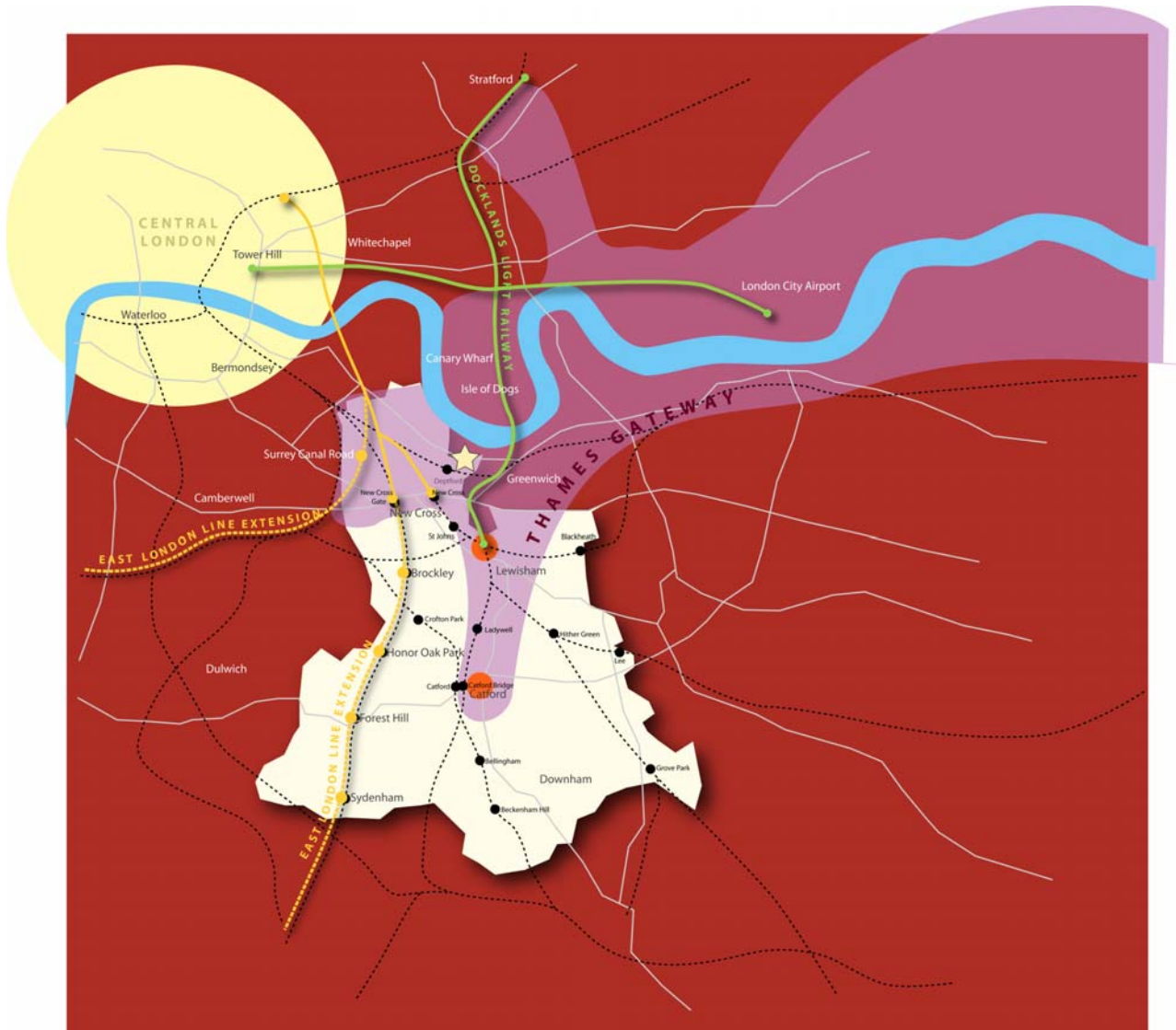
11 London Plan Policy 3B.4 and Annex 2

12 London Plan Policy 3A.2

13 As estimated by ONS 2007, mid year population estimate published 21 August 2008

14 113,041 dwelling stock by tenure condition, period: April 2006, Neighbourhood Statistics, ONS updated on 26 March 2008

Figure 2.1 London Borough of Lewisham within its wider strategic context



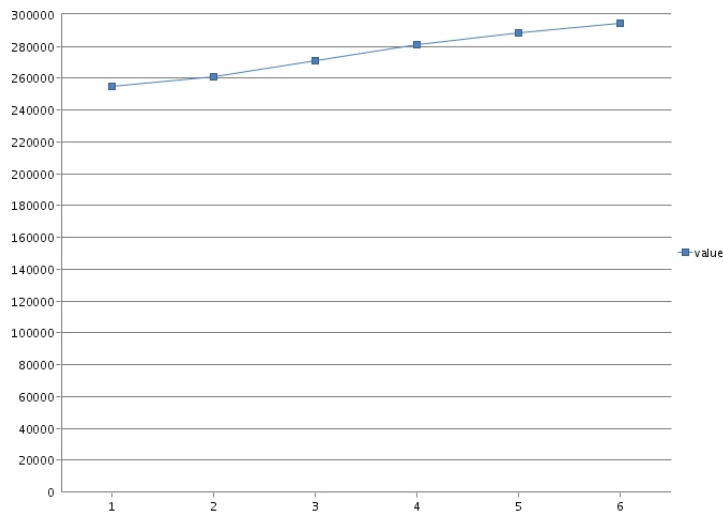
2.3 People

- 2.5 The population is expected to increase by approximately 25,000 people up to 2016 ⁽¹⁵⁾. This would represent a 10% rise in 10 years.
- 2.6 Children and young people (0-19 years) make up 25% of the population ⁽¹⁶⁾, one of the highest proportions in London. Elderly residents (over 75 years) make up just 5%. The average age of our population is 34.7 years and is young when compared to other London boroughs.

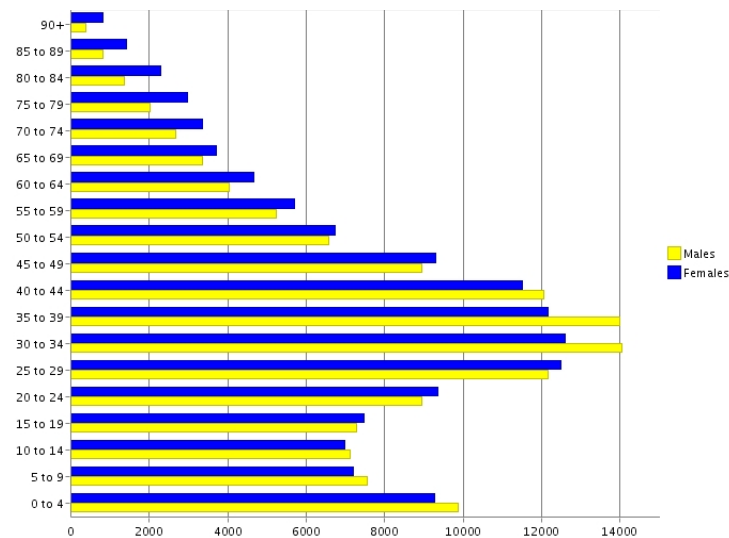
15 According to the 2007 Mid Year Estimates prepared by the Greater London Authority, Lewisham's population could be 279,600 compared to 257,000 estimated in 2005

16 Census 2001

Lewisham's projected population growth 2006-2026



Age and sex of Lewisham's population 2007



2.7 Between 2001 and 2005 Lewisham had a net loss of over 8,000 young people under 16 due to migration to the rest of England and Wales. This is the equivalent of over 3% of the borough's population ⁽¹⁷⁾.

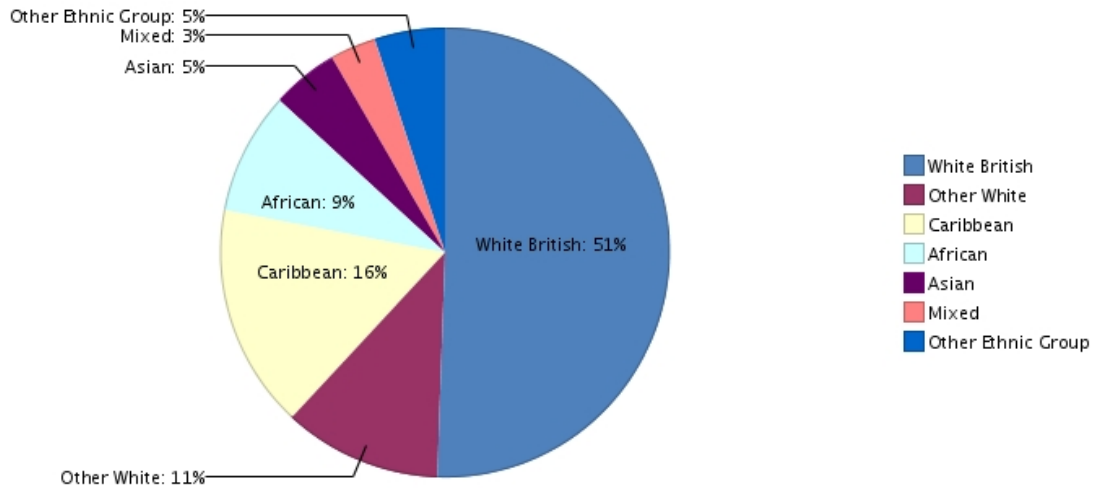
2.8 There has been a growth in all groups of the the black and minority ethnic (BME) population from 39% of households ⁽¹⁸⁾ to nearly half of all households (49.4%) in 2007 ⁽¹⁹⁾, who largely live in the northern and central parts of the borough.

17 ONS Migration Statistics

18 Census 2001

19 Lewisham Household Survey 2007, Strategic Housing Market Assessment 2008

Ethnicity in Lewisham: 2007 (%)



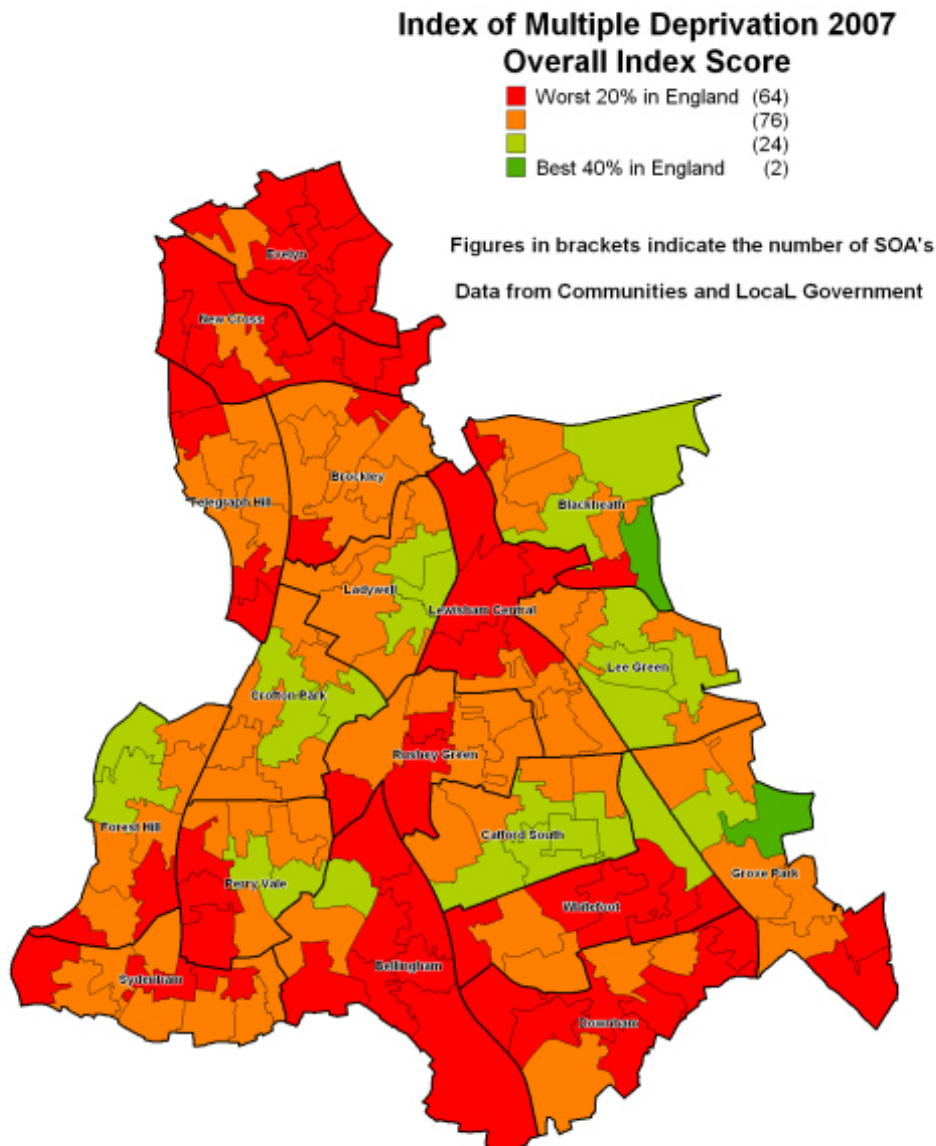
2.9 The average life expectancy of Lewisham residents is 76 years. This compares to 78.3 years for London and 78.1 years for Great Britain ⁽²⁰⁾.

2.10 Lewisham is considered to be the 39th most deprived local authority area in England ⁽²¹⁾ 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 and Telegraph Hill; and parts of Brockley and Lewisham Central.

20 Census 2001

21 Indices of Multiple Deprivation (IMD) 2007

Figure 2.2 Indices of Multiple Deprivation 2007 for LB Lewisham



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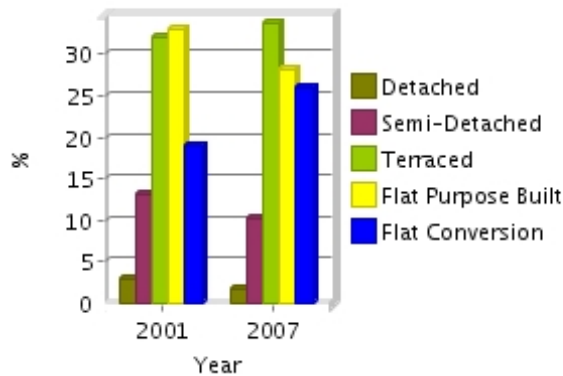
2.4 Homes

- 2.11** Of the total dwelling stock, over half of properties in Lewisham are flats, of which nearly half are converted dwellings rather than purpose built⁽²²⁾. Of the remainder, over a third are terraced houses and more than a tenth are detached or semi-detached⁽²³⁾.

22 54%, Lewisham Household Survey 2007, Strategic Housing Market Assessment (SHMA) 2008

23 34% and 12% respectively Lewisham Household Survey 2007, SHMA 2008

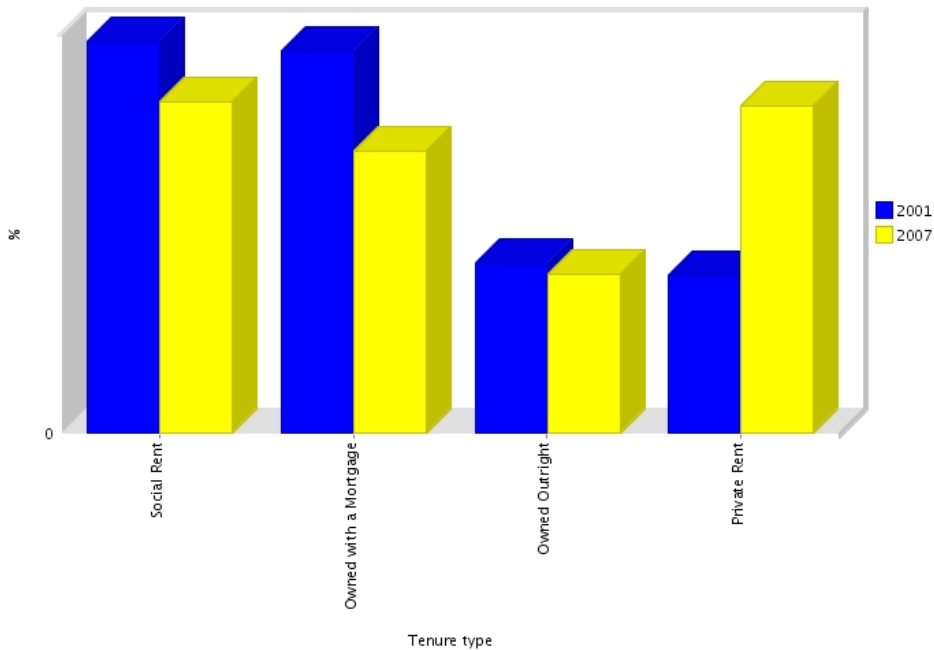
Accommodation types in Lewisham



2.12 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 ⁽²⁴⁾.

2.13 A dramatic change has taken place in the tenure of property in the borough in the past few years. The amount of private rented properties has 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 ⁽²⁵⁾. This provides a roughly equal tenure split between private rent, social rent and private ownership. It is considered that the increase in the private rented sector is a result of the buy-to-let market in recent years.

Housing tenure in Lewisham 2001 and 2007



24 Lewisham Household Survey 2007, SHMA 2008

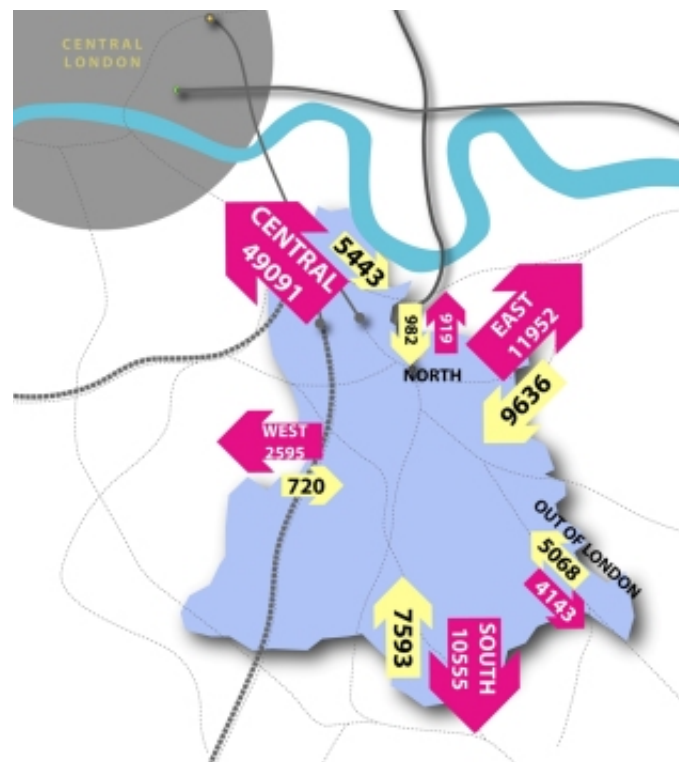
25 Census 2001 and Lewisham Household Survey 2007, SHMA 2008

- 2.14** A total of 33,922 households ⁽²⁶⁾ 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).
- 2.15** Deptford, Lewisham Town Centre and Bellingham are the areas in the borough most likely to contain unsuitably housed households ⁽²⁷⁾ which corresponds to areas identified with higher levels of deprivation ⁽²⁸⁾.

2.5 Jobs

- 2.16** 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 ⁽²⁹⁾. The borough workforce numbered around 66,000 in 2006, a rise of 8% since 1998 ⁽³⁰⁾. 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 and is shown on Figure 2.3 ⁽³¹⁾.

Figure 2.3 Where Lewisham's population travels to work



- 2.17** Town centres are key locations of economic activity and employment in the borough. The largest employment category is the Public Administration, Education and Health Services sector with 38% (22,807 employees) of jobs in 2006 ⁽³²⁾. The Distribution, Hotels and

26 Lewisham Household Survey 2007, SHMA 2008
 27 Lewisham Household Survey 2007, SHMA 2008
 28 IMD 2007
 29 Lewisham Economic Development Business Plan 2004
 30 Lewisham Employment Land Study (ELS) 2008
 31 2001 Census
 32 Chapter 3 ELS

Restaurants (mostly retail) and the Banking and Finance sectors are the next largest employment categories with 22% each (12,800 employees). The broad employment categories are as expected given Lewisham's place in recent times as a London residential borough.

- 2.18** The borough lost nearly a third of its already fragile industrial base between 2000 and 2004, and the stock of commercial property has decreased in recent times. Commercial and industrial stock shrunk by 8.7% between 1985 and 2003 ⁽³³⁾.
- 2.19** 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 ⁽³⁴⁾. The overall unemployment level was at 3.7% in July 2008 ⁽³⁵⁾.
- 2.20** 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. 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 degree level or beyond ⁽³⁶⁾.
- 2.21** However, Lewisham has a number of disadvantages. There are limited local employment opportunities, which therefore limits local training 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 ⁽³⁷⁾.

2.6 Town centres

- 2.22** 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 is a network of seven district town centres ⁽³⁸⁾, two out-of-centre retail parks ⁽³⁹⁾ and five neighbourhood centres ⁽⁴⁰⁾.
- 2.23** 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 ⁽⁴¹⁾. Convenience and comparison retailers are closely aligned to the national average, while the service sector is slightly higher ⁽⁴²⁾.

33 Lewisham Economic Development Business Plan 2004

34 ELS

35 LB Lewisham Economic Development

36 Chapter 3, ELS

37 Chapter 3, ELS

38 Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross, Sydenham

39 Bell Green and Bromley Road/Ravensbourne Retail Park

40 Brockley Cross, Crofton Park, Downham Way, Grove Park, Lewisham Way

41 LB Lewisham Health Checks 2008

42 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%, Experian Goad 2003, updated by Nathaniel Litchfield and Partners 2004

- 2.24** 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 ⁽⁴³⁾.
- 2.25** Major centres located just beyond the borough boundaries 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.
- 2.26** The Council's Retail Capacity Assessment ⁽⁴⁴⁾ 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.

2.7 Environment

- 2.27** 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

- 2.28** The northern part of the borough is situated immediately adjacent to the River Thames for approximately one kilometre. Deptford Creek, the River Ravensbourne and the 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 ⁽⁴⁵⁾ 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 1000 year event.
- 2.29** 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 made into flood defence to reduce the risk of flooding, particularly within Lewisham Town Centre. However, fluvial flooding still remains a threat to property within the borough ⁽⁴⁶⁾.
- 2.30** 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 ⁽⁴⁷⁾.

Waste

- 2.31** Every London 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 ⁽⁴⁸⁾. Provision in the borough exceeds this amount with the South East London Combined Heat and Power Station

43 17.6% of convenience units against the national average of 9.3%; comparison units represent 29.1% compared to 48.1% nationally, Experian Goad 2003, Nathaniel Litchfield and Partners 2004

44 Nathaniel Litchfield 2004 and 2006 update

45 Strategic Flood Risk Assessment (SFRA) 2008

46 SFRA 2008

47 SFRA 2008

48 London Plan Policy 4A.25 and Table 4A.6

(SELCHP) in Deptford able to accommodate in excess of 420,000 tonnes. Further facilities in Lewisham are capable of dealing with over 200,000 tonnes and provide support to other boroughs in south-east London ⁽⁴⁹⁾.

- 2.32** 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 a target to recycle, compost or reuse 25% of its household waste by 2010/11. Targets have also been set to reduce the amount of municipal landfill by 8% and household waste per household to 716 kg by 2010/11 ⁽⁵⁰⁾.

Local air quality

- 2.33** There are five air quality management areas (AQMA) in the borough, located where the level of pollutants is higher than the acceptable threshold.
- 2.34** 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.
- 2.35** 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 AQMA, 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 ⁽⁵¹⁾.
- 2.36** The Council adopted an Air Quality Action Plan in 2008. The focus of this 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 AQMA.
- 2.37** 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 is on their doorstep.

2.8 Community

- 2.38** Over 40% ⁽⁵²⁾ 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 ⁽⁵³⁾. Over half of journeys to work are taken by public transport ⁽⁵⁴⁾. However, the demand for on-street parking in residential areas remains high.

49 South-east London Boroughs' Joint Waste Apportionment Technical Paper 2008

50 Lewisham Draft Municipal Waste Strategy 2006

51 Air Quality Action Plan 2008

52 42.8% Census 2001

53 Census 2001

54 51.2% Census 2001

- 2.39** 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 £1,450 per secondary school pupil has also been secured for investment in ICT.
- 2.40** Further education facilities are provided on two campuses by Lewisham College at Brockley and Deptford. Goldsmiths College (University of London) at its New Cross campus provides higher education facilities with a focus on creativity, culture and digital technologies.
- 2.41** The borough has 162 GPs distributed through a network of 42 practices, 6 primary care centres and 1 one-stop primary care centre. In addition the borough benefits from the many facilities available at University Hospital Lewisham.
- 2.42** 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.
- 2.43** 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 ⁽⁵⁵⁾.
- 2.44** Lewisham has generally had lower levels of crime than most of the other inner London boroughs ⁽⁵⁶⁾, although the fear of crime is a key issue ⁽⁵⁷⁾.

2.9 Relationship to the draft Core Strategy

- 2.45** The Council intends to include the above overview of the characteristics of the borough in the draft Core Strategy subject to any updates and improvements or suggestions which may arise as a result of consultation.

Question 1

Key characteristics

Do you support the identified key characteristics that contribute to the character of Lewisham?

Question 2

Other trends

Are there any other key trends you feel impact on Lewisham?

55 Lewisham Preliminary Social Infrastructure Framework 2008

56 Metropolitan Police Service

57 Residents Survey 2007

Question 3**Further comments**

Do you have any further comments relating to Lewisham today?

- 3.1** Derived from the analysis of the existing characteristics of Lewisham today as set out in Section 2, a succinct series of key drivers of change has been developed. These set out the most significant issues expected to impact on the borough up to 2025, and the key consequences the Core Strategy seeks to address.

3.1 Housing provision

- 3.2** The strategic designation of parts of the borough within the Thames Gateway and the London Plan opportunity areas creates a clear strategic requirement that the borough accommodate significant new housing. This is reflected in the borough's housing targets derived from the London Plan. The expected increase in population and the number of households in the borough reinforces this need at a local level, as does the requirement for affordable housing.
- 3.3** The opportunity to provide new housing in a highly developed borough are limited, so reviewing opportunities to better use underused employment areas and town centres as housing locations is necessary. The need to improve the sustainability of new, and existing, housing, is crucial to address climate change and air quality issues and improve living quality conditions.

3.2 Economic development

- 3.4** Growing the relatively small borough economy is a priority of the Council and is essential to the creation of a sustainable community. A key priority is the need to provide local employment opportunities and enhance employment prospects by improving local training opportunities, and accessibility to jobs within and beyond the sub-region, particularly Docklands and the City.
- 3.5** Continuing the strong growth in the number of small businesses, supporting creative industries, focusing on the economic potential of town centres, and better using underused employment areas are key areas to build upon to reduce unemployment, contribute to economic growth and seeks to reduce deprivation in the borough.

3.3 Adapting to climate change and environmental management

- 3.6** Climatic changes and the need to promote sustainable development will be central drivers of the Core Strategy. Action needs to be taken to minimise the borough's contribution to climate change, particularly when the proportion of CO₂ emissions from both the Domestic and Road Transport sectors is higher in Lewisham than the London and UK averages.
- 3.7** This includes not only the need to minimise and manage flood risks but also action to improve local air quality and manage waste. The approach should also aid and encourage access by means other than the private car, applied as part of a comprehensive approach to the management of the supply of parking, to support the climate change objective.

3.4 Building a sustainable community

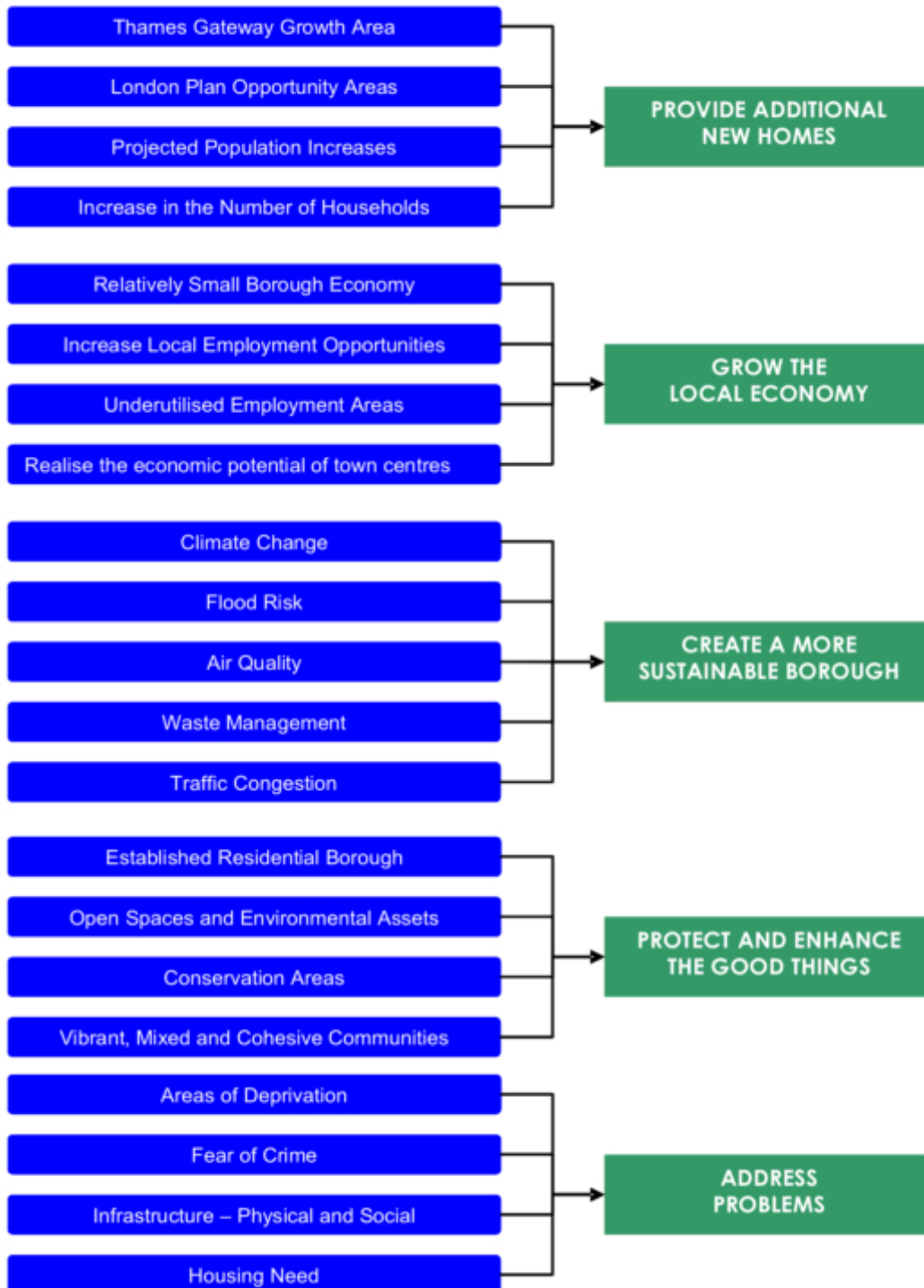
- 3.8** Existing characteristics and development pressures require the provision of effective services and good infrastructure (high quality street environment; walking and cycling networks; public transport; schools; health care; leisure facilities; parks and gardens and the like) which meet expectations. Collectively these aspects will contribute towards ensuring Lewisham builds sustainable communities.

- 3.9** The need to ensure that the benefits of new development are maximised for all in the community will be central to addressing and reducing issues related to deprivation. New development can contribute to both the provision of new and the enhancement of existing services and facilities, where there will be a demand for such arising from the new populations.
- 3.10** There is also a role to play in creating a sense of place by improving the quality of buildings and ensuring places contribute to a 'sense of community'. However, the aspirations of new residents need to be integrated with those of existing communities, while at the same time continuing to address the needs of the borough's diverse communities.

3.5 Summary

- 3.11** Figure 3.1 seeks to summarise the key drivers of change and their key consequences which need to be factored into the Lewisham Core Strategy.

Figure 3.1 Key drivers of change influencing the Lewisham Core Strategy



3.6 Relationship to the draft Core Strategy

- 3.12 The Council intends to include the above key drivers of change in the draft Core Strategy subject to any corrections and improvements which may arise as a result of consultation.

Question 4

Drivers of change

Do you agree with the drivers of change as listed?

Question 5

Drivers of change expression

Do you feel they are expressed clearly?

Question 6

Further comments

Do you feel there are any other drivers of change that could have an impact on the preparation of the Core Strategy?

- 4.1** A vision for the type of place the borough should be in 2025 is essential to lead the implementation of the Core Strategy. This vision is focused and informed by the borough's characteristics and the key opportunities and constraints. It seeks to be realistic and achievable. The vision went through a number of iterations in its development, moving from overarching but generic statements through to the current vision which seeks to be locally specific and spatial ⁽⁵⁸⁾.

Statement 3

Vision requirements

The vision should be informed by an analysis of the characteristics of the area and its constituent parts and the key issues and challenges facing them. The vision should be in general conformity with the RSS (Regional Spatial Strategy - in the case of Lewisham the London Plan) and it should closely relate to any Sustainable Community Strategy for the area ⁽⁵⁹⁾.

- 4.2** Crucially, the vision is a spatial vision. This means delivering the vision is often beyond the influence of the planning system itself. However, the Core Strategy will play a key role in influencing outcomes and coordinating delivery across other areas of interest, particularly health and education services and the provision of public transport.

4.1 Sustainable development

- 4.3** Sustainable development has formed the basis of preparing the Core Strategy and underpins the entire Local Development Framework ⁽⁶⁰⁾. Sustainable development can be defined as:

- *'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'* ⁽⁶¹⁾.

- 4.4** The Government has set out four aims for sustainable development in the UK as follows:

- social progress which recognises the needs of everyone
- effective protection of the environment
- prudent use of natural resources and
- maintenance of high and stable levels of economic growth and employment.

- 4.5** The principles of sustainable development will run throughout the Core Strategy and have been used to inform and guide the development of the strategy, vision and options identified in this document.

58 Issues and Options consultation 2005 and Preferred Options consultation 2007

59 Planning Policy Statement 12, paragraph 4.2

60 The Council must prepare the Local Development Framework with the objective of contributing to the achievement of sustainable development as required by Section 39 of the Planning and Compulsory Purchase Act 2004

61 This definition was drawn up by the World Commission on Environment and Development in 1987

- 4.6 The Council has also undertaken a Sustainability Appraisal ⁽⁶²⁾ of the options and will monitor the significant effects of implementing the final Core Strategy through the Annual Monitoring Report.

4.2 Lewisham Sustainable Community Strategy

- 4.7 The starting point of developing the vision for the Core Strategy is the vision for the borough contained in the Lewisham Sustainable Community Strategy 2008-2020 called Shaping our Future ⁽⁶³⁾.

Sustainable Community Strategy vision

Together we will make Lewisham the best place in London to live, work and learn

- 4.8 The Sustainable Community Strategy (SCS) contains the shared priorities for the borough ⁽⁶⁴⁾. The Lewisham Strategic Partnership agreed a set of six key outcomes which form the basis for public action locally. These are as follows:

Key outcomes of Lewisham's Sustainable Community Strategy

Ambitious and achieving – where people are inspired and supported to fulfil their potential.

Safer – where people feel safe and live free from crime, antisocial behaviour and abuse.

Empowered and responsible – where people are actively involved in their local area and contribute to supportive communities.

Clean, green and liveable – where people live in high quality housing and can care for and enjoy their environment.

Healthy, active and enjoyable – where people can actively participate in maintaining and improving their health and well-being.

Dynamic and prosperous – where people are part of vibrant communities and town centres, well connected to London and beyond.

- 4.9 The SCS will be supported through partnerships that are committed to:
- **Reducing inequality** – narrowing the gap in outcomes that exist in the life chances of the most disadvantaged and

62 A sustainability appraisal is a tool for understanding whether policies, strategies or plans promote sustainable development, and for improving those policies to deliver more sustainable outcomes. A sustainability appraisal is required under the Planning and Compulsory Purchase Act 2004

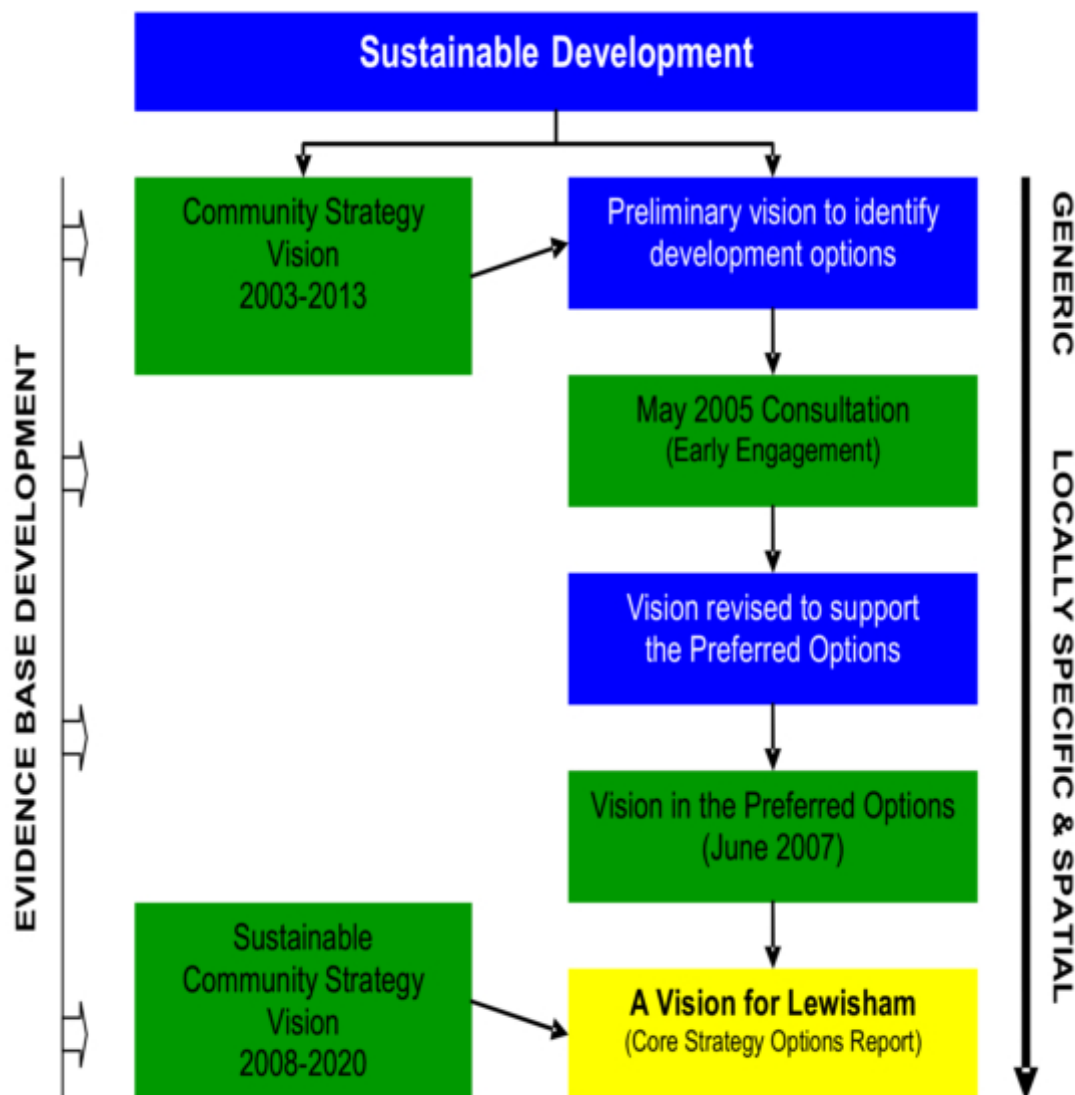
63 The development of the Core Strategy must have regard to the Sustainable Community Strategy (SCS)

64 The SCS was adopted in May 2008 and updated and replaced the Community Strategy first prepared by the Council in 2003

- **Delivering together, efficiently, effectively and equitably** – ensuring that all citizens have appropriate access to high quality local services.

4.10 In taking forward the SCS vision and ensuring the six key outcomes and partnership priorities are reflected through the Core Strategy, it is essential that it is given a spatial and implementation focus so that it drives the development of the Core Strategy. The Council did this by going through a number of iterations of the vision, from the generic through to the spatial, as illustrated in figure 4.1.

Figure 4.1 Core Strategy vision development



4.11 The preliminary vision and the vision to support the Preferred Options (June 2007) are included as Appendix 1 to this document.

4.3 A vision for Lewisham in 2025

4.12 A key consideration when determining future development proposals will be the extent to which individual proposals take the borough forward towards the vision. The vision seeks to maximise the changes occurring in the borough and to improve what's good about Lewisham so that all in the community share in the good quality of life it can offer.

- 4.13** The Council has outlined the following elements to create a vision to be considered for inclusion as part of the draft Core Strategy, subject to any comments that may arise as a result of consultation.

Core Strategy Vision for Lewisham 2025

In 2025, the regeneration and physical transformation of the London Borough of Lewisham will have played a key part of the success in 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 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.
- Catford Town Centre, home of the Council's services and the civic heart of the borough, will be a lively, attractive town centre focused around a high quality network of public spaces. Driven by the redevelopment of key opportunity areas, including the redevelopment of the former Catford Greyhound 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 of 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 have been 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.

Question 7**A vision for Lewisham 2025**

Do you support the elements that are suggested to contribute to the Core Strategy vision?

Question 8**Vision expression**

Do you feel the vision is expressed clearly?

Question 9**Further comments**

Are there other considerations that need to be included in the vision?

Signposts and evidence base**National**

PPS1 Sustainable development

PPS12 Creating strong, safe and prosperous communities through Local Spatial Planning

Regional

London Plan, 2008

Local

Shaping our future: Lewisham's Sustainable Community Strategy 2008-2010

Core Strategy Issues and Options, 2005

Core Strategy Preferred Options, 2007

5.1 The vision for the borough identified in section 4 will need to be strongly related to the strategic objectives for the Core Strategy. The strategic objectives are the things that need to happen, and which the Core Strategy needs to help make happen, in order to deliver the vision.

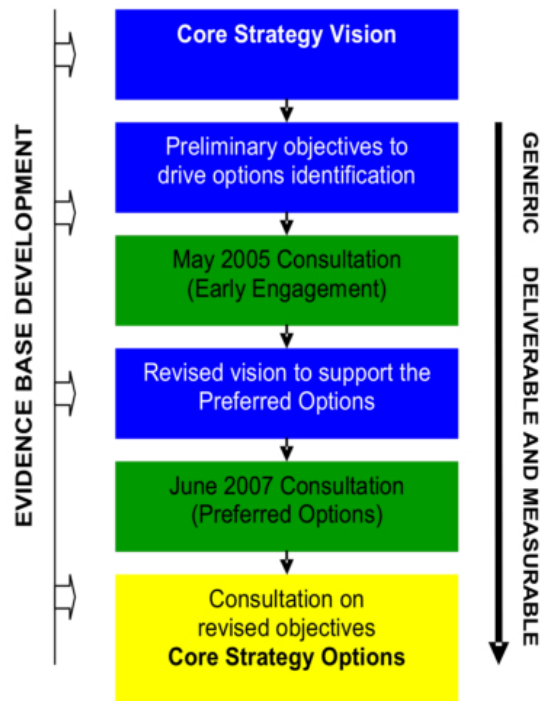
Statement 4

What are strategic objectives?

The strategic objectives form the link between the high level vision and the detailed strategy. They should expand the vision into the key specific issues for the area which need to be addressed, and how that will be achieved within the timescale of the core strategy ⁽⁶⁵⁾.

5.2 Much like the vision, the strategic objectives also went through a number of iterations and have developed from broad sustainability/strategic objectives through to specific and deliverable objectives. The strategic objectives are, as far as possible, measurable so that in future the Council can report back to the community on what progress has been made. Figure 5.1 shows the process of developing the objectives.

Figure 5.1 Core Strategy objective development



65 Planning Policy Statement 12, paragraph 4.3

- 5.3** The strategic objectives have been prepared to reflect the 'drivers of change' and seek to interpret the vision. They have been grouped into five main themes.

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, Downham and Bellingham.

Providing new homes

Core Strategy Objective 2: Meet local housing need

Ensure a sufficient supply of high quality and sustainable housing for all Lewisham's 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.

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.

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 measures necessary to create a low-carbon borough and reduce the adverse effects on climate change.

Core Strategy Objective 5: Flood risk

Take action to protect the borough from the risk of flooding and mitigate the effects 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 Lewisham's waste and meet apportionment targets.

Building a sustainable community

Core Strategy Objective 8: Transport and accessibility

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 in the key localities 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 both phases of the East London Line Extension, the Thameslink programme, and the 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 foster 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 key regeneration areas of Lewisham, Catford, Deptford and New Cross.

- 5.4** The relationship of the above proposed Core Strategy objectives to the objectives contained in the Sustainable Community Strategy is shown in Figure 5.2.

Figure 5.2 Relationship between the Core Strategy and the Sustainable Community Strategy objectives



5.1 Relationship to the draft Core Strategy

5.5 The Council intends to include the above objectives in the draft Core Strategy subject to any corrections and improvements which may arise as a result of consultation.

Question 10**Core Strategy objectives**

Do you feel the strategic objectives proposed for the draft Core Strategy cover all the relevant issues?

Question 11**Strategic objectives expression**

Do you feel the strategic objectives are expressed clearly?

Question 12**Further comments**

Are there other strategic objectives that could be included to deliver the vision?

Signposts and evidence base**Regional**

London Plan, 2008

Local

Shaping our future: Lewisham's Sustainable Community Strategy 2008-2010

Core Strategy Issues and Options, 2005

Core Strategy Preferred Options, 2007

Local Implementation (Transport) Plan, 2007

Strategic Flood Risk Assessment, 2008

Strategic Housing Market Assessment, 2008

Employment Land Study, 2008

Southeast London Boroughs' Joint Waste Apportionment Technical Paper (draft)

Social Infrastructure Framework, 2008 (Working Paper)

- 6.1** As outlined in section 3, we need to address the drivers of change and ensure we can implement the Core Strategy's spatial vision and strategic objectives. The Core Strategy will be built around achieving the vision and strategic objectives outlined in sections 4 and 5. Sustainable development is the key principle underpinning planning⁽⁶⁶⁾ and, together with a greater awareness of the implications of climate change, will underpin the Core Strategy. The planning approach for the borough will be to facilitate sustainable growth in those areas most able to accommodate it.

Statement 5

Core strategy spatial choices

It is essential that the core strategy makes clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPDs (development plan documents) is reduced. It also means that decisions on planning applications can be given a clear steer immediately⁽⁶⁷⁾.

- 6.2** The population of Lewisham is projected to grow by over 33,000 people between 2006 and 2025 representing an 8% increase⁽⁶⁸⁾, and the number of new homes that need to be provided will be close to 10,000 between 2006 and 2016 and at least an additional 5,500 by 2025⁽⁶⁹⁾. On the other hand, Lewisham has 26 conservation areas covering 654 hectares and 560 hectares of open space including 45 public parks.
- 6.3** There are established residential areas where minimum change might be expected, although enhancement of the environment is crucial. The impact of flooding must be considered and minimised especially where proposed development areas are likely to be impacted. The Core Strategy will therefore need to set out to preserve and enhance what is best in Lewisham.
- 6.4** We want people and businesses to make a positive choice to live, work and learn in Lewisham. Our vision for 2025 is of a cohesive, vibrant and dynamic borough. With our communities and partners, particularly the Local Strategic Partnership, we are striving to make Lewisham's neighbourhoods prosperous and creative whilst embracing their diversity. By improving access to jobs, education, health, housing and recreation within Lewisham's neighbourhoods, we can deliver this vision.

66 PPS1 in paragraph 3 says that 'sustainable development is the core principle underpinning planning'

67 Planning Policy Statement 12, paragraph 4.5

68 GLA 2008 Round Population Projections

69 As required by the London Plan

6.1 Things which must be done

- 6.5** There are certain parameters within which we must operate. These parameters are outlined in national and regional planning policy and strategy, which combine to determine the local planning policy context and the options available to manage and direct growth and development in Lewisham. The local planning policy framework must be in line with national policy and in general conformity with the regional strategy, the London Plan. There are certain things which we cannot influence and must implement.

Statement 6

Contextual issues: national and regional

The core strategy should not repeat or formulate national or regional policy⁽⁷⁰⁾.

If it is the intention of the local planning authority simply to apply national and regional policy in its decision making it does not need to reiterate it in DPDs⁽⁷¹⁾ in order to do so; nor reformulate it by devising a similar kind of wording which achieves the same result⁽⁷²⁾.

In devising its strategy however, the local planning authority should be consistent with national policy and in general conformity with the regional spatial strategy. This means that the choices made regarding, for example where growth should take place should follow national and regional policy⁽⁷³⁾.

- 6.6** The requirements for Lewisham arising from national and regional policy are outlined below.

6.2 National requirements

- 6.7** The emphasis of national planning policy is on the regeneration of Britain's towns, cities and regions. Key measures include a strong focus on sustainable development which makes the most efficient use of land, reduces the need to travel, gives priority to the use of previously developed land, and adopts a 'plan, monitor, manage' approach. Reducing the impacts of climate change has become a priority. For Lewisham this means but is not limited to:

- ensuring existing and anticipated housing needs are met
- protecting and enhancing the economic viability of its town centres and employment locations
- protecting and enhancing open space and areas of biodiversity
- promoting good design and renewable energy
- reducing and managing waste and the effects of flood risk.

- 6.8** Details are contained in Planning Policy Guidance (PPG) or Planning Policy Statements (PPS) and need to be implemented at the local level unless local circumstances or evidence suggest a variation in approach.

70 PPS12, paragraph 4.30

71 Development plan documents such as the Core Strategy

72 PPS12, paragraph 4.32

73 PPS12, paragraph 4.33

- 6.9** If you would like to find out more about national planning policies, go to the Communities and Local Government website www.communities.gov.uk/planningandbuilding/planning for a full list.
- 6.10** The borough is also partly located within the Government's London Thames Gateway growth area, a key growth area under the Government's *Sustainable Communities Action Plan*. The Government seeks to accommodate significant housing and economic growth in the Thames Gateway, by developing brownfield land and regenerating existing urban areas, placing strong emphasis on the environmental quality of green space and the public realm. Lewisham will continue to benefit from investment in new homes and jobs arising from this designation.

6.3 Regional requirements

- 6.11** The London Plan ⁽⁷⁴⁾ is the spatial development strategy for London and provides a framework for managing London's growing population. It includes an extensive range of policies on transport, housing, employment and the environment. The London Plan forms part of the borough's development plan, and supports the sustainable growth and improved quality of life in the capital. Lewisham's local planning policies must be in general conformity with the London Plan. Key issues needing consideration and inclusion in Lewisham's Core Strategy include:
- addressing the issues relating to climate change
 - contributing locally to the wider London economy
 - meeting forecast housing need
 - tackling social exclusion
 - providing a range of transport choices to improve accessibility
 - improving liveability (including safety, security and open spaces).
- 6.12** The London Plan also establishes key targets for housing and renewable energy provision.
- 6.13** If you would like further information on the London Plan go to the London Plan website www.london.gov.uk/thelondonplan/
- 6.14** A key aspect of the Core Strategy is related to the legal requirement to be 'in general conformity' with the contents of the London Plan. The London Plan is a lengthy document but contains many policies that specifically apply to Lewisham. The main requirements are set out in the proceeding box.

London Plan requirements for Lewisham

- Opportunity areas for Deptford Creek/Riverside (with LB Greenwich) and Lewisham-Catford-New Cross have been identified as a focus for new housing and jobs. Indicative employment capacity is 4,000 for Deptford Creek/Riverside and 3,500 for Lewisham-Catford-New Cross and 8,000 and 6,000 minimum homes respectively, between 2001 and 2026.
- An annual housing target of 975 dwellings is required ⁽⁷⁵⁾ during the period 2007/08 to 20016/17 and an indicative capacity range of between 310 and 550 dwellings between 2017 and 2026/27 ⁽⁷⁶⁾
- Within the London town centre categorisations, Lewisham and Catford town centres are designated as major centres and Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham as district centres.
- Strategic Industrial Locations (SILs) are established for part of the Surrey Canal area and Bromley Road, which are designated as Preferred Industrial Locations (PILs)
- Significant areas of the borough are identified as Metropolitan Open Land (notably Blackheath and Beckenham Park) and within the Blue Ribbon Network (Ravensbourne River)
- A waste apportionment of 208,000 tonnes is allocated in 2010, rising to 323,000 tonnes in 2020 and
- Greenwich to St Paul's Cathedral and Blackheath Point to St Paul's Cathedral are identified as a protected vista and panorama.

6.15 In determining the spatial options for the borough, it is the intention that the Core Strategy will reflect these London Plan requirements.

6.4 Lewisham Council's response

6.16 The national and regional planning policy parameters dictate and influence the type of strategy, spatial choices and policies Lewisham can include in its Core Strategy and the options for growth and change we can consider.

6.17 Lewisham is already highly built up. We face challenges in how to adapt to our growing population while improving and protecting our environment for existing residents and future generations. We need to get the right developments in the right places and make sure the right services and infrastructure are available to support forecast growth.

6.18 In terms of clearly addressing the drivers of change, ensuring the proposed strategic objectives and vision for the Core Strategy can be implemented, and the requirements of national and regional planning policy are included, we have identified the following opportunities and areas of influence in shaping the options for how the borough can

75 Made up of conventional supply (879), non-self contained (45) and vacant dwellings (73)

76 Annex 4

accommodate growth within an established policy direction towards regeneration and intensification ⁽⁷⁷⁾. Options as to where and how these opportunities can be delivered follow in section 6.5.

Population change

There are opportunities to guide where future development, especially housing, is located and to determine where and how the infrastructure to support population change and growth is provided.

Provide new homes

There are opportunities to ensure housing needs can be met by determining where and how housing growth occurs across the borough, how much can be provided as affordable housing and what the housing mix should be.

Grow the local economy

There are opportunities to ensure a continuous supply of employment land is available for the plan period by reviewing employment land designations through appropriate Strategic Industrial Locations and Local Employment Locations, and ensuring employment growth sectors can be accommodated.

There are opportunities to actively promote growth and manage change in town centres, define a network and hierarchy of centres to focus growth, and determine the amount and type of retail floor space to be allocated to any town centre.

77 As shown through the London Plan's housing targets and opportunity areas for the London Borough of Lewisham

Environmental management

There are opportunities to ensure the borough's growth contributes to reducing the impacts of climate change by ensuring the risk of flooding is managed and mitigated, air quality issues are addressed and buildings are more energy efficient.

There are opportunities to ensure open space deficiency is dealt with, what level of protection is given to the boroughs open space, and the linkages and connections provided within and between the open space networks.

The Council can allocate sites for waste management to show how it meets its waste apportionment. We can also decrease the amount of waste generated by increasing recycling and composting and decreasing the amount of on-site construction and demolition waste.

Building a sustainable community

There are opportunities to ensure we continue to create a sustainable community by ensuring the provision of and access to services and facilities such as schools, health, leisure and recreation.

There are opportunities to ensure that the pattern of development responds to public transport accessibility and capacity, and how this can be improved in areas where there are development opportunities but accessibility is currently low; sustainable modes of transport are promoted and catered for (walking and cycling); car parking provision is managed and is related to public transport accessibility; and severance between the borough's localities is reduced.

There is a need to interpret and implement general design principles as they relate to Lewisham and our context to ensure the highest design quality. The Council can monitor changes in the residential environment, review the character of areas, and obtain designation of new Conservation Areas if it considers that there are valuable characteristics that need to be protected.

6.5 Bringing it together

6.19 The Core Strategy will set Lewisham's overall development and regeneration strategy and will show:

- where it will happen
- how it will be managed and delivered, and
- what services and facilities will, and need, to be provided.

6.20 The Government expects councils to identify enough locations for housing in order to meet targets for the next 15 years, and to identify specific sites sufficient for at least 10 years⁽⁷⁸⁾. To do this, we will need to take a view on the kinds of sites and locations that should be developed for housing⁽⁷⁹⁾.

78 A requirement under PPS3

79 Documented through the SHLAA 2008

- 6.21** A proportion of the borough is susceptible to flooding and situated within a high flood risk area ⁽⁸⁰⁾. Like other inner London boroughs, Lewisham is keen to take advantage of any opportunities for regeneration that arise and will need to show how the risk of flooding will be managed and mitigated. The affected areas correspond with areas where development opportunities exist Lewisham, Catford, New Cross and Deptford. Restricting future residential development in these areas is likely to have a detrimental impact upon the economic and social welfare of the existing community.
- 6.22** Current local planning policy in the Lewisham Unitary Development Plan (UDP) seeks to make sure that developments likely to cause significant demand for travel can be easily reached by public transport, walking and cycling. The UDP also protects a number of uses from redevelopment for alternative use, such as employment or industrial uses. However, the redevelopment of certain industrial sites (particularly in the Evelyn Ward) could provide significant regeneration benefits and improve public transport accessibility in those areas where accessibility is extremely low.
- 6.23** As part of the consultation for the Issues and Options and the Preferred Options ⁽⁸¹⁾ we asked if this approach should be pursued to contribute to Lewisham's regeneration. This approach was generally supported. However, there was concern over the evidence to justify such an approach, and the need to ensure the Council had considered and planned for the supporting infrastructure. Alternative options also needed to be considered.

Statement 7

Core Strategy alternatives

The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate *reasonable* alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the local planning authority (LPA) should evaluate as part of the plan making process. There is no point in inventing alternatives if they are not realistic ⁽⁸²⁾.

- 6.24** Having considered the context within which we must operate, and reviewed the previous rounds of consultation and Government guidance, two reasonable and achievable strategic spatial options for Lewisham's growth and regeneration can now be put forward for consideration.

Core Strategy Strategic Spatial Options and alternatives

Option 1: Seeks to promote and support borough-wide regeneration and growth

Option 2: Applies a more moderate approach to regeneration and growth

80 As identified through the Strategic Flood Risk Assessment and based on PPS25 Flood Risk Zone 3a

81 And subsequently through the SHLAA 2008

82 PPS12, paragraph 4.38

- 6.25** What follows is a discussion of each Strategic Spatial Option and an assessment of the sustainability impacts, with the Sustainability Appraisal used as a means to draw out the differences between the options.

6.6 Strategic Spatial Option 1 - Borough-wide regeneration and growth

6.6.1 What is this option?

Option 1

Strategic Spatial Option 1 seeks to ensure and support borough-wide regeneration and growth

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

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 be used as a catalyst for major regeneration across the borough.

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 social and economic projects.

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 ⁽⁸³⁾.

Option 1 goes beyond the requirements of national and regional policy and implements the London Plan policies where:

- Land to meet strategic housing targets can be identified and exceeded.
- The Opportunity Areas of Creekside (covering parts of Deptford) and Catford-Lewisham-New Cross are a focus for housing and jobs.
- Lewisham and Catford town centres are a focus for larger retail and mixed use development.
- Higher residential densities across the borough are generally correlated to a high public transport accessibility level (PTAL of the site) except where development opportunities can ensure an increase in accessibility and a restrained and managed approach to car parking provision is followed.
- The allocation of land, particularly for housing, follows the sequential approach and exception test for flood risk as set out in PPS25 and the recommendations of the Council's Strategic Flood Risk Assessment (SFRA).
- New development is designed to a high quality and incorporates renewables and sustainable design and construction measures to improve energy efficiency.
- Sites for waste management are identified and safeguarded in the Surrey Canal Strategic Industrial Location (SIL) to meet the borough's total waste apportionment allocation.

83 As outlined in the Employment Land Study 2008

- Development is resisted on open space, particularly Metropolitan Open Land and Sites of Nature Conservation, and a net gain across the borough is sought, particularly through on-site provision.

Spatial Option 1 seeks to improve connections and the quality of places within the borough. Development will be expected to integrate and connect individual sites and contribute to the provision of new links and public spaces. This will enhance the influence of the River Thames, promote north south and east west links, and connect to the proposed Surrey Canal Station (as part of Phase II of the East London Line extension).

6.6.2 Delivery

6.26 Strategic Spatial Option 1 would be achieved through a **spatial hierarchy** as follows.

- A **regeneration and growth corridor** covering Catford - Lewisham - Deptford - New Cross.
- **Activity hubs** covering the town centres of Blackheath, Downham, Forest Hill, Lee Green and Sydenham.
- **Local hubs** covering Brockley Cross, Hither Green and Bell Green.
- **Areas of stability and managed change** for the remaining areas of the borough.

Regeneration and growth corridor

Lewisham and Catford

6.27 Growth is centred and maximised on the **Lewisham** and **Catford** town centres. The Council will prepare an Area Action Plan (AAP) for each of the borough's major town centres to ensure the forecast growth is managed and delivered. There would be significant opportunities to improve the public realm and up grade their overall appearance as places of real urban quality. Mixed use development would be maximised, including tall buildings (where appropriate), and the scale of development would provide opportunities to explore the installation of various types and sizes of renewable technologies.

6.28 Major office-based development would continue to be directed to both the Lewisham and Catford town centres.

Lewisham

6.29 **Lewisham Town Centre** would be designated as a Major Town Centre and the focus will be on elevating Lewisham to metropolitan status within the London retail hierarchy by 2016 by achieving an overall retail floor space of 100,000 square metres. The Council's Retail Capacity Assessment indicates that Lewisham is currently operating with a retail floorspace of just under 80,000 square metres ⁽⁸⁴⁾ (including service uses) in 319 units. The aim is to see a large proportion of the floor space Lewisham needs to achieve metropolitan status as comparison stores to provide a wider range of goods and services. This would see approximately 34,000 square metres of retail floorspace from planned new development.

84 79,246 square metres

- 6.30** The allocation of sites within Lewisham would provide at least 2,550 new homes by 2016 and a further 890 new homes by 2025.
- 6.31** The town centre would contain a strategic development site, the Lewisham Gateway⁽⁸⁵⁾. This will act as a catalyst for regeneration of the town centre providing up to 100,000 square metres of retail, business, residential (approximately 800 new flats), educational, health and leisure uses, with new road layout, parking, servicing, associated infrastructure and improvements to the public transport interchange, as well as open space and improvements to the River Ravensbourne.
- 6.32** Redevelopment at the Loampit Vale sites will see the provision of a new leisure centre including a swimming pool and at least 750 new flats.

Catford

- 6.33** **Catford** would see growth to rejuvenate the existing town centre and address severance issues to strengthen its civic role and Major Town Centre status within the retail hierarchy. Catford is currently operating with a retail floorspace of just under 48,000 square metres⁽⁸⁶⁾ (including service uses) in 148 units. An additional 18,000 square metres (including existing vacant retail units) of retail floor space from new development focused on the redevelopment of the existing Catford Shopping Centre is expected to facilitate this growth scenario. This would primarily be provided as comparison floor space to provide a wider range of goods and entertainment services.
- 6.34** The allocation of sites within Catford would provide at least 1,350 new homes by 2016 and a further 600 new homes by 2025. Major redevelopment opportunities include the former Catford Greyhound Stadium site⁽⁸⁷⁾ and the Catford Shopping Centre.
- 6.35** Proposals to realign the South Circular (A205) would dramatically improve the public realm and reduce traffic through the centre.

Deptford and New Cross

- 6.36** The **Deptford** and **New Cross** area would be a focus for growth and regeneration to address deprivation issues.

Deptford

- 6.37** The **Creekside** (Deptford/Greenwich) London Plan Opportunity Area would be realised and provision made for additional housing and a mix of jobs. Development opportunities would contribute at least 4,100 homes⁽⁸⁸⁾ by 2025 and the Kent and Sun Wharf site would be allocated for high density mixed use development generating at least 350 jobs, new training opportunities, and 300 new homes.
- 6.38** The borough's largest redevelopment site of **Convoys Wharf** (approximately 17 ha) is located within this area and would further contribute to regenerating the Deptford New Cross area through a mixed use development. Uses on this site ceased in September 1999 and the site

85 The LB Lewisham Strategic Planning Committee resolved to approve the planning application on 4 October 2007

86 47,473 square metres

87 The Council's Strategic Planning Committee resolved to approve the Greyhound Stadium scheme on 16 October 2008

88 Achieved at the following sites: Seager, Octavious, Giffin Street, Comet Street, Convoys Wharf

takes up approximately half of Lewisham's River Thames frontage⁽⁸⁹⁾. Part of the site is a protected wharf (protected by two Directions made by the Secretary of State) which means that new development within that area must use the site as a wharf.

- 6.39** The Council has indicated its support for a submitted planning application⁽⁹⁰⁾ based around a high density residential component of 3,500 dwellings with associated office and B Use Class⁽⁹¹⁾, commercial, cultural and leisure development contributing up to 1,825 jobs on site over the range of proposed uses. Redevelopment could also be a focus for green industries, wharf uses, vessel moorings and recycling. The Council is awaiting advice and a decision by the Mayor of London through the Greater London Authority before it can act on the implementation of this application.
- 6.40** The **Deptford Town Centre** would be designated as a District Town Centre and be a location for major new retail and leisure development. The Giffin Street site adjoining the town centre would see a major public square at the heart of Deptford, strengthening the attraction of the High Street, and provision made for a new Tidemill School, library and community space, and additional employment space and housing. The new Deptford Station would provide a new square connecting to Deptford High Street and improve station accessibility.

Deptford New Cross Mixed Use Employment Locations

- 6.41** The Deptford New Cross area would include the release of six Strategic Industrial Locations (SILs)⁽⁹²⁾ as **Mixed Use Employment Locations** (MELs). This would provide at least 5,000 new homes by 2025 and new and reconfigured employment floorspace ranging between 54,000 square metres to 106,800 square metres over 20 years, projected to meet the Greater London Authority (GLA) employment growth forecasts and floorspace projections⁽⁹³⁾.
- 6.42** The redevelopment of the MELs at the lower end of the projected floor space range will involve the loss of some 134,000 square metres of industrial floorspace between 2006 and 2026 and at the higher end of the range a loss of 94,900 square metres of industrial floor space⁽⁹⁴⁾.
- 6.43** However, the area would continue to contain a core supply of employment land, designated as a **Strategic Industrial Location** (SIL) amounting to 27.61 hectares to enable the continuing industrial functioning of London. This would be focused on the Surrey Canal Road area.
- 6.44** The waste management needs of the borough would continue to be supported through the protection of key waste sites in the Surrey Canal SIL to meet the London Plan apportionment. This is further discussed in section 7.3.4.
- 6.45** Redevelopment for 'mixed use employment' would need to contribute to the borough's regeneration objectives through physical and social improvement by providing quality housing, job creation, and new training opportunities leading to improvements in deprivation. The mixed use sites would include:

89 500 metres

90 Lewisham Strategic Planning Committee 26 May 2005

91 72,709 m²

92 Previously known as Strategic Employment Locations or SELs

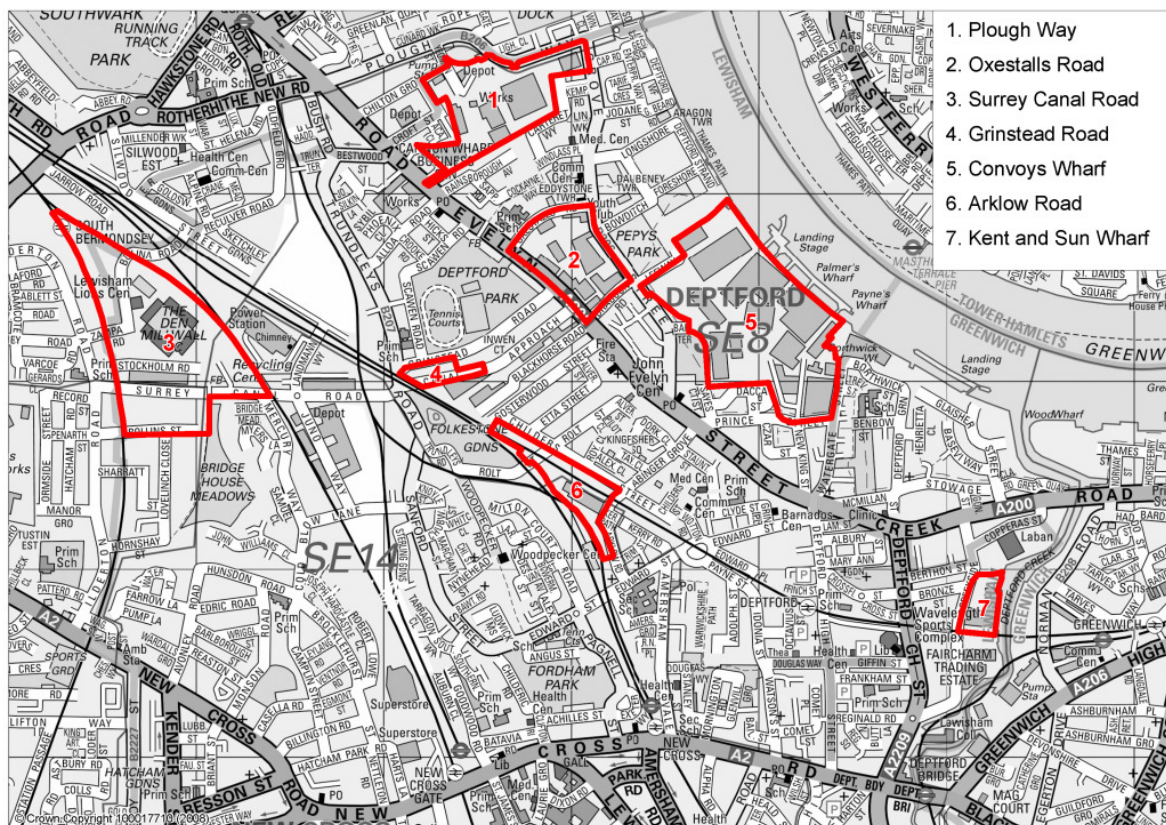
93 GLA Employment Forecasts 2006 to 2026

94 Chapters 5 and 6 of the ELS discuss the GLA employment forecasts for Lewisham for the period 2006 to 2026 and how these might be translated into the amount of floorspace needed to accommodate forecast growth, and supplies three scenarios as to how and where the business class floorspace could be provided

- Arklow Road and Childers Street
- Oxestalls Road
- Plough Way/Yeoman Street
- Surrey Canal Road/Stockholm Road/Bolina Road
- Grinstead Road and
- Kent and Sun Wharf

6.46 The sites are shown in figure 6.1.

Figure 6.1 Proposed Mixed Use Employment Locations including Convoys Wharf



6.47 These sites have been reviewed in the Lewisham Employment Land Study (ELS) 2008 and were discussed as part of the Employment Land Issues and Options⁽⁹⁵⁾ and Preferred Options⁽⁹⁶⁾ consultations. The designation of these sites as MELs involves the redesignation of 15.85 ha of SIL and the redesignation of one Local Employment Location (LEL) (8.22 ha). The release of this land is in line with the GLAs Industrial Land Release Benchmarks⁽⁹⁷⁾, which indicates that Lewisham should lose 49 ha of industrial land over the period 2006 to 2026.

6.48 The six sites put forward are considered to represent areas of older and poorer quality industrial use at low densities. Some have suffered from piecemeal development that disrupts the continuing industrial functioning of the area and others have been occupied by uses incompatible with adjoining residential areas such as a car breaker. It is considered that for a range of site specific reasons they do not perform the core functions of the SIL. Nor does the Council consider that designation of these sites as LELs would achieve the strategic aims of the Council for the regeneration of the borough.

95 2005

96 2007

97 Prepared by URS for the GLA, 2007

- The Arklow Road and Childers Street site is not considered to meet the requirements for designation as a SIL as it is tightly constrained by adjacent residential development. Many of the buildings are in clear need of repair and maintenance and in some cases substantial refurbishment. The site is unlikely to attract solely B Use Class development and is in need of redevelopment.
- The Oxestalls Road site is a large site with good access occupied by a mix of modern warehouses, older commercial and warehousing buildings, open sites and environmentally unfriendly uses. It is an open and visible site. The adjacent high density housing is adversely affected by the car breaking and scrap metal recycling activities which blight the site's overall quality. It is considered that the current industrial and commercial uses do not reflect the importance of the site, and large parts of it have not attracted investment over many years. Opportunities should be taken to provide better quality office and light industrial development with residential development that would provide higher density employment, address identified open space deficiencies and upgrade the environment. The scale of this site is such that redevelopment for solely B Use Classes is unlikely, and so it is recommended that this site should be redesignated from a SIL to a MEL.
- Plough Way/Yeoman Street is a LEL comprising a collection of sites with a variety of different uses of varying age and quality. The part of the site fronting Plough Way comprises relatively modern warehousing and office buildings was proposed in the previous Preferred Options Report ⁽⁹⁸⁾ as a LEL. There is an area of lower quality yards and poorly maintained industrial buildings, and a modern business centre which was proposed as a MEL. The modern industrial/office buildings on Plough Way have been reviewed as part of the ELS and are now considered to be isolated and unlikely to attract new occupiers in their current form. The business centre, although occupied by office users is a converted industrial building. The site as a whole presents a comprehensive regeneration opportunity; due to its size and location it is unlikely to attract solely B use Class development and is therefore recommended that this site should be redesignated from SIL to a MEL.
- The Surrey Canal Road/Stockholm Road/Bolina Road sites fall within the Surrey Canal SIL. The Orion Business Centre is within this SIL, whose functioning would be affected by the arrival of the Surrey Canal Road Station as part of the East London Line extension ⁽⁹⁹⁾. Although the modern business centres in this area function well, other parts of the area, in particular the Excelsior Industrial Estate, are very much in need of upgrading and investment. It is considered that the area as a whole presents a degraded, low quality environment. Opportunities should be created to ensure that regeneration takes advantage of the proposed new station and the existing leisure facilities at Millwall Stadium to create a new quality destination in an area which is relatively devoid of local facilities. It is therefore recommended that these sites, including the Millwall Stadium area, should be redesignated from SIL to a MEL.
- Grinstead Road is a small site adjacent to Deptford Park and a residential estate. Its environmental quality is very poor and has suffered from a recent major fire. It is not considered to meet the locational requirements for a SIL, nor to be an attractive location for a sole B Use Class development. It is recommended that this site should be redesignated from SIL to a MEL.
- The Kent and Sun Wharf area falls within the Creekside Opportunity Area, which is also identified as a location where the Council wishes to encourage creative businesses,

98 2007

99 Phase II

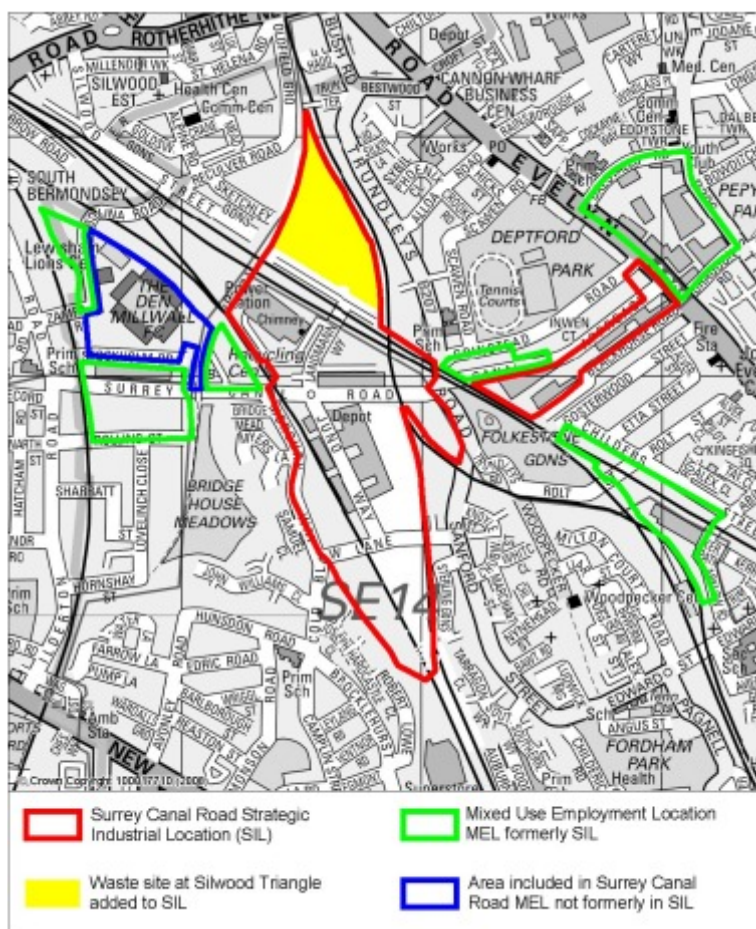
building on the presence of the Trinity Laban Centre and the creative uses in the LEL to the south of this site. It is considered that the current format of development in this area, which comprises a modern warehouse building and yards at Sun Wharf and older warehouses at Kent Wharf do not support the Council's aspirations for the Opportunity Area. The site is a LEL and it is recommended that it be redesignated as a MEL.

6.49 Regeneration by mixed use schemes would:

- make the best use of the available land in order to achieve regeneration objectives
- attract further investment to the area and increase the contribution these sites make to the vitality and viability of the local economy by accommodating emerging business sectors in the local and London economy, and providing local training opportunities ⁽¹⁰⁰⁾
- provide a 'sense of place' through new buildings and contributing to an enhanced street environment that would raise the overall standard of design and environmental quality and improve the permeability and accessibility of the area by providing new landmarks and links reducing severance
- deliver a radical improvement in the physical quality of the urban environment. A fundamental objective and requirement of the redevelopment of these sites. This will improve the overall appearance of these areas and attract further investment to a part of the borough where the environment is poor, morale is low, and unemployment and levels of deprivation are high.
- address severance issues. Extensive severance occurs to sites in the Surrey Canal Road area due to the number of railway viaducts that criss-cross the borough and the physically forbidding nature of many of the routes. Particular problems in this respect occur at Bolina Road, Folkestone Gardens (Trundleys Road), Cold Blow Lane and at Rolt Street. New mixed use development would be expected to improve the connectivity of these sites with the rest of the borough by providing new access routes to stations, improving pedestrian connections and their environmental quality, making contributions to improving public transport facilities and infrastructure, and to local public open spaces.
- alter greatly the relationship between Deptford, New Cross and the River Thames by improved connectivity to the river and increasing visual and physical links.

6.50 The area to be defined as the Surrey Canal SIL under Strategic Spatial Option 1 is shown in Figure 6.2.

Figure 6.2 Proposed boundary for the Surrey Canal Road Strategic Industrial Location



New Cross and New Cross Gate

6.51 Regeneration in **New Cross** would continue through:

- the renewal of the Kender Estate
- removal of the Kender Triangle gyratory system, creation of 'Streets for People' and the wider streetscape enhancements and
- the provision of the New Cross Gate New Deal for Communities Centre.

6.52 Development sites within New Cross (excluding any mixed use sites) have the potential to deliver at least 700 new homes ⁽¹⁰¹⁾.

6.53 The existing New Cross District Centre would be combined with the adjoining New Cross Gate Local Centre to become a larger District Centre within the retail hierarchy. Its role within the night economy and relationship to the adjoining Goldsmiths College are crucial for vitality and viability. With the opportunities at the existing New Cross Gate Sainsbury's store and the improvements to the New Cross Gate rail station, combining the two centres will help strengthen their role and function to provide goods and services to the local area.

101 New Cross Hospital site, New Cross Gate Station sites, Kender Estate

Activity hubs

- 6.54** **Blackheath, Downham, Forest Hill, Lee Green and Sydenham** would be designated as 'activity hubs' and District Town Centres within the retail hierarchy. These places form concentrations of local activity, supported by good public transport, and serve as a focal point for the adjoining residential catchment. The heart of an activity hub is a District Town Centre predominantly anchored by retail uses. However, these town centres are increasingly becoming locations for a wider mix of uses including cafés, restaurants, night time economy uses and other service-related businesses.
- 6.55** There is a diversity of purpose and physical form of the activity hubs in the borough. This ranges from Blackheath which forms part of an important conservation area and contains valuable historic assets; Sydenham linear centre and Lee Green crossroads which follow a traditional high street pattern and have limited scope for major new development; Forest Hill which has underutilised land and regeneration potential, and Downham where redevelopment can continue to assist social regeneration objectives.
- 6.56** An important factor in the prosperity of these district centres is the proximity of the surrounding residential areas, which benefit from the availability of goods and services and the provision of public transport. Additional retail floorspace, smaller scale mixed use development (including housing), leisure and other town centre uses and facilities will be focused in these centres. New development will maintain and enhance the status of each town centre and improve their attractiveness, accessibility and environment.
- 6.57** Areas immediately surrounding the town centres within each activity hub will be potential locations for intensification of the development pattern where opportunities exist and relate to the activity hub's public transport accessibility level. These areas will form a transitional zone between a town centre, where a greater intensity of development could be expected and is considered appropriate, and the wider residential areas, which have an established development pattern providing less opportunity for change. Importantly, conservation areas would continue to be protected.

Local hubs

- 6.58** **Brockley Cross, Hither Green and Bell Green** would be established as 'local hubs'.
- 6.59** Brockley Cross and Hither Green are well served by public transport and contain opportunities as a result of the availability of development sites located within close proximity to the local shopping parade. The focus of these local hubs will be to maximise the redevelopment potential of the available development sites, secure their regeneration, and ensure integration with the surrounding largely residential area and the local shopping parade.
- 6.60** Clusters of small local employment sites at Brockley Cross (1.2 ha) and Hither Green (2.12 ha) would be released for mixed-use development. Brockley Cross has the potential to deliver up to 120 new homes and Hither Green up to 110 new homes by 2025.
- 6.61** The existing retail and business area of **Bell Green** would be designated as an 'out-of-centre' retail and business area within the retail hierarchy and a 'local hub'. This serves an immediate and wider catchment. The retail site has the opportunity to expand over the plan period through additional retail and office floorspace approved through a planning application ⁽¹⁰²⁾. The focus of this local hub is to maintain its retail focus and create a location for office and business uses. Expansion will provide up to 16,110 square metres of retail space, 10,660 square metres of employment floorspace and 156 homes.

Areas of stability and managed change

- 6.62** The **remaining areas** of the borough would be designated as 'areas of stability and managed change'. These parts of the borough are largely residential or suburban in character and the urban character, form and development pattern are established. These areas contain the majority of the borough's housing, local shops and services, and areas of open space. There are fewer opportunities for major development or physical change as compared to localities within the Growth and Regeneration Corridor and Activity Hubs.
- 6.63** As a result of the historical pattern of residential and retail development - the protection of certain areas by Conservation Area designations, and the existence of large areas of open space - these parts define the wider character of the borough and through a network of small scale shops, services and facilities contribute to residents' well-being.
- 6.64** Much of the development that will occur is expected to be small scale, infill residential development, the conversion of houses to flats, changes of use of shops or small business premises, and alterations and extensions to buildings. Larger development opportunities will arise from sites near the Bromley Road and Southend Lane intersection and the renewal of former local authority housing estates (for example the Excalibur bungalow estate in Downham and Heathside and Lethbridge near Blackheath).
- 6.65** Significantly, two wards in this policy area, Bellingham and Downham, are in the worst 10% of wards in England according to the Indices of Multiple Deprivation ⁽¹⁰³⁾. Regeneration projects will continue estate renewal and will build on existing programmes through the Downham Healthy Lifestyle Centre and the Bellingham Children's Centre.
- 6.66** There would be a managed approach to piecemeal development of infill backland and windfall sites, and alterations and additions to buildings, in accordance with accepted urban design principles, and the maintenance and improvement of the overall urban quality of the borough

102 The LB Lewisham Strategic Planning Committee resolved to approve the planning application on 16 June 2005 and 14 July 2005

103 2007

and the existing character of residential areas, including listed buildings and conservation areas. This area is expected to contribute at least 2,000 additional homes over the plan period.

- 6.67** Neighbourhood and local shopping centres and parades, along with a range of community and recreational facilities, would be provided, retained and protected.
- 6.68** The Strategic Industrial Location (SIL) and Local Employment Locations (LELs) throughout this area would be retained and protected. This would comprise the **Bromley Road SIL** (as shown in Figure 6.3) accounting for 8.28 ha and LELs accounting for 10.63 ha⁽¹⁰⁴⁾.

Figure 6.3 Boundary of the Bromley Road Strategic Industrial Location

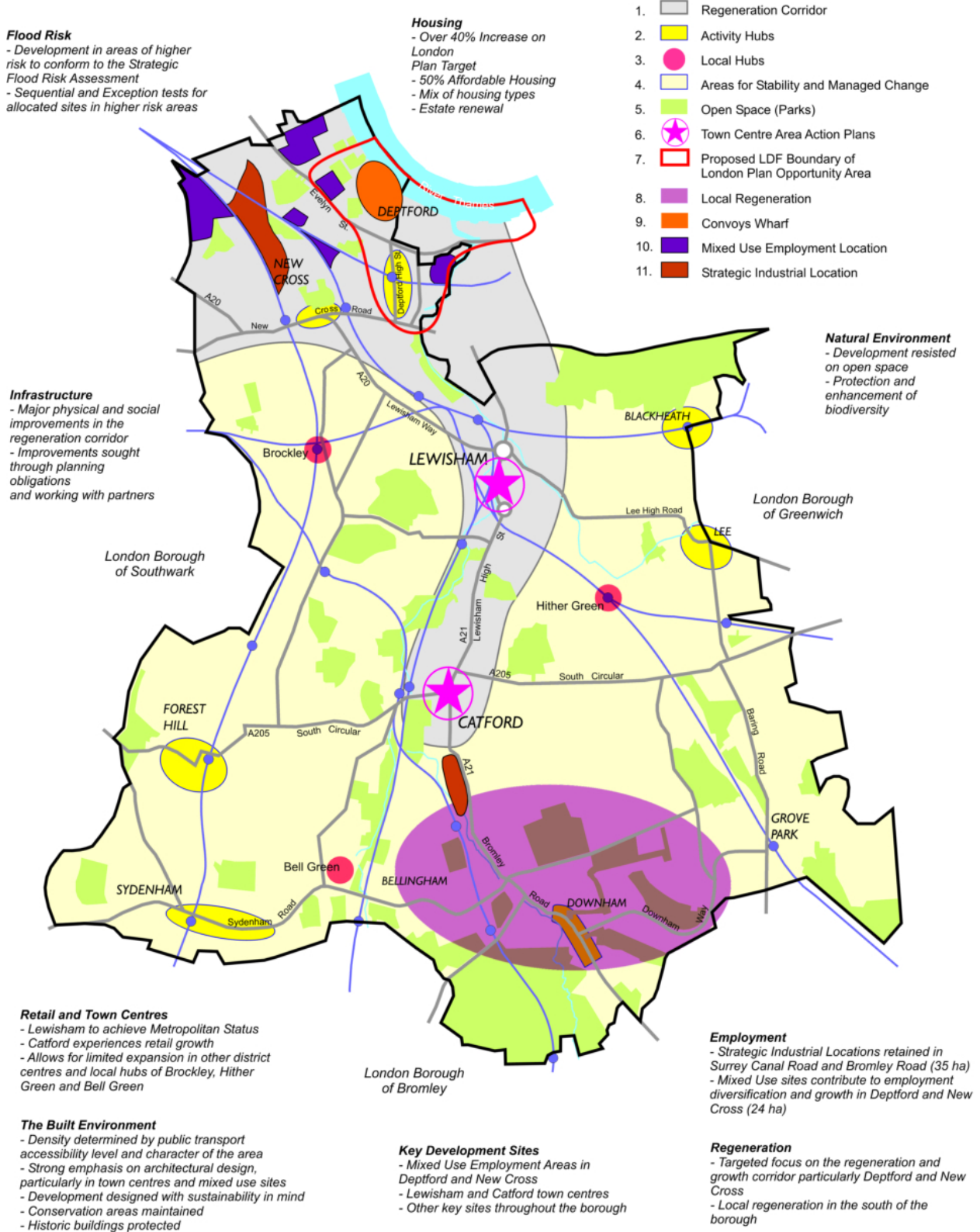


- 6.69** The spatial hierarchy and key areas for regeneration and growth to be delivered under Strategic Spatial Option 1 are shown in Figure 6.4.

104 Blackheath Hill (0.32 ha), Manor Lane (2.75 ha), Malham Road (3.63 ha), Willow Way (0.86 ha), Clyde Vale/Perry Vale (0.9 ha), Worsley Bridge Road (1.20 ha), Stanton Square (0.97 ha)

Figure 6.4 Key characteristics of Strategic Spatial Option 1

Option 1 - Borough-wide Regeneration and Growth Corridor



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

Rationale

- 6.70** The regeneration and growth corridor designations provide a clear basis and focus for the provision of new homes and jobs and for Lewisham to contribute to national and regional policy objectives, particularly in relation to housing and economic growth, contributing to local regeneration.
- 6.71** Strategic Spatial Option 1 responds to the borough's constraints by releasing employment land for mixed use development primarily involving housing and new employment sectors. Development opportunities are limited within the borough and the larger sites available for redevelopment are located in the Deptford and New Cross area and the major town centres of Catford and Lewisham. By directing growth to these areas, this ensures the character of the borough's conservation areas and the limited and finite supply of green and open space are protected.
- 6.72** The need to travel is reduced by directing development to areas in and around the town centres, these centres providing a range of services. They are also areas of high Public Transport Accessibility Levels (PTALs), the town centres being nodes on the rail, bus, London Overground and DLR networks. Consequently, directing development to these areas also reduces the need to travel.
- 6.73** Where the PTAL is currently low, as is the case for areas north of Deptford and in the south of the borough, improvements through development opportunities would be required particularly to the walking and cycling environment.
- 6.74** The opportunities surrounding the East London Line extension support the inclusion of development sites in and around the district town centres of Forest Hill, Brockley Cross, New Cross and New Cross Gate, while excellent public transport accessibility would support smaller scale development opportunities for Hither Green.
- 6.75** The Council recognises that there needs to be a proactive approach to support and improve the two wards in the north of the borough with the highest levels of deprivation⁽¹⁰⁵⁾. Local regeneration and renewal would significantly improve the most deprived areas by delivering a radical improvement in the physical quality of the urban environment. This would involve improving public transport accessibility and pedestrian and walking connections, providing a greatly improved, high quality public realm and additional open space.
- 6.76** The Deptford New Cross area is the location for most of the borough's remaining areas in industrial use. The Lewisham Employment Land Study (ELS) 2008 has shown that some of these industrial sites are under-used and no longer perform an appropriate function within the strategic and local economy⁽¹⁰⁶⁾. Most of these sites are currently included in the London Plan as part of the Surrey Canal Strategic Industrial Location (SIL). One site is designated as a Defined Employment Area (DEA) in the Lewisham Unitary Development Plan 2004 and is a site considered to function as an employment location of local significance.
- 6.77** On balance it is considered that the sites represent regeneration opportunities which outweigh the desirability of retention of the existing industrial uses but which could increase the contribution the sites make to employment growth sectors, to implement the Council's strategic regeneration objectives.

105 Evelyn and New Cross, 2007 IMD

106 Refer to Employment Land Study and Core Strategy Options Section 7

Development allocation

Under Strategic Spatial Option 1, by 2025 development has the potential to be allocated as follows:

| Housing | Quantity (number of new homes) |
|--|--------------------------------|
| Lewisham town centre | 3,400 |
| Catford town centre | 1,950 |
| Deptford New Cross (DNX) | 2,050 |
| DNX Mixed Use Employment Locations | 7,400 |
| South of the borough | 750 |
| Existing commitments elsewhere in borough ⁽¹⁰⁷⁾ | 2,100 |
| Future commitments elsewhere in borough ⁽¹⁰⁸⁾ | 4,000 |
| TOTAL | 21,650 |

| Employment | Area (ha) |
|---|--------------|
| Strategic Industrial Location - Surrey Canal Road (SIL) | 27.61 |
| Strategic Industrial Location - Bromley Road (SIL) | 8.28 |
| Mixed Use Employment Locations (MEL) | 24.07 |
| Local Employment Locations (LEL) | 10.63 |
| TOTAL | 70.59 |

Existing employment floorspace commitments

Existing commitments of new employment floorspace of 162,326 m² (including Convoys Wharf at 72,700 m²)

New employment floorspace at MELs

New and reconfigured floorspace ranging between 54,000 m² and 106,800 m² at MELs ⁽¹⁰⁹⁾.

107 Current planning applications
 108 Analysis of past trends
 109 See Chapter 6 Lewisham ELS 2008

Net total additional employment floorspace

The redevelopment of MELs will result in a loss of existing industrial floorspace. This would result in a total net extra supply of 174,000 m² (including existing floorspace commitments) if the highest floorspace development range at MELs were to be implemented, and a total net extra supply of 74,600 m² if the lower end of the floorspace range of the MELs were to be implemented⁽¹¹⁰⁾.

Offices located in Lewisham and Catford town centres.

Retail

34,000 m² net additional retail floorspace for Lewisham town centre

18,000 m² net additional retail floorspace for Catford town centre

- 6.78** The development allocation numbers for housing are based on the capacity of large sites identified by the Council which have either received planning permission, are currently undergoing pre-application discussions or are expected to be delivered within the time period of the Core Strategy. For ease of quantifying capacity, and providing a 'snapshot' of what Strategic Spatial Option 1 would deliver, the housing numbers have been rounded up or down to the nearest quantity of 50. Appendix 5 provides specific site details.

6.6.3 Sustainability appraisal

- 6.79** The key issues identified through the Sustainability Appraisal (SA) have been highlighted below.

Economic

- 6.80** Strategic Spatial Option 1 contributes positively towards economic objectives. There is the potential to attract further investment to the area and increase the contribution the proposed Mixed Use Employment Locations (MELs) make to the vitality and viability of the local economy, by increasing the numbers of jobs and training available to local people and reducing the need to commute for employment. However, 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. Implementation will be crucial to ensure job retention within the borough, albeit in new sectors.

Environmental

- 6.81** Obvious key concerns relate to flooding in the regeneration corridor, specifically within the town centres of Catford and Lewisham, and for key development areas within Deptford and New Cross. The Council's SFRA and the subsequent Sequential Test have shown that the proposed land uses are acceptable. The land uses' acceptability will be improved subject to recommended approved mitigation techniques outlined in the SFRA. If these were not implemented, then the proposed use would not be permitted.

¹¹⁰ These floorspace projections are based on illustrative scenarios in Chapter 6 of the Lewisham ELS 2008. The GLA Employment Projections for 2006 to 2026 are discussed in Chapter 5. The lower floorspace figure quoted for MELs assumes a land use split of 80% for residential development

- 6.82** The design of new development and the public realm is of critical importance. New development has the opportunity to raise the overall standard of design and environmental quality and improve the permeability and accessibility within the borough, particularly in the Deptford and New Cross area, by the provision of new landmarks and links within the area and to the Thames. This would contribute to helping to solve the problems of physical severance caused by railway viaducts and an increase in the connectivity of the MELs to the rest of the borough, particularly new access routes to stations. Implementation is crucial.
- 6.83** Site redevelopment for MELs is also considered to assist in reducing the amount of hard-standing and hard surfaces. This would be achieved by the provision of gardens, green roofs and new drainage, impacting positively on environmental objectives, as would the relocation of unneighbourly uses such as car breakers.
- 6.84** The quantum of development opportunities proposed in Deptford and New Cross presents the possibility of a waste to energy scheme provided by the South East London Combined Heat and Power (SELCHP) plant . This would have a positive environmental impact.
- 6.85** Spatial considerations are also relevant in terms of the amount of green space to be provided and conversely the amount of green space to be lost or not replaced. Mitigation measures would need to ensure qualitative improvements to public open space, resiting its loss and making on-site provision where appropriate.
- 6.86** Transport considerations are vital since key development sites in the Evelyn ward have a low PTAL and accessibility needs to be improved for both the existing and new communities. Site development would reduce physical severance in the Evelyn and New Cross wards and provide the potential to improve low PTAL. 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 increased on-street demand. A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in demand for travel by car arising from development intensification. However, funded and planned infrastructure improvements should address capacity concerns.

Social

- 6.87** An increase in the housing provision over the plan period over and above the London Plan target, if development of all the 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.
- 6.88** The inclusion of the New Cross and Evelyn wards ⁽¹¹¹⁾ for significant regeneration would promote social inclusion and improve socio-economic conditions. The provision of job opportunities within the borough is likely to have a positive effect. The creation of new places provides the opportunity for community facilities, and local shopping and leisure facilities in an area of the borough where provision is lacking.

111 Indices of Multiple Deprivation of 138 and 122

Question 13**Strategic Spatial Option 1: Borough-wide regeneration and growth**

Do you support Strategic Spatial Option 1?

Question 14**Strategic Spatial Option 1 expression**

Do you feel the option is expressed clearly?

Question 15**Other ways**

Do you think there are other ways the borough could provide for regeneration and accommodate growth while at the same time meeting national and regional government requirements?

Question 16**Further comments**

Are there any further comments relating to Strategic Spatial Option 1?

6.7 Strategic Spatial Option 2 - Moderate approach to regeneration and growth

6.7.1 What is this option?

Option 2

Strategic Spatial Option 2 proposes a more modest approach to borough-wide regeneration and growth. Strategic Spatial 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 and
- existing Strategic Industrial Land and local employment areas would continue to be protected.

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).

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. This would be the main focus for the borough's housing, retail and employment growth, and associated social and physical improvements. However, the quantum of redevelopment would be significantly less than in Strategic Spatial Option 1.

The second regeneration corridor would extend south of Catford Town Centre encompassing parts of the Whitefoot, Downham and Bellingham wards. Due to the lack of large development sites, regeneration would focus on estate renewal and social and economic projects.

6.7.2 Delivery

6.89 Strategic Spatial Option 2 would be achieved through a **spatial hierarchy** similar to that of Strategic Spatial Option 1 as follows.

- A **regeneration and growth corridor** covering Catford - Lewisham - Deptford - New Cross.
- **Activity Hubs** covering the town centres of Blackheath, Downham, Forest Hill, Lee Green and Sydenham.
- **Local Hubs** covering Brockley Cross, Hither Green and Bell Green.
- **Areas of stability and managed change** - the remaining areas of the borough.

6.90 The difference would occur in the regeneration and growth corridor. This is detailed below.

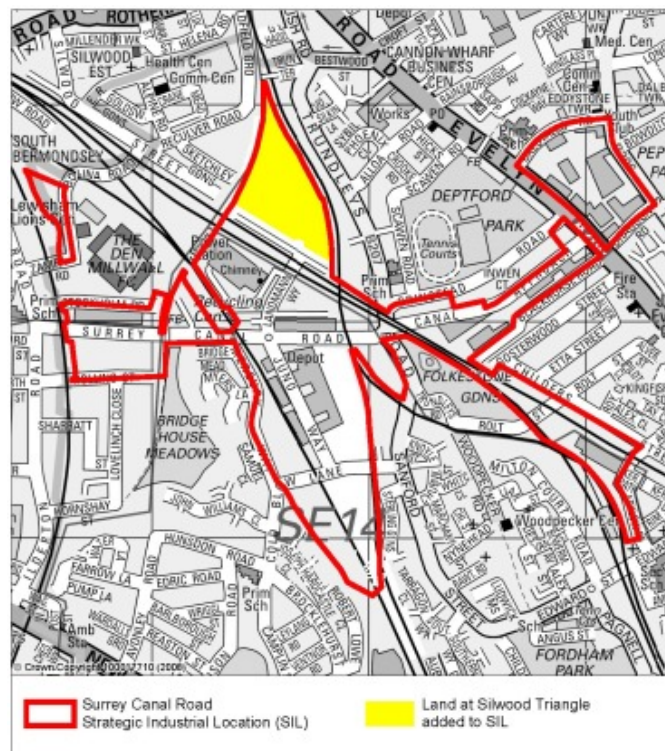
Deptford New Cross

- 6.91** The area will contain a core supply of employment land which will be designated as Strategic Industrial Land (SIL) amounting to 43.46 ha, to enable the continuing industrial functioning of London. This would primarily be focused in and around the Silwood Triangle. The borough's employment base would remain centred around services to the City which require locational proximity⁽¹¹²⁾ and local services based in small purpose built estates.

Mixed Use Employment Locations

- 6.92** The Kent and Sun Wharf would be the only site designated as a Mixed Use Employment Location (MEL). This is located within the Creekside Opportunity Area. The Opportunity Area has been identified as a location where the Council wishes to encourage creative businesses, building on the presence of the Trinity Laban Centre and the creative uses in the Local Employment Location (LEL) to the south of this site. It is considered that the current form of development in this area, which comprises a modern warehouse building and yards at Sun Wharf and older warehouses at Kent Wharf, does not support the Council's aspirations for the Opportunity Area. Redevelopment would be for a high density mixed use development generating at least 350 jobs, new training opportunities and 300 new homes.
- 6.93** Figure 6.5 shows the extent of the Surrey Canal SIL under Strategic Spatial Option 2.

Figure 6.5 Proposed boundary of the Surrey Canal Strategic Industrial Location

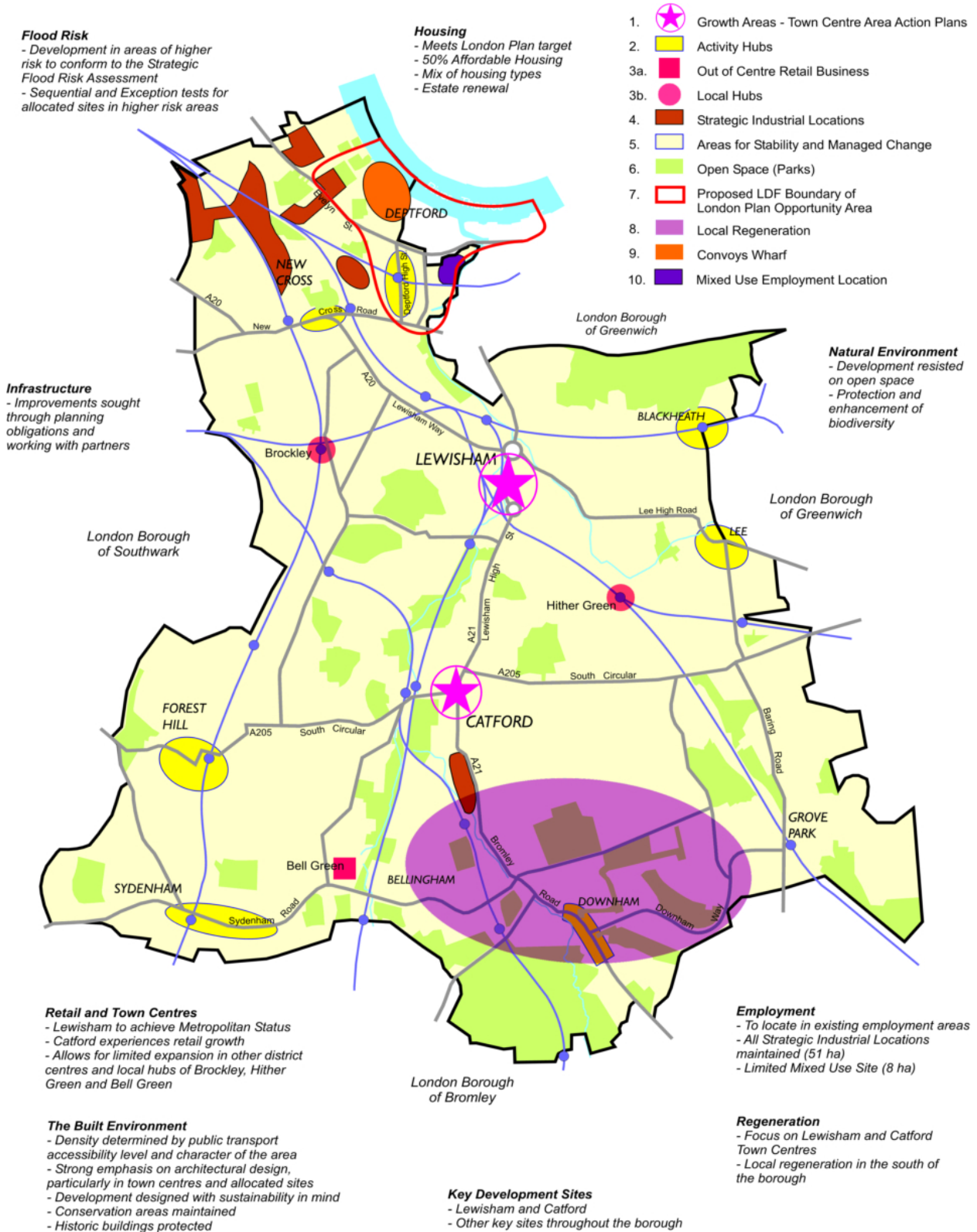


- 6.94** The spatial hierarchy and key areas for regeneration and growth are shown in Figure 6.6.

112 Such as printing, car repairs, small scale warehousing

Figure 6.6 Key characteristics of Strategic Spatial Option 2

Option 2 - Moderate approach to regeneration and growth



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

Rationale

- 6.95** As in Strategic Spatial Option 1, growth is directed to those areas where public transport accessibility can be maximised and the necessary transportation infrastructure can be improved and delivered as part of the overall planning approach. Regeneration initiatives will be focused and integrated across a range of projects and implemented through varied partners.
- 6.96** The growth areas contain the borough's two major town centres Lewisham and Catford and development opportunity areas within Deptford and New Cross. This would create a destination of exceptional quality, two bustling urban centres in Lewisham and Catford with first class shopping and leisure facilities. The character of the borough would also largely be maintained as growth is directed to those areas where development opportunities exist and the benefits of regeneration can be delivered on a wider scale, albeit in a reduced capacity when compared to Strategic Spatial Option 1.

Development allocation

Under Strategic Spatial Option 2, by 2025 development has the potential to be allocated as follows:

| Housing | Quantity (number of new homes) |
|--|--------------------------------|
| Lewisham town centre | 3,400 |
| Catford town centre | 1,950 |
| Deptford New Cross (DNX) | 2,050 |
| Mixed Use Employment Location (DNX) | 300 |
| South of the borough | 750 |
| Existing commitments elsewhere in borough ⁽¹¹³⁾ | 2,100 |
| Future commitments elsewhere in borough ⁽¹¹⁴⁾ | 4,000 |
| TOTAL | 14,550 |

| Employment | Area (ha) |
|---|--------------|
| Strategic Industrial Location - Surrey Canal Road (SIL) | 43.46 |
| Strategic Industrial Location - Bromley Road (SIL) | 8.28 |
| Mixed Use Employment Location (MEL) | 8.22 |
| Local Employment Location (LEL) | 10.63 |
| TOTAL | 70.59 |

Existing commitments of 162,326 m² of new employment floorspace including Convoys Wharf offering 72,700 m² ⁽¹¹⁵⁾.

Kent and Sun Wharf MEL would see the replacement of the existing industrial warehousing floorspace at 8,300 m² with new and reconfigured employment space of between 5000 m² to 8,300m² ⁽¹¹⁶⁾.

Offices in Lewisham and Catford town centres

Retail

34,000 m² net additional retail floorspace in Lewisham

18,000 m² net additional retail floorspace in Catford

113 Current planning applications

114 Analysis of past trends

115 See Floorspace Supply Scenarios in Chapter 6 of the Lewisham ELS 2008

116 See Floorspace Supply Scenarios in Chapter 6 of the Lewisham ELS 2008

- 6.97** The development allocation numbers for housing are based on the capacity of large sites identified by the Council which have either received planning permission, are currently undergoing pre-application discussions or are expected to be delivered within the time period of the Core Strategy. For ease of quantifying capacity, and providing a 'snapshot' of what Strategic Spatial Option 2 would deliver, the housing numbers have been rounded up or down to the nearest quantity of 50. Appendix 5 provides specific site details.

6.7.3 Sustainability appraisal

- 6.98** The key issues identified through the Sustainability Appraisal (SA) have been highlighted below.

Economic

- 6.99** The regeneration of Lewisham Town Centre would provide a town centre of Metropolitan status within the borough, while the regeneration of Catford would reconnect the centre around a network of high quality public spaces. This would generally impact positively on the economic, environmental and social objectives.
- 6.100** Identified Strategic Industrial Land would be protected and this could provide the opportunity to strengthen these employment areas to ensure they become more functional in the current and future economic climate, and improve their contribution to the economic functioning of London as a whole, while the provision for Local Employment Locations would contribute to a diverse economic base.
- 6.101** There is, however, the potential failure to attract a wider economic base to the borough if industrial land designations remain largely unchanged.

Environmental

- 6.102** Population growth is likely to place pressures on the environment, particularly on local air quality, the use of open spaces and the consumption of natural resources. This leads to a negative impact on climate change. However, the Sustainability Appraisal shows that as major physical change would be focused in the Major and District town centres, and the Creekside London Plan Opportunity Area, where public transport accessibility is higher, this would impact positively on climate change by reducing the need to travel.
- 6.103** There would be negative environmental impacts arising from the continued operations of some unneighbourly uses in the north of the borough, which are located immediately next to residential areas.

Social

- 6.104** Regeneration as suggested in this option is likely to have positive impacts on health, safety and social inclusion, albeit on a more limited sphere than that outlined in Strategic Spatial Option 1. Housing development across the borough, and mixed use development in the larger town centres, would partly contribute to the borough's regeneration. However, borough-wide regeneration would be missed, impacting negatively on social objectives. The borough would not be taking full advantage of its Thames Gateway locality and the regeneration benefits this could bring particularly in parts of Deptford and New Cross.

- 6.105** Strategic housing targets would be met, contributing towards housing need and meeting housing demand as identified through the SHMA. However, if most of the strategic housing allocation is located in the town centres, opportunities for addressing the housing need in other locations could be missed.
- 6.106** There would be limited change in the borough's overall physical form, particularly with the status quo maintained for Strategic Industrial Land allocations. This limits the opportunities to address deprivation and radically improve the physical environment and overcome severance in the Deptford and Evelyn wards.

Question 17

Spatial Option 2: Meeting national and regional requirements

Do you support Strategic Spatial Option 2?

Question 18

Other ways

Do you think there are other ways the borough could provide for regeneration and accommodate growth while at the same time meeting national and regional government requirements?

Question 19

Further comments

Are there any further comments relating to Strategic Spatial Option 2?

6.8 Strategic sites

- 6.107** The Core Strategy can allocate strategic sites if the Council considers their allocation central to achieving the strategy.

Statement 8

Strategic sites

Core strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy. Progress on the core strategy should not be held up by non strategic sites ⁽¹¹⁷⁾.

But in general the core strategy will not include site specific detail which can date quickly. It may be preferable for the site area to be delineated in outline rather than detailed terms, with site specific criteria set out to allow more precise definition through masterplanning using an area action plan (if required) or through a supplementary planning document (SPD) ⁽¹¹⁸⁾.

- 6.108** In order to achieve both Strategic Spatial Options 1 and 2, the following are put forward for consideration as strategic sites with a brief rationale for their inclusion. The Council considers strategic sites to be those sites or localities that:

- achieve a wide range of regeneration benefits including new housing, jobs, environmental improvement and restoration, transport provision and improvements to accessibility
- significantly contribute to housing numbers and
- contribute to the continuing functioning of the Lewisham and London economy.

Lewisham Town Centre sites

- Lewisham has recently experienced, and is planned to continue to experience, retail and housing growth.
- Cumulatively, the sites can provide at least an additional 3,400 new homes and 34,000 m² retail space by 2025.
- The Council has an aspiration for the town centre to achieve Metropolitan status within the London retail hierarchy.
- The Lewisham Gateway Scheme will deliver £250 million of public and private investment including 800 new homes, shops, restaurants, bars, cafés, leisure facilities, a new park focused on opened up Ravensbourne and Quaggy rivers, a new road layout and a larger bus interchange.
- An area action plan will be prepared to facilitate delivery.

Catford Town Centre sites

- Catford is a major town centre and in need of revitalisation.
- The former Greyhound Stadium site will deliver up to 589 additional homes and improve links to the town centre.

117 PPS12 paragraph 4.6

118 PPS12 paragraph 4.7

- Redevelopment of the shopping centre will improve the public realm and retail mix and provide additional housing.
- An area action plan will be prepared to facilitate delivery.

Convoys Wharf

- This is the largest redevelopment site in the borough at 17 ha and takes up nearly half of Lewisham's River Thames frontage.
- Redevelopment has the potential to deliver up to 3,500 new homes by 2025, a new school, employment space, retail, leisure, community and wharf activities.
- Redevelopment would improve accessibility throughout this locality of the borough and provide direct access to the River Thames by implementing the Thames Path.

Deptford sites

- Site redevelopment will improve accessibility to Deptford High Street, provide new public space and a new railway station.
- Cumulatively site redevelopment would contribute at least 600 new homes by 2016.
- Provision is made for a new Tidemill School and community and leisure facilities.
- The sites would include:
 - Seager
 - Octavius Street
 - Giffin Street
 - Comet Street.

Bell Green

- After Convoys Wharf this is the second largest redevelopment site in the borough (9.86 ha).
- The site has the potential to deliver up to an additional 16,110 m² of retail space, 10,660 m² of employment space and 156 homes.
- Its role as an out-of-centre retail and business park needs to be managed to ensure it does not negatively impact on existing major and district town centres.

Mixed Use Employment sites (as it applies to Strategic Spatial Option 1)

- Collectively site redevelopment will deliver major regeneration benefits for the north of the borough and in the most deprived wards.
- Redevelopment will contribute to housing numbers with up to 4,170 additional new homes by 2025, employment provision in growth sectors, and major improvements in accessibility by reducing severance between sites and throughout the area.
- Details were provided in paragraphs 6.49 to 6.56 and include the following sites:
 - Arklow Road and Childers Street
 - Oxestalls Road
 - Plough Way/Yeoman Street
 - Surrey Canal Road/Stockholm Road/Bolina Road
 - Grinstead Road and
 - Kent and Sun Wharf.

Mixed Use Employment sites (as it applies to Strategic Spatial Option 2)

- The Kent and Sun Wharf would be designated as a Mixed Use Employment site. This has the potential to contribute up to 300 additional new homes and 350 new jobs.

Strategic Industrial Locations

- The borough will have two Strategic Industrial Locations (SILs) Surrey Canal Road and Bromley Road
 - Under Option 1 the Surrey Canal Road SIL will amount to 27.61 ha
 - Under Option 2 the Surrey Canal Road will amount to 43.46 ha.
- The Bromley Road SIL will amount to 8.28 ha under both options.
- The Surrey Canal Road SIL is the location for the borough's safeguarded waste sites.
- The SIL allocation would contribute to and enable the continuing industrial functioning of London.

Question 20

Strategic sites

Do you support the proposed strategic sites?

6.9 Infrastructure implications

- 6.109** PPS12 seeks to ensure that the Core Strategy considers the infrastructure required to support development.

Statement 9

Infrastructure

The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations ⁽¹¹⁹⁾.

- 6.110** A preliminary assessment has been made and details are provided in the following boxes. The Council will carry out a detailed infrastructure assessment before it prepares the draft Core Strategy. This will include a more detailed analysis of costs, sources of funding, delivery lead and timescales and any funding gaps that may need to be addressed.

6.111 The following (except where identified) are funded infrastructure schemes and programmes that are currently being delivered and would help deliver the two strategies outlined.

Physical

- Investment in **public transport infrastructure**,⁽¹²⁰⁾ specifically the Thameslink programme⁽¹²¹⁾, DLR three car capacity, and Phase I of the extension to the East London Line, will increase overall capacity for the borough and specifically those areas where growth is directed. This will be provided by TfL and Network Rail.
- Train station improvements and capacity enhancements for the East London Line extension stations will occur at New Cross Gate, Brockley, Honor Oak Park, Forest Hill and Sydenham including Access for All works between 2010 and 2015 totalling £730,000. This will be provided by TfL and the Council.
- Deptford Station will be replaced and a new public square provided connecting to Deptford High Street, improving station accessibility by 2011. This will be provided by Network Rail and the Cathedral Group.
- As part of the Lewisham Gateway scheme, there will be improvements to the Lewisham Interchange, removal of the Lewisham roundabout and the creation of a 'h' shaped street layout to rationalise the traffic movement and provide simple and safe pedestrian access directly from the station to the high street by 2011. This will be provided by TfL and Lewisham Gateway Developments Limited.
- Contributions arising from the development of the former Catford Greyhound Stadium will provide a pedestrian bridge across the railway to Doggett Street to link the site to the Catford town centre and the town centre to Ladywell Fields. This will be provided by the developer in consultation with Network Rail.
- There is an aspiration to implement TfL's long-standing plan to realign the South Circular (A205) to the south of Laurence House. TfL have prepared options and indicative costings for the works. The Council is actively working with TfL to ensure the project is included in the next round of the TfL works plan.
- A network of well connected and accessible walking and cycling routes would continue to be provided and upgraded across the borough, including Waterlink Way, Southeast London Green Chain, the Thames footpath, and connections in the Deptford and New Cross area through the implementation of Legible Lewisham and Deptford Links.
- Redevelopment in the Deptford and New Cross areas would provide the opportunities to link areas through clear pedestrian and cycling access routes to stations at Deptford, New Cross, New Cross Gate and adjoining borough stations at South Bermondsey and Surrey Quays, as identified in the North Lewisham Links Strategy⁽¹²²⁾. The works are currently part funded by the Council and Thames Gateway, and site redevelopment will need to contribute to these objectives.

120 As identified through Table 3C.1 of the London Plan

121 This will provide a 25% capacity increase over the period 2006 to 2025 through lengthening trains and platforms

122 LB Lewisham, May 2007

- The Council will actively lobby for the funding of Phase II of the East London Line extension – Surrey Quays to Clapham Junction and the new Surrey Canal Station, to greatly improve accessibility in this part of the borough with low PTAL levels.
- Enhancement to the street environment and major public realm improvements will occur through the removal of the gyratory system at Kender Triangle and reinstating two-way traffic at Queens Road and New Cross Road, resulting in street reclamation and better spaces for residents, pedestrians and cyclists, in partnership with Transport for London (TfL) by 2011.

Social

- The Building Schools for the Future (BSF) programme will see £186 million spent on rebuilding every secondary school within the borough. This is scheduled to be completed by 2016.
 - A new all-through school at the Lewisham Bridge Primary School site is scheduled to open in September 2010.
 - Overall school capacity within the borough will increase by 1,385 places.
- The Primary Capital Programme will see investment in Lewisham's primary schools.
- The New Horizons Project for adult learning will be based at the Downham Health and Leisure Centre and completed by 2011.
- Space for an additional primary school has been allocated a part of the Convoys Wharf redevelopment to expand capacity.
- Deptford Lounge, part of the Giffin Street redevelopment site, will provide a new public library, café, council one-stop-shop, with community rooms and ball court by 2010.
- A new leisure centre including swimming pool will form part of the Loampit Vale redevelopment in Lewisham Town Centre to be completed by 2012; the Forest Hill swimming pool will be replaced and updated by 2012; and the Wavelengths Leisure Centre at Deptford has recently ⁽¹²³⁾ been expanded and refurbished.
- Primary care facilities will be restructured to provide a system of 'polyclinics' in Lewisham. This will be delivered by the Lewisham Primary Care Trust.

Green

- An equal control of the protection of open space and biodiversity would be applied across the borough. Larger scale development would need to incorporate open space into the scheme, or seek improvements to access or make qualitative improvements to existing nearby open spaces.
- Sites of Nature Conservation Importance would be afforded a level of protection according to their status and species.
- Significant development in the Lewisham and Catford catchment would need to improve access and contribute to qualitative improvements for the Waterlink Way, East London Green Grid, London Cycle Network: Route 21, River Ravensbourne, Ladywell Fields, Lewisham Park, Mountsfield Park and Catford Bridge Park.
- Significant development in the Deptford and New Cross catchment would need to improve access and contribute to qualitative improvements for the Waterlink Way, East London Green Grid, the London Cycle Network: Route 21, River Ravensbourne, Deptford Creek, and the surrounding open spaces such as Brookmill Park, Fordham Park, Deptford Park and Pepys Park.
- The Ravensbourne River Corridor Improvement Plan will identify the opportunities for river restoration and naturalisation to allow extra storage capacity in times of flooding and to enhance local wildlife and habitats, in line with physical regeneration opportunities, along this river corridor.
- The Deptford Flood Alleviation Scheme will reduce flood risks to 500+ properties. This will be provided by the Environment Agency by 2012.

Utilities

Thames Water

In 2007, Thames Water commented on the Preferred Options for the Core Strategy and the Development Policies and Site Allocations Development Plan Documents, and provided the following comments:

'As part of our five year business plan Thames Water advises OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community. We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years.'

Given the anticipated phasing of development, it is considered that if extra capacity is required, the three to five year lead in time can be met.

Thames Water also proposed inclusion of the following policy on water supply and waste water development.

The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.'

Gas and electric

Gas and Electric companies did not respond to the consultation in 2007. Discussions on the implications of implementing Strategic Spatial Options 1 and 2 will need to commence and the findings detailed as part of the draft Core Strategy.

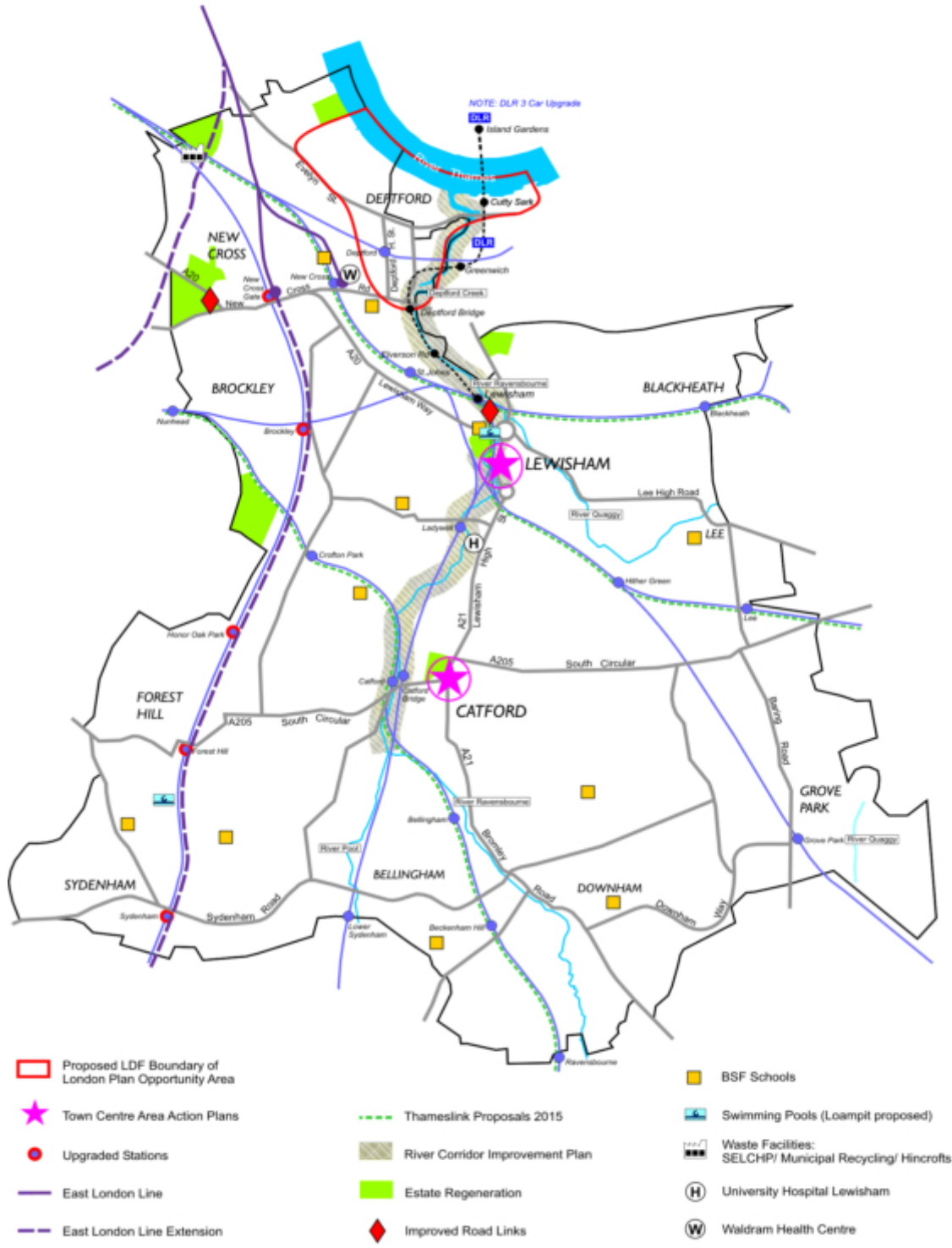
Question 21

Infrastructure

Do you feel infrastructure requirements have been adequately considered?

6.112 Figure 6.7 shows the committed infrastructure projects taking place in the borough.

Figure 6.7 Committed infrastructure projects
Committed Infrastructure Projects



Geographic Information & Research 2008
 Committed Infrastructure 2008

6.10 Deliverability

- 6.113** It needs to be remembered that the delivery of sites coming forward for development is uncertain and the major sites proposed for development contributing to the Council's regeneration objective are privately owned and in some cases in multiple ownership. Discussions held between LB Lewisham and land owners have provided an indication of broad timescales for delivery. This information has informed options for the allocation of land and indicative development capacity over the plan period.

Statement 10

Deliverable options

Local authorities should undertake timely, effective and conclusive discussion with key stakeholders on what options(s) for a core strategy are deliverable ⁽¹²⁴⁾.

- 6.114** The Council is holding and will continue to hold ongoing discussions with site owners and their agents to ensure development can be delivered. The identification of development sites, particularly for housing, does not in itself guarantee the identified housing capacity will actually come forward at all, or at the time indicated. It is based on the best available information.
- 6.115** However, there are a number of other projects, such as the Building Schools for the Future programme and the Primary Capital programme, a range of leisure projects and estate renewal, which provide another dynamic for regeneration. For these, timescales are clearer and the Council will have greater control as it is directly involved in project delivery.
- 6.116** The list of infrastructure projects related to transport are more or less guaranteed to be delivered as only funded projects are included, many of which are currently underway and will near completion between 2010 to 2012.
- 6.117** The key exceptions relate to Phase II of the East London Line extension (to provide a new station at Surrey Canal Road) and the realignment of the South Circular (A205) in Catford Town Centre. It is here where the Council will continue discussions with TfL and other interested parties and lobby for funding. However, delayed or non-delivery of the projects is not considered to jeopardise the delivery of either strategy outlined in Options 1 and 2.
- 6.118** Finally, there will be changing economic and market conditions over the plan period, as well as other factors (including changes in national planning policy and the London Plan) impacting on the delivery of the plan and its components. The full impacts cannot be predicted at this stage and will be monitored as part of the 'plan, monitor and review' process.

124 Planning Policy Statement 12, paragraph 4.27

6.11 Alternative spatial options

6.119 Alternative spatial options considered for the Core Strategy ⁽¹²⁵⁾ included:

- maintaining a status quo position as outlined in the current local development plan, the UDP
- adopting a position of dispersed growth across the borough where development is not focused in a particular centre
- adopting a purely housing-led growth and regeneration agenda.

6.120 However, these options were not carried forward into this round of consultation, as they are not considered reasonable or realistic in that they do not:

- meet national or regional policy requirements
- address the identified drivers of change
- proactively plan for the growth and change forecast to take place in the borough or
- reflect the local evidence base to build a sustainable Lewisham community.

6.121 Engagement with delivery stakeholders during the preparation of strategic spatial objectives for the Core Strategy options, particularly through the Local Strategic Partnership ⁽¹²⁶⁾, revealed they were keen to support options favouring borough-wide regeneration and growth. The LSP strongly thought the borough should be ambitious for itself and its citizens.

6.122 The general feeling was that major development will accommodate and align with the ambitions and plans of individual partner organisations and attract new people to the borough. The PCT noted the quantum of development would provide economies of scale for the provision of additional services and would also assist in providing increased contributions through planing agreements or the like. Transport providers indicated similar thoughts. The existing transport infrastructure improvements planned for the borough would contribute to deliverability, as would education improvements through the Buildings Schools for the Future programme.

6.123 Alternative options within Strategic Spatial Option 1 relate to the number and location of sites to be designated as Mixed Use Employment Locations (MELs). This could also lead to aspects of Strategic Spatial Option 2 (retaining a larger element of land designated as SIL) being incorporated to ensure deliverability.

125 As part of the Preferred Options in 2007

126 A briefing session and workshop was held on 11 July 2007 to discuss options

7.1 Section 6 outlined the two strategic options the Council is putting forward for the Core Strategy to guide regeneration and growth in the borough. This section addresses the specific issues that collectively would implement the strategy and provides further evidence to justify options. The options put forward in this section will be developed into policies in the draft Core Strategy.

7.2 Each issue has been grouped under the 'drivers for change' headings as follows:

- providing new homes
- growing the local economy
- climate change and environmental management
- building a sustainable community.

7.3 The following information is provided for each issue:

- an overview and summary of the issues to be resolved. This clearly shows what we need to address and include in the draft and final Core Strategy.
- a summary of the Issues and Options and the Preferred Options consultation results to show what the community and other stakeholders have told us
- a summary of the evidence or background reports to show the local characteristics and the key issues for Lewisham
- the possible options for the issue. The content of this would be carried forward and developed into policies for inclusion in the draft and final Core Strategy. This reflects the previous discussion relating to the evidence
- the justification for the possible options having regard to national and regional policy, strategy and guidance, the Sustainable Community Strategy, other council documents, and the Sustainability Appraisal
- a discussion of the alternative options and in certain places why the possible options are considered the most appropriate in light of consultation responses, sustainability appraisal and evidence
- measures the Council could take to implement and monitor the possible options
- a short risk assessment highlighting key impacts on delivery.

7.1 Homes for all

- 7.4** This section deals with options that can address the issues relating to housing need and provision.

7.1.1 Housing

- 7.5** The Core Strategy policy options relate to implementing strategic objective 1 by contributing to regeneration and facilitating development and strategic objective 2 by providing new homes to meet housing need.

Overview and summary of the issues to be resolved

- 7.6** The strategic housing objective for the borough is that everyone has the right to a decent, safe and affordable home, which is suited to their needs. The Government has identified housing as a key priority and Government guidance through PPS3 sets out the national planning policy framework for delivering the Government's housing objectives.
- 7.7** The Council needs to ensure that the borough is able to accommodate a sufficient quantity and mix of housing that is well designed and built to a high standard. We also need to include an overall target for the amount of affordable housing and to identify the size and type of affordable housing based on the housing needs of the borough. This should be based on housing need and demand through a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) identifying suitable land for housing over a 15-year period.
- 7.8** The London Plan has a strong focus on increasing London's supply of housing. It sets the policy framework for distributing housing capacity among the boroughs and for realising and monitoring that development. Policy 3A.1 seeks to achieve a minimum target for housing provision across London of 30,500 additional homes per year between 2007/08 and 2016/17. Table 3A.1 sets out the borough's housing targets. Lewisham's target is 9,750 units, which equates to 975 per annum. This target is made up of conventional supply (879), non-self contained (45) and vacant dwellings (73). The Council needs to show how and where this can be delivered. An indicative target of between 310 and 550 dwellings is provided beyond 2017 until 2025.
- 7.9** London Plan Policy 3A.2 states that Development Plan Document policies should aim to exceed figures in Table 3A.1. This should be done within the context of addressing the suitability of housing development in terms of location, type of development and impact on the locality, identify new sources of supply as well as a review of existing identified housing sites, and monitoring housing approvals and completions against both the targets set out in Policy 3A.1 and respective borough targets.
- 7.10** The London Plan also places a strong emphasis on the provision of affordable housing and adopts a strategic target that half (50%) of all additional housing should be affordable (Policy 3A.9). This is seen as strategically important in order to promote mixed and balanced communities and to meet the needs of households who cannot afford decent and appropriate housing in their borough.
- 7.11** A further consideration relates to ensuring the needs of gypsies and travellers are met. Government Circular 01/06 (Planning for Gypsy and Traveller Caravan Sites) requires boroughs to consult with gypsies and travellers in order to ascertain what their needs and intentions are in order to determine if site provision is adequate. The Council currently

operates a gypsy and traveller site in Thurston Road near Lewisham Town Centre. The site has the capacity for five residential pitches. However, as this site will be redeveloped as part of the Lewisham Gateway proposal, the Council will need to identify a new site.

7.12 The Core Strategy policy areas proposed to be covered include:

- housing provision
- affordable housing
- housing tenure
- housing mix
- lifetime homes
- accessible housing
- gypsies and travellers.

7.1.1.1 Previous consultation responses

Summary of the Issues and Options consultation

7.13 There was concern over the pressures that the increased housing targets for the borough would place on infrastructure, especially health, education and other community and leisure services. The Council should recognise that the nature and size of new housing will create different needs, especially for services and facilities. It was felt that social and family housing would generate more needs.

7.14 The need for housing mix policies was supported if it was applied broadly for all housing or specifically to affordable housing. Representations noted that the greatest housing demand is from the social rented sector and provision should be made for key worker housing.

7.15 The Greater London Authority (GLA) noted that the Council needs to set a borough-wide affordable housing target consistent with Policy 3A.7 in the London Plan. Other community and stakeholder responses supported current UDP policy or a range of affordable housing targets from 20% to 50%. There was also widespread support for reducing social housing in areas with currently high provision. However, decisions should be made on a case by case basis.

7.16 Other points raised included support for the provision of special needs and specialist housing, subject to controls to ensure there is not a concentration in one area; limiting the amount of housing required to be built to Lifetime Homes standards due to the additional costs involved; and ensuring the design of new housing is integrated and compatible with existing residential areas.

7.17 More than half of the responses supported setting a preferred mix for affordable housing and for all housing types on large sites (60 dwellings or 2 ha). The GLA supported setting a preferred mix for affordable housing and broad criteria for market housing.

7.18 The Lewisham Disability Coalition supported the aims for all dwellings to be of Lifetime Homes standard with a threshold for wheelchair housing. They were concerned that this provision should be integrated with other housing types.

Summary of the Preferred Options consultation

7.19 Overall, the representations felt the Preferred Options were too general, needed to be based on evidence and did not include adequate implementation or monitoring measures.

- 7.20** The Government Office for London (GOL) advised that the Council should explore all opportunities for the provision of additional housing and recognise housing need as stated in PPS3. It was felt that flood risk and how this may affect housing mix and location had not been adequately considered. This point was supported by the Environment Agency. There was also a lack of detail about how housing targets will be achieved, if there are specific areas targeted for housing growth, and if certain types of housing mix are needed for certain areas. In line with Government guidance the Council should indicate future housing provision beyond the 2016/17 plan period and acknowledge that the housing targets are minimums.
- 7.21** Both the GOL and the GLA felt the issue of affordable housing needed to be dealt with more thoroughly. A borough-wide affordable target had not been set, and the target of 35% was significantly below the London Plan strategic target of 50%. There was also no site-specific element to the affordable housing policy, nor any reference to 100% affordable housing schemes. Representations from developers felt that setting a specific affordable housing figure could have a detrimental effect on the viability of development and may prohibit housing development in the area. The Lewisham Pensioners' Forum questioned whether the affordable housing target was sufficiently ambitious.
- 7.22** Most representations noted that the housing mix should be based on evidence, which seemed lacking. It was also important that housing delivery include a good proportion of three and four bedroom properties. However, the Council needed to recognise the suitability of housing types to their location – family housing may not be suitable for a high density town centre location.
- 7.23** The need for housing mix was overwhelmingly supported. However, developers felt the approach put forward was too prescriptive and needed flexibility. There should always be an appropriate level of flexibility to determine requirements for a site based on market and commercial considerations. The GLA noted that housing mix was significantly below the mix within the Mayor's Housing SPG. Representations from developers felt that the mix in affordable housing units should be determined having given due consideration to the partner RSLs experience and knowledge of demand unless the Council had better evidence based on a Housing Market Study. Community groups expressed concern that the proposed new housing would result in gentrification and would not be accessible to existing communities, and that the Council was not able to specify the mix of private housing. Additionally, conversions of larger houses into flats were resulting in a reduction in family housing.
- 7.24** The quantum of housing to be provided in the borough was questioned. A number of representations felt the local environment was being altered as a result of the pressure to increase the number of housing units – particularly the change resulting from a loss of both larger family houses (four bedroom and above) and suburban gardens. The need for provision of safe and accessible open space in areas of densely developed housing was emphasised.
- 7.25** This time round there was more support for Lifetime Homes. However, some representations felt the Council should specify which Lifetime Homes standards are sought.
- 7.26** For gypsies and travellers, the GLA noted that the London-wide study of gypsy and traveller accommodation needs was not due for completion until late 2007. However, once the study was finalised, and targets identified and adopted, the GLA expected that this would be included within borough policy.

7.1.1.2 What does the evidence say?

- 7.27** The population is changing and so are the types of housing that is needed. The Lewisham Strategic Housing Market Assessment (SHMA) found there is a significant need for more housing provision in Lewisham. As mentioned in Section 2, a dramatic change has taken place in the tenure of property in the borough. The amount of private rented properties has doubled and comprises nearly 30%. Conversely social rented properties have fallen to almost the same level, while properties owned outright or with a mortgage have decreased by 10% and comprise 40%.
- 7.28** The average property prices in Lewisham are the fifth lowest in London, though average property prices in the borough increased from £155,000 to just under £205,000 between 2002 and 2005, and is currently £253,000 ⁽¹²⁷⁾, a 47% increase over the past five years.
- 7.29** Just over 40% of the households in the borough have a gross annual income of £15,000 or less. This measure of income is more important than individual earnings for housing purposes because household income gives a better guide to how much a household can afford to spend on housing. Affordability for first-time buyers has declined sharply since mid 2003 with fewer than 5% of all sales less than £100,000 and 85% selling for over £150,000 ⁽¹²⁸⁾.
- 7.30** The modelling results from the Lewisham SHMA suggest that there is a five year net housing requirement of 6,775 additional homes across all tenures. The model of housing requirements demonstrates a very diverse pattern. There is a clear need for 2 bedroom market dwellings, but a surplus of 1 bedroom market dwellings. There is also a high requirement for smaller social rented dwellings and for social rented dwellings with four or more bedrooms.
- 7.31** The assessed need for market housing in Lewisham is 3,665 dwellings over the next five years. There is a surplus of three and four bedroom dwellings, but a clear requirements for smaller market properties. There is also a clear role for mainly two, three and four bedroom intermediate housing products. There is an assessed need for social housing of 9,757 dwellings over the next five years, with a clear requirement for one, two and four plus bedroom dwellings.
- 7.32** Over the last six years just over 4,300 new dwellings were completed across Lewisham, comprising 1,300 new social rented units and 400 intermediate affordable homes. This number is considerably below the 6,775 estimate of dwellings required to satisfy the housing requirements identified for the borough over the next five years ⁽¹²⁹⁾. Therefore a clear need for housing provision and for an increased element of affordable housing can be identified.
- 7.33** Table 7.1 shows actual and projected housing completions for the period 2002 to 2018 ⁽¹³⁰⁾. The annual average and the overall new housing completion rate in Lewisham has been lower than that required by the London Plan allocations 884 compared to a target of 975 (or 724 compared to 859 if only counting new dwellings) ⁽¹³¹⁾. However, completions over the Core Strategy period are expected to rise as a result of new land allocations for housing, particularly through the mixed use employment sites in Deptford and New Cross and the redevelopment of Convoys Wharf ⁽¹³²⁾.

127 Land Registry, 2008

128 Lewisham's Draft Housing Strategy 2009-2014

129 SHMA, 2008

130 LB Lewisham Planning Service 2008

131 This includes all newly built private sector properties, estate renewal, any conversions of existing dwellings into flats, any vacancies brought back into use, any newly created non-self contained dwellings and all newly built affordable housing

132 It should be noted that projected completions include vacant properties brought back into use and newly created non-self contained dwellings

Table 7.1 Actual and projected housing completions

| Actual completions | 02/03 | 03/04 | 04/05 | 05/06 | 06/07 | 07/08 | 03-08 Total | 08/13 | 13/18 |
|--------------------|------------|------------|------------|--------------|------------|--------------|--------------|--------------|---------------|
| New dwellings | 772 | 778 | 503 | 967 | 347 | 978 | 4,345 | 5,645 | 10,280 |
| Non-self contained | - | - | - | - | - | - | - | 225 | 225 |
| Vacant properties | - | 78 | 68 | 231 | 281 | 300 | 958 | 365 | 365 |
| TOTAL | 772 | 856 | 571 | 1,198 | 628 | 1,278 | 5,303 | 6,235 | 10,870 |

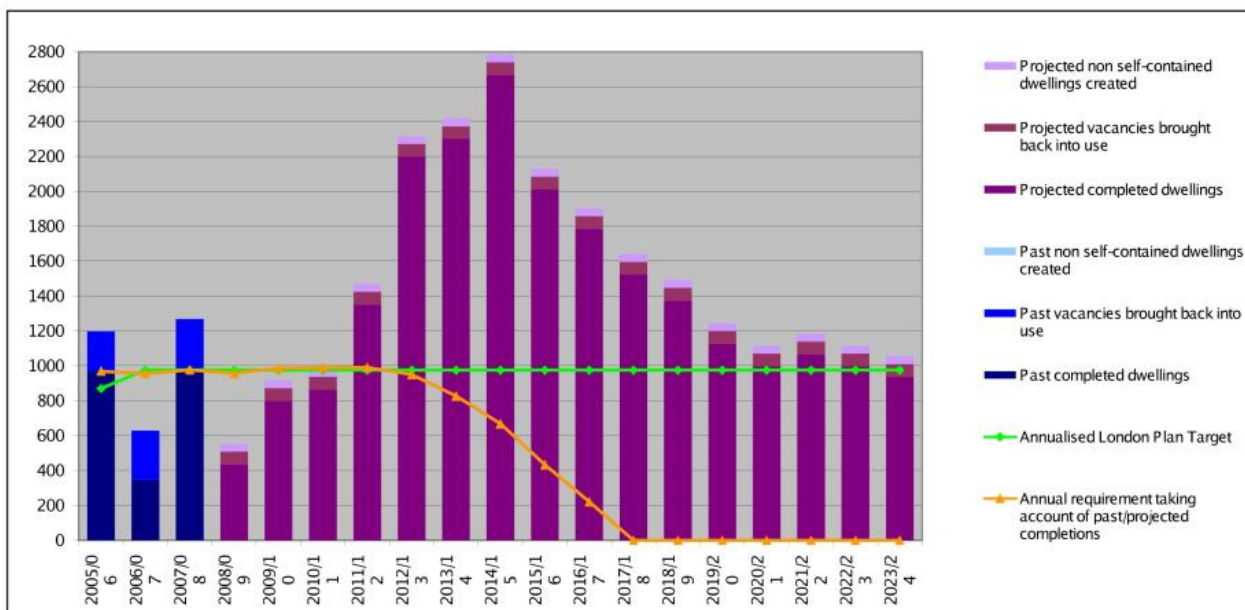
7.34 The 2007/08 monitoring year saw a sharp rise in the number of completions from all sources to 1,278 dwellings, up from 628 dwellings in 2006/07. This is accounted for by the completion of large schemes at Sundermead Estate (117), the former Hither Green Hospital site (109), Phase 3 of Pepys Estate (108), the former Downham Depot (103) and Clyde Terrace (57).

7.35 Based on the housing trajectory, the Council expects housing delivery to be below target for the next three monitoring years. However, it is expected that a strong supply of new housing will come on stream from 2011-12 onwards. The key reasons for this are that:

- The current economic slow down and 'credit crunch' is expected to slow housing delivery.
- Through the Core Strategy and the Site Allocations Development Plan Documents the Council will provide an up-to-date supply of development sites for housing (the DPDs are scheduled for approval from 2010 onwards).
- Estate renewal and development by Registered Social Landlords (RSLs) will continue with large schemes currently being built or planned for the Kender, Excalibur, Silwood and Heathside and Lethbridge estates.
- The approval of a number of schemes pre 2007-08 which are expected to be completed.
- A number of large schemes, which are currently in the pre-application phase are expected to come forward within the next three to seven years.

7.36 The result of the above is that over the next five to ten year period the borough will be able to meet and exceed its housing delivery targets, albeit it below target for 2008-09 to 2010-11 for conventional supply. This is shown in Figure 7.1.

Figure 7.1 Housing trajectory from the LB Lewisham Annual Monitoring Report 2007/08



7.37 The council has agreed a target of 429 affordable homes per year as a Local Area Agreement target. The Mayor of London has proposed⁽¹³³⁾ increasing this to 533 units per year. In the current economic climate achieving these targets will be challenging, particularly given that residential growth must be accompanied by infrastructure investment (health, transport, leisure, green spaces, and education) to ensure that we are creating places that are sustainable communities.

7.38 At this stage it is unknown how the economic downturn will impact the delivery of housing over the coming years. However, the impacts are expected to be a decline in housing delivery, particularly for the next three year period. This will be reviewed and reported as part of the 2008/09 AMR released in December 2009.

7.39 In terms of addressing the housing requirements of Lewisham's gypsy and traveller population, the council will need to review and consider the findings of the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment⁽¹³⁴⁾. This found a minimum additional pitch requirement for Lewisham of four and a maximum residential pitch requirement of 16.

7.1.1.3 Possible options

7.40 Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

133 November 2008

134 March 2008, Fordham Research for the GLA

Option 3

Housing provision

As shown through Spatial Options 1 and 2, the Council would seek to meet and exceed the London Plan housing target of an additional 9,750 dwellings, from all sources, over the period 2007/8 to 2016/17, equating to an annual target of 975 in accordance with London Plan Policy 3A.2.

For the period 2017/25 the Council will seek to meet and exceed the indicative capacity range of between 310 and 550 additional dwellings per annum, in accordance with Annex 10 of the London Plan.

The Council could meet this target through the following ways:

- the allocation of sites for housing development throughout the borough, to ensure at least a five year supply of housing land available for development, with an emphasis on sites within a growth corridor, specifically the Lewisham Town Centre, the Catford Town Centre and the Deptford New Cross area. This was discussed in Section 6.
- promoting mixed use development within town centres and on designated sites
- bringing back into use vacant dwellings
- providing non-self contained dwellings.

Option 4

Housing tenure

The option is to confirm that the provision of affordable housing will be given priority on all qualifying sites.

The option for the tenure of housing is to adopt the London Plan Policy 3A.9 of seeking as a starting point for negotiations a contribution of 50% affordable housing on qualifying sites across the borough. This would be subject to a financial viability assessment and the requirements outlined in London Plan Policy 3A.10.

The 50% contribution would be the Council's overall target for affordable housing and would equate to 4,295 dwellings between 2007/08 and 2016/17 ⁽¹³⁵⁾.

The Council would also support 100% affordable housing schemes.

The option for tenure and mixed and balanced communities is to adopt the London Plan Policy 3A.9 of 70% social rented and 30% intermediate provision.

135 This is 50% of the conventional supply (new dwellings) target of 859 dwellings per annum

Option 5

Affordable housing threshold

The option for the threshold of affordable housing is to apply London Plan Policy 3A.9 of seeking a contribution to affordable housing on sites capable of providing 10 or more dwellings.

Negotiations for affordable housing would also be sought on sites of 0.3 hectares or larger. This has been reduced by a third from the existing 0.5 hectares as the dwelling threshold has been reduced by a third.

'Cash in lieu' payment would not normally be accepted by the Council.

Option 6

Housing mix

The option for housing mix is to seek and promote a range of dwelling types and sizes, particularly family and affordable housing, in residential developments across the borough, based on the outcomes of the Lewisham Strategic Housing Market Assessment.

This would see the following preferred mix for intermediate and social housing as follows:

Table 7.2 Housing mix

| Housing requirement | Intermediate housing (%) | Social housing (%) 1 | Social housing (%) 2 |
|---------------------|--------------------------|-------------------------|-------------------------|
| 1 bedroom | - | 45 | 30 |
| 2 bedroom | 60 | 42 | 35 |
| 3 bedroom | 25 | 1 | 35 |
| 4 bedroom | 15 | 12 | |
| TOTAL | 100 | 100 | 100 |

1 - As recommended by the SHMA

2 - As recommended by Lewisham's Housing Strategy 2009-2014 (draft)

For market housing the Council proposes to seek an appropriate mix of dwellings within a scheme, having regard to the following criteria:

- the physical character of the site or building and its setting
- the previous or existing use of the site or building
- access to private gardens or communal garden areas for family units
- the likely effect on demand for car parking within the area
- the surrounding housing mix and density of population and
- the location of schools, shops, open space and other infrastructure requirements.

Option 7

Lifetime Homes

The option for Lifetime Homes is to apply the London Plan Policy 3A.5 and require all new housing to meet Lifetime Homes standards.

Option 8

Accessible housing

The option for wheelchair accessible housing is to apply the London Plan Policy 3A.9 and require 10% of all new dwellings to be wheelchair accessible or easily adapted for those using a wheelchair.

The option for special needs and specialist housing is to encourage provision subject to a proven local need in line with the recommendations of the Lewisham Strategic Housing Market Assessment.

Option 9

Gypsies and travellers

The option for gypsies and travellers is to ensure appropriate provision through a policy which makes every effort to identify a specific site or sites within the borough for their accommodation needs.

The Council is in the process of identifying a suitable site to meet the immediate need arising from the redevelopment of the Thurston Road site, which forms part of the approved Lewisham Gateway development.

Site suitability will be assessed against a criteria-based policy which would include the need to be sensitive to adjacent land uses, the viability of business and communities' quality of life, the potential impact of flooding, as well as the need for adequate infrastructure facilities and proximity to public transport.

7.1.1.4 Justification for the options

Consistency with national policy and guidance

- 7.41** The options support **PPS3**. A clear statutory framework exists for the quantity of new housing to be provided. PPS3 sets a strategic aim to increase provision. Paragraph 10 outlines the specific outcomes the planning system should deliver and includes the provision of a sufficient quantity of housing. This is reinforced in paragraph 32, which requires the level of housing provision to take into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders.

- 7.42** Further, paragraphs 20 and 22 promote mixed communities and a range of housing types based on the findings of the Strategic Housing Market Assessment. Paragraph 27 outlines the Government's commitment to providing high quality housing for people unable to access or afford market housing. Paragraph 29 states that Local Development Documents should set an overall target for the amount of affordable housing to be provided and identify the size and type of affordable housing based on the housing needs of the borough.
- 7.43** The options reflect the guidance contained in **Circular 01/06** (Planning for Gypsy and Traveller Caravan Sites). The Circular requires boroughs to consult with gypsies and travellers in order to ascertain their needs and intentions and to determine if site provision is adequate. This would include a gypsy and traveller accommodation assessment (paragraph 20). However, this is the responsibility of regional planning authorities and in London this means the Mayor of London. The Circular also states that the core strategy should set out criteria for the location of sites (paragraph 31).
- 7.44** The level of demand for sites within Lewisham and across London was assessed by Fordham Research on behalf of the Greater London Authority ⁽¹³⁶⁾. It is anticipated that the findings from this assessment will form part of a regional evidence base to be discussed with boroughs in due course to confirm pitch requirements.

Consistency with regional strategy and guidance

- 7.45** The options are consistent with the **London Plan**. Policy 3A.2 states that Development Plan Document policies should aim to exceed the figures in Table 3A.1. This should be done within the context of addressing the suitability of housing development in terms of location, type of development and impact on the locality, identify new sources of supply as well as a review of existing identified housing sites, and monitoring housing approvals and completions against both the targets set out in Policy 3A.1 and respective borough targets.
- 7.46** The options conform with London Plan Policy 3A.5 (Housing choice) in that Lewisham has taken steps to identify the full range of housing needs by offering a range of housing choices in terms of the mix of housing sizes and types. This encompasses Lifetime Homes and wheelchair accessible housing.
- 7.47** The London Plan also places a strong emphasis on the provision of affordable housing and adopts a strategic target that half (50%) of all additional housing should be affordable (Policy 3A.9). This is seen as strategically important in order to promote mixed and balanced communities and to meet the needs of households who cannot afford decent and appropriate housing in their borough.
- 7.48** The London Assembly Planning and Spatial Development Committee report entitled **Size matters: The need for more family homes in London** ⁽¹³⁷⁾ identifies a shortfall in the provision of family sized affordable housing. The option would ensure this form of housing is provided as part of any housing mix to meet local need.
- 7.49** The options support Policy 3A.13 (Special needs and specialist housing) of the London Plan, which seeks to ensure that special needs and specialist housing, including sheltered housing with care support staffed hostels and residential care homes, is provided in order to meet the housing needs of the community. This is reinforced in Policy 3A.13 (Loss of hostels, staff accommodation and shared accommodation) that the loss of such housing, and specifically

136 March 2008

137 June 2006

hostels, staff and shared accommodation, should be resisted if it meets an identified need, and the London Plan Housing SPG, where it is stated that housing provision should reflect the need for specialist and special needs.

- 7.50** The options are consistent with the London Plan Policy 3A.14 (London's travellers and gypsies). The Council should also protect existing sites, set out criteria for identifying new sites and identify when shortfall occurs. The preferred option also supports the London Plan Housing SPG in that the accommodation needs of gypsies and travellers will need to be assessed and provided for.
- 7.51** The options support the GLAs **London Boroughs' Gypsy and Traveller Accommodation Needs Assessment** in that the Council will assess and identify a site for the minimum number of required pitches and is proposing a criteria based policy to ensure site selection and assessment meet national and regional requirements.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.52** The options support the implementation of the **Sustainable Community Strategy (SCS)** and the priority to be clean, green and liveable - where people live in high quality housing and can care for and enjoy their local environment. The SCS seeks to increase the supply and quality of housing to accommodate the diverse needs of our population.
- 7.53** The options support the findings of the **Strategic Housing Market Assessment (SHMA)**. This was discussed earlier but shows housing need in the borough and a need for a mix in housing tenure and housing type and size.
- 7.54** The options support the **Lewisham Housing Strategy** (draft). This is focused on delivering enough of the right housing to meet local aspirations and need, but also on the wider goals of increasing opportunities for local residents, and the creation of vibrant, sustainable communities. The options support the strategy's four strategic priorities of increasing housing supply, widening housing choice, developing a quality rental sector, and expanding the housing offer.
- 7.55** The evidence from the SHMA model has been used to generate an option for housing mix (Option 6). This shows the proportion of family size dwellings of 3+ bedrooms needed in the intermediate sector is 40% and in the social rented sector 13%. However, work undertaken for the Council's draft Housing Strategy (consultation ended 15 January 2008) suggests that the need for family size dwellings in the social rented sector may be higher than that produced by the SHMA. The draft Housing Strategy recommends 35%. This figure is based on an analysis of overcrowding, Council lets of family units and social housing waiting lists.
- 7.56** Given the number of large affordable homes required in the borough, it will be important for the council to maximise the delivery of larger affordable housing. In this context it may be appropriate to adopt targets for 3+ bedroom affordable housing that are higher than that shown in the SHMA. This requires a policy decision to prioritise the provision of this housing over the delivery of some of the requirement for smaller homes also identified, but this could be justified in the context of delivery of affordable housing that enables families to remain in the area and provide long term sustainability for local communities.
- 7.57** The **Regeneration Strategy** seeks to create a liveable environment through the provision of decent homes.
- 7.58** The options can support the Lewisham **Children and Young People's Plan**, specifically Objective EW3, which seeks to ensure that young people aged 14–19 'live in a decent environment and home'.

What did the Sustainability Appraisal say?

- 7.59** The most sustainable option for housing provision would be the 'do nothing' option. The provision of additional housing has a negative impact on the environmental and social objectives due to the impact on natural resources and local services. However, this would not meet Government policy and guidance. Therefore, effective implementation would rely on appropriate mitigation measures which could include:
- ensuring a range of housing types are provided to meet need and the recommendations of the SHMA and the Lewisham's draft Housing Strategy
 - using sustainable construction methods and high quality design, including incorporating energy efficiency measures to address climate change issues
 - ensuring the recommendations of the Strategic Flood Risk Assessment are implemented and
 - providing additional social infrastructure to support new populations.
- 7.60** A key aspect for the housing options in environmental sustainability terms is the design and location of housing. These aspects are covered under section 6 (the Strategic Spatial Options for the borough) and sections 7.3.1 (Climate change) and 7.4.2 (Promoting good design). Housing design elements can be specified in accordance with the Code for Sustainable Homes. Level 3 is the minimum recommended, with aspirations for a range of housing such that code levels 4 to 6 can be reached. Mitigation against and adaptation for climate change are both affected by new housing proposals, and issues relating to adaptation against storm events, avoiding the exacerbation of run-off and coping with more extreme weather patterns are all relevant. Compliance with the recommendations of the SFRA would also go some way to address these issues.
- 7.61** The location of housing in terms of accessibility to public transport, services and employment opportunities are also relevant as is ensuring a positive encouragement of walking and cycling. Social inclusion should be an aspiration and recognised accordingly with quantitative targets. The SHMA and other assessments will provide important information to clarify this policy option.
- 7.62** The option for affordable housing is considered to contribute highly to social objectives yet ensures economic viability. Seeking an affordable housing contribution on all sites was most sustainable socially; however, there were negative economic impacts. Lower affordability targets ranked higher for the economic objectives.
- 7.63** Setting a broad mix for all housing (affordable and market) was considered most sustainable as it would apply to all forms of housing and had positive impacts for the widest range of indicators. However, ensuring a specific mix for affordable housing would ensure the overwhelming need for various types of housing can be met, as identified in the SHMA.
- 7.64** For gypsies and travellers, the option would have a positive impact on social inclusion. However, any criteria specified for the assessment of suitable sites need to ensure that the environmental and economic issues related to site assessment and occupation are adequately addressed.

7.1.1.5 Alternative options

- 7.65** An alternative option was to meet rather than exceed the London Plan target. The Lewisham SHMA supports maximising housing provision to support the overwhelming housing need, which can in part be achieved by the Council's desire to implement a bold regeneration

strategy encouraging mixed use development on key sites to improve the physical and social environment. This was outlined in Section 6. The London Plan also encourages boroughs to exceed targets. The Sustainability Appraisal also showed this option would have a limited impact on maximising social objectives. For these reasons the alternative option is not proposed to be carried forward.

- 7.66** Alternative options can seek to provide affordable housing on all sites or sites capable of providing 15 or more dwellings. These options are not proposed to be carried forward as lowering the threshold from 15 to 10 dwellings would maximise affordable housing provision and conform with the London Plan Policy 3A.11. Housing need as identified through the SHMA could also be compromised. The Sustainability Appraisal showed provision of affordable housing on all sites would not be economically viable.
- 7.67** For the affordable housing threshold, alternative options considered lower contributions to 20% or 35% or only requiring such provision on large sites. These options are not being carried forward as they would deliver less affordable housing than the regional target. Housing affordability is a critical issue and the SHMA shows there is overwhelming housing need. The Sustainability Appraisal also showed a lower threshold would not deliver sufficient affordable housing to meet community need.
- 7.68** For tenure and the creation of mixed and balanced communities, alternative options focus social housing in areas with a low representation of this form of housing, or decisions could be made on a case by case basis. Previous consultation responses were not supportive of these options. These options are not being carried forward as the Sustainability Appraisal and the SHMA have shown this would not meet housing need.
- 7.69** In setting a preferred housing mix for affordable and market housing, alternative options could have no housing mix policy or set a market housing mix. These options are not being carried forward as they would not contribute towards the objective of mixed and balanced communities. The Sustainability Appraisal has shown the options would not fulfil the housing need findings identified in the SHMA or contribute positively to social objectives. Consultation responses were not supportive of these alternatives. The Council could also choose to use housing mix as specified by the GLA in the Housing SPG. However, this would not meet housing need specifically identified for Lewisham and reported in the findings of its SHMA.
- 7.70** For gypsies and travellers, Government guidance outlines that the housing need of gypsies and travellers is an issue that should be considered when formulating planning policy as part of the LDF. It is considered that the only option to pursue in the Core Strategy is the identification of sites through criteria in line with Circular 01/06 and the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment ⁽¹³⁸⁾.

Question 22

Homes for all options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 23**Homes for all issues**

Are there any additional issues that need consideration?

Question 24**Homes for all options and alternatives**

Is there another feasible option or options having regard to the alternatives?

Question 25**Further comments**

Are there any other comments relating to housing?

7.1.1.6 Implementation and monitoring**How would the Council implement the options?**

- Preparing and implementing the following local development documents to identify sites suitable for housing provision:
 - A Development Plan Document for Site Allocations by 2011
 - Area Action Plans for the Lewisham and Catford Town Centres by 2011
 - A Supplementary Planning Document, prepared jointly with the London Borough of Greenwich, for the Deptford/Greenwich Riverside Opportunity Area by 2010
 - A Supplementary Planning Document on development contributions, including affordable housing by 2009
- Preparing an annual housing trajectory to show actual and projected completions and a Statement of Five Year Supply of Deliverable Land for Housing to show a continuous supply of housing land
- Facilitating the implementation of the Lewisham Housing Strategy to meet the wide range of identified and prioritised housing need
- Negotiating with developers on qualifying sites to ensure a proportion of affordable housing is secured through a planning obligation
- Allocating a site for the needs of gypsies and travellers to meet local needs in accordance with Circular 01/06 and the London Plan
- Working with key housing partners including:

- The Arms Length Management Organisation (ALMO) known as Lewisham Homes, and the Brockley Private Finance Initiative (PFI) to deliver affordable housing schemes and
- Registered Social Landlords
- Seeking to facilitate the implementation of the Lewisham Housing Strategy to increase affordable housing and deliver decent homes through the redevelopment of the following estates:
 - Honor Oak – £35 million in funding is being used to refurbish 798 properties and provide 127 new homes. Completion is scheduled for 2009.
 - Kender – over £70 million in funding will be invested in the area over five years. The scheme is scheduled for completion by 2010, by which time 594 homes will have been refurbished and 387 new homes built.
 - Silwood – 783 units will be demolished and replaced by 939 homes. The first phase of completed homes was handed over to tenants in September 2003. Completion is scheduled for 2011.
 - Heathside and Leathbridge – the demolition of 565 homes and their replacement with 1333 new homes, of which 35% will be affordable housing to be completed by 2015.
 - Excalibur Estate – London and Quadrant Housing will allocate £75 million for the demolition of 186 homes and their replacement by 460 new homes to be completed by 2015.

How would the Council monitor the options?

- The delivery of the strategic housing requirement of 975 per annum between 2006 and 2016 as reflected in the London Plan and any subsequent housing target set through the regional spatial strategy (NI 154 Net additional homes provided)
- The delivery of the strategic target of at least 50% of new dwellings on qualifying sites to be affordable housing (NI 155 Number of affordable homes delivered gross)
- The annual review of the housing trajectory and the Statement of Five Year Supply of Deliverable Land for Housing (NI 159 Supply of ready to develop housing sites)
- The number of new dwelling types by tenure and size
- The amount and location of special needs and specialist accommodation built
- The number of sites and pitches for gypsies and travellers
- The delivery of housing completed to Lifetime Homes standards
- The delivery of housing completed to wheelchair accessible standards or capable of easy conversion

Implementation and monitoring

Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.71** Risks for housing delivery will see the economic downturn impacting on the viability of housing development. However, any impact is considered to last for the short term (one to three years) rather than extend into the Core Strategy period. Sites may not come forward for housing development, although the preparation of a Site Allocations DPD would provide more certainty. The Council will also need to be proactive to ensure an appropriate site or sites come forward for gypsies and travellers.
- 7.72** There are risks related to the delivery of affordable housing. Planning applications could be approved with less than 50% affordable housing based on site specific evidence rather than overall borough need. The preparation of a Planning Obligations SPD will provide clear guidance on the application of affordable housing policies.

Signposts and evidence base**National**

- PPS3 Housing
- Circular 01/06 Planning for Gypsy and Traveller Caravan Sites

Regional

- London Plan, 2008
- London Plan SPG Housing, 2005
- Mayor's Draft Housing Strategy, 2007
- Size matters: The need for more family homes in London, London Assembly Planning and Spatial Development Committee, 2006
- Greater London Housing Requirements Study, GLA, 2004
- London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, 2008
- Best Practice Guidance, Wheelchair Accessible Housing, 2007

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Strategic Housing Market Assessment, 2008
- Strategic Land Availability Assessment, 2008
- Housing Investment Strategy
- Children and Young People's Plan

7.2 Grow local economy

7.73 This section deals with options that can address the issues relating to growing Lewisham's economy. This includes:

- Providing and safeguarding land for a range of employment uses and
- Providing and safeguarding land for retail uses and designating town centres.

7.2.1 Employment land

7.74 The Core Strategy policy options relate to implementing strategic objective 1 by contributing to regeneration and facilitating development and strategic objective 3 by growing the local economy to increase local employment opportunities.

Overview and summary of issues to be resolved

7.75 The improvement of the economy is a key issue for the borough. This Core Strategy issue deals with that part of the economy that needs sites and buildings occupied by offices, warehousing, factories and workshops. Land with these types of buildings is known as 'employment land' and in planning jargon is referred to as 'Business Use Class'. Retail and other town centre uses, and leisure uses, are dealt with elsewhere in this document.

7.76 Lewisham's approach to employment land will need to respond to:

- existing and predicted need for jobs
- forecast demand and predicted supply for new employment floorspace
- new and declining sectors of the economy and
- national and regional government policy.

7.77 There is a clear requirement that local planning authorities should use evidence to plan positively to meet current business needs and future changes. This means allocating land to meet strategic and local employment requirements. National policy through PPG4 (Industrial and Commercial Development and Small Firms) and Draft PPS 4 (Planning for Sustainable Economic Development) provides the key policy directions for employment land. There are also links to PPS3, which provides guidance on the use of land and advocates the reuse of vacant and derelict sites or industrial and commercial sites for housing. However, there is not a presumption in favour of housing over employment and no tests that sites have to pass in order to be safeguarded for employment use. This needs to be based on an employment land review to assess the supply and demand for employment land.

7.78 Of critical importance is the allocation of land as a Strategic Industrial Location (SIL). There is a need to maintain a core of land that provides for the strategic functioning of London including public utilities such as transport depots and bus garages, waste uses, logistics, uses that require 24 hour functioning, and services to the City. The London Plan states that Strategic Industrial Locations represent London's strategic reservoir of industrial capacity and that the appropriateness of the boundaries should be kept under review by boroughs. Surplus employment land should help to meet strategic and local requirements for other uses such as education and community activities and in particular housing.

7.79 In respect of Local Employment Locations the Council should have regard to sustainability criteria, accessibility to the public, location in relation to the road network and other sustainable forms of transport, site quality and efficient use.

7.80 Lewisham has two Strategic Industrial Locations (SILs). Sites at Surrey Canal Road form the Surrey Canal Strategic Industrial Location. It is the largest remaining industrial area in the borough. The borough's major waste transfer and processing sites are located here, including the Council's civic recycling site, a combined heat and power station and other waste transfer facilities, as well as warehousing and industry based around a relatively large concentration of purpose built industrial units and warehousing. There is the potential for concentrating more waste uses at this location. The Bromley Road SIL provides a significant reservoir of land for transport, utilities, warehousing and other businesses in the south of the borough.

7.81 The Core Strategy needs to:

- determine the type of employment land that should be retained and whether what is provided is well located and offers buildings that are flexible enough to meet the demands of growing employment sectors, including creative industries, and the forecast growth in jobs
- ensure the managed release of industrial land according to regional benchmarks
- designate and manage Strategic Industrial Locations that offer sites that contribute to the continued industrial functioning of London as a whole
- designate a network of smaller employment sites of more local significance in order to provide variety and flexibility to the local economy
- within the context of the above plan to accommodate and support existing economic sectors and new or emerging sectors or clusters
- avoid carrying over existing allocations from current plans: if there is no reasonable prospect of a site being carried forward for economic development during the plan period, it should be actively considered for other uses.

7.82 The Core Strategy policy areas proposed to be covered include:

- providing for economic growth
- providing and safeguarding strategic and local employment land
- providing for new and growing business and industrial sectors
- clustering of creative industries.

7.2.1.1 Previous consultation responses

Summary of the Issues and Options consultation

7.83 Consultation responses received were in favour of retaining core industrial locations. The Greater London Authority stated that release of sites from these locations should be justified on the basis of robust demand studies. Other comments on these locations were:

- Adjustments to their boundaries might be necessary as circumstances change but the overall amount of land should not be diminished.
- The boundaries of these locations should remain unchanged.
- Some sites may have outlived their usefulness and would be better used for other purposes.
- Small and medium enterprises and the creative sector should be protected.

- 7.84** In the case of Local Employment Locations there was a negative response to a general question as to whether all the current defined employment areas should be retained in employment use, and in favour of judging whether or not the sites should be released by the use of criteria based policies.
- 7.85** The focus of consultation at this stage was on the uses of particular sites, asking the question whether they should continue in their current employment use, and seeking suggestions for new future uses including residential and mixed use with employment.
- 7.86** Responses largely related to suggestions for the retention and/or release of these sites. The Oxestalls Road Employment Area received the largest number of comments and suggestions relating to residents' concerns about the activities of a car breaker on the site. Developers and landowners registered interest in redeveloping various sites in the north of the borough including sites at Surrey Canal Road, Oxestalls Road, Plough Way, Creekside and Arklow Road and Childers Street.

Summary of the Preferred Options consultation

- 7.87** Concern was expressed by two large community organisations located in the proposed major growth corridor that the impact of the growth proposed by the Preferred Option for the development of a number of Mixed Use Employment Locations was unsustainable in terms of the capacity of the local transport network and community infrastructure. Some comments from community groups were in favour of retaining some of the employment land at Oxestalls Road in its current industrial use. They also questioned why the major growth proposed by the Preferred Option was confined to a relatively narrow corridor of the borough and thought that growth should be spread more evenly.
- 7.88** Other comments from community groups questioned whether employment land should be retained due to the largely suburban character of the south of the borough. Other comments were that the new employment proposed for the Deptford/New Cross area should be ambitious both in terms of numbers of jobs and their quality. New business should provide employment for the next generation and offer a range of job opportunities for all people with all levels of qualification. Concerns were expressed that the upgrading of the businesses at Mixed Use Employment Locations might actually reduce job opportunities for deprived communities.
- 7.89** The Greater London Authority stated that the redevelopment of these locations should be based on appropriate assessments of supply and demand as part of a formal Employment Land Review. Brixton plc, the owners of one of the sites in the Surrey Canal SIL, also considered that release of land should be in the context of an Employment Land Review. St. James Homes considered that the SIL should allow for housing development. Other suggested uses were 'cash and carry developments' (a sui generis use) and operational police uses.
- 7.90** British Telecom requested that the BT depot site at the Bromley Road SIL should be redeveloped for housing as it was no longer suitable for commercial development.
- 7.91** Comments were made by various landowners at the Creekside Local Employment Location that this site should be redeveloped with Mixed Use development including housing.
- 7.92** There was support from a number of developers for the Mixed Use Employment Policy. The GLA and Brixton plc considered that this should be done in the context of an Employment Land Review.

7.93 Question marks were raised over the redevelopment proposals for Convoys Wharf, in particular by the Port of London Authority, which stated that the proposals for this site were incompatible with its Protected Wharf status.

7.2.1.2 What does the evidence say?

7.94 The most deprived areas of the borough are concentrated around the borough's main employment areas. The Evelyn and New Cross wards have the highest deprivation scores as shown in the Index of Deprivation 2007.

7.95 Evidence from the Lewisham Economic Development Business Plan ⁽¹³⁹⁾ found the borough lost nearly a third of its already fragile industrial base between 2000 and 2004. Commercial and industrial stock shrunk by 8.7% between 1985 and 2003. The Lewisham Employment Land Study (ELS) ⁽¹⁴⁰⁾ showed that the borough has a small economy in relation to most boroughs in London. Most businesses in Lewisham are small, employing less than 10 people ⁽¹⁴¹⁾. Further details from the ELS are set out below.

7.96 The ELS notes that growth in demand for commercial floorspace is mostly locally generated, the dominant occupier type being small, owner managed businesses providing goods and services to local demand such as building supplies, motor parts and repairs, although many of these businesses probably find markets among the supply chains of larger central and wider London businesses ⁽¹⁴²⁾.

7.97 The ELS also notes that much of the 'industrial' space in Lewisham is occupied by businesses providing goods and services to other businesses in central London, e.g. design, courier services, catering, cleaning, security shop fitting that would not normally be described as traditionally 'industrial'. These modern suppliers of goods and services require accessible, economic and simply specified premises from which to service their customers ⁽¹⁴³⁾.

7.98 The area of land designated for employment is small in relation to the size of the borough as a whole, which leads to a shortage of provision in some areas, particularly larger good quality buildings. Local firms that grow generally need to move outside the borough. Therefore there is a mismatch in the types of premises available in the local market and the demands of local businesses. Estates of smaller modern units are generally well occupied, leading to a 'tight' local market, but vacancy rates for the borough as a whole are relatively high ⁽¹⁴⁴⁾.

7.99 Along with the rest of London the economy has undergone extensive restructuring in recent years with the decline of manufacturing. Much of Lewisham's industrial stock is in older buildings that are deteriorating and in need of investment to ensure that businesses will want to continue to occupy and invest in them. Some sites are under used, provide a poor environment for businesses, and have limited potential for redevelopment for solely business uses ⁽¹⁴⁵⁾.

7.100 Despite the promotion of Lewisham and Catford Major town centres as locations for major office development, over several years the borough has not succeeded in becoming an attractive location for office development although a significant amount of B Use Class space is proposed at Lewisham Gateway and at Convoys Wharf. In terms of accommodating future

139 2004

140 2008

141 ELS para. 3.31

142 ELS paragraphs 4.42 and Chapter 8

143 ELS paragraphs 4.38 and 4.48

144 ELS paragraphs 4.17 to 4.19

145 ELS Chapters 7 and 8

employment growth, the GLA forecasts expect significant growth in Lewisham in office employment, which grows by more than half to 2026. This is very different from the past, where there has been very little employment growth, and very small shifts towards office employment. There are plans for more housing and therefore new people moving to Lewisham who may bring new skills and better match the office based sectors ⁽¹⁴⁶⁾.

- 7.101** 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. Business services and food manufacturing and services are also identified as having significant growth potential ⁽¹⁴⁷⁾.
- 7.102** Lewisham is classified in the Greater London Authority's Industrial Capacity SPG 2008 as a borough where there should be a 'limited transfer' of industrial land to other uses; boroughs are 'encouraged to manage and where possible, reconfigure their portfolios of industrial land, safeguarding the best quality sites and phasing release to reduce vacancy rates for land and premises'. However, the borough is scheduled to release more land than any other borough in the South East London sub-region, including Bexley, which is classified as 'Managed' release. Lewisham should lose 49 ha of industrial land over the period 2006 to 2026, which is 54% of its total. If all the land designated as Strategic Industrial Locations was retained, that would imply the loss of 78% of the borough's remaining stock of industrial land.
- 7.103** Between 2006 and 2026, Lewisham's total employment numbers is forecast to grow by 16,950 jobs or 847 jobs per year. This is a 21% increase over the plan period, which is in line with the London average of 20%. The bulk of this growth is accounted for in non-business class sectors, which grow by 465 jobs per year, closely followed by office employment, gaining approximately 400 jobs per year. Industrial and warehousing change is insignificant by comparison. Office jobs are forecast to grow by 52% compared to a regional average of 41%, while industrial jobs fall 5% which is below the London average of 8% ⁽¹⁴⁸⁾. The forecast demand for business (employment) floorspace based on these projections is for a net increase of some 132,500 m² of office space i.e. 6,600m² in office space per year, and a net fall of 15,500 m² in industrial space i.e. 770 m² per annum. Demand for 117,000 m² or 5,850m² per annum of net additional business space is projected for the period 2006 to 2026 ⁽¹⁴⁹⁾.

7.2.1.3 Possible options

- 7.104** Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

146 ELS paragraphs 8.13 - 8.14

147 ELS paragraph 4.55

148 Chapter 5 ELS

149 Chapter 6 ELS

Option 10

Strategic Industrial Locations

The recommended option for the Strategic Industrial Locations ⁽¹⁵⁰⁾ is to retain areas of land at Surrey Canal Road and Bromley Road appropriate to contribute to the continuing industrial functioning of London. This land is considered suitable and adequate to support roles which are important to the wider economy for public utilities, waste management and recycling, logistics, and transport related activities. Parts of the Surrey Canal Area offer the potential for 24 hour functioning. The uses in these areas will also offer training opportunities for local people.

The boundaries for the locations are shown on figures 7.2 and 7.3. This involves consolidation of the SIL at Surrey Canal Road and the release of sites on the periphery for Mixed Use development.

This option for Surrey Canal Road SIL involves the retention of 27.61 ha of land within this designation. This includes the addition of two sites at Silwood Triangle (3.94 ha) and waste sites at Mercury Way (0.9 ha), which were not previously designated as SIL. Silwood Triangle was identified in the Employment Land Study as having the potential to host light industrial uses once the programme of works for the East London Line extension has been completed. The sites at Mercury Way are established waste transfer uses which are protected for these uses by the London Plan and therefore suitable for designation as SIL. The option involves the Mixed Use redesignation of SIL land amounting to 15.85 ha.

The preferred option for the Bromley Road SIL (8.28 ha) does not involve consolidation or release of sites for redevelopment.

150 SILs in the London Plan are categorised into Industrial Business Parks for companies needing a relatively good quality environment and Preferred Industrial Locations to meet the needs of firm with less demanding environmental requirements. Both Surrey Canal and Bromley Road are Preferred Industrial Locations

Figure 7.2 Surrey Canal Road Strategic Industrial Location

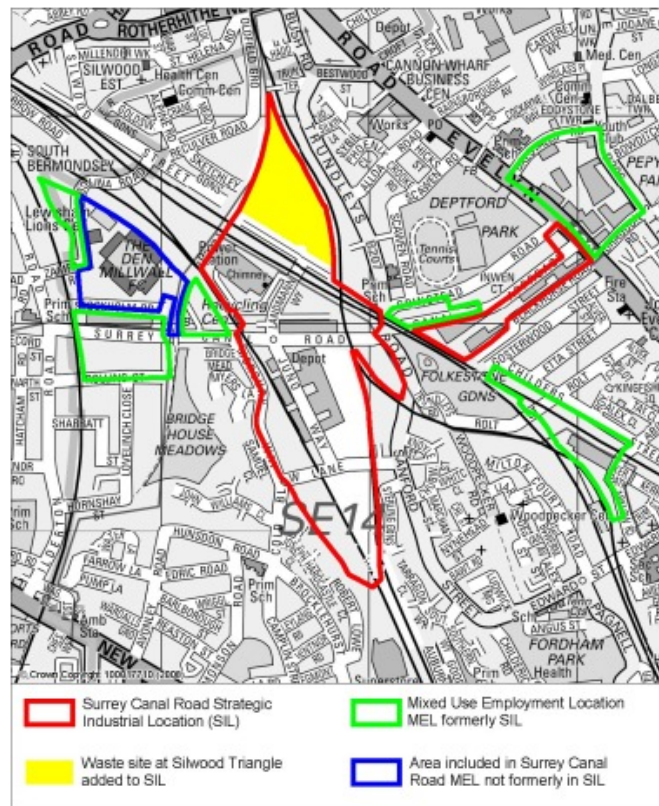
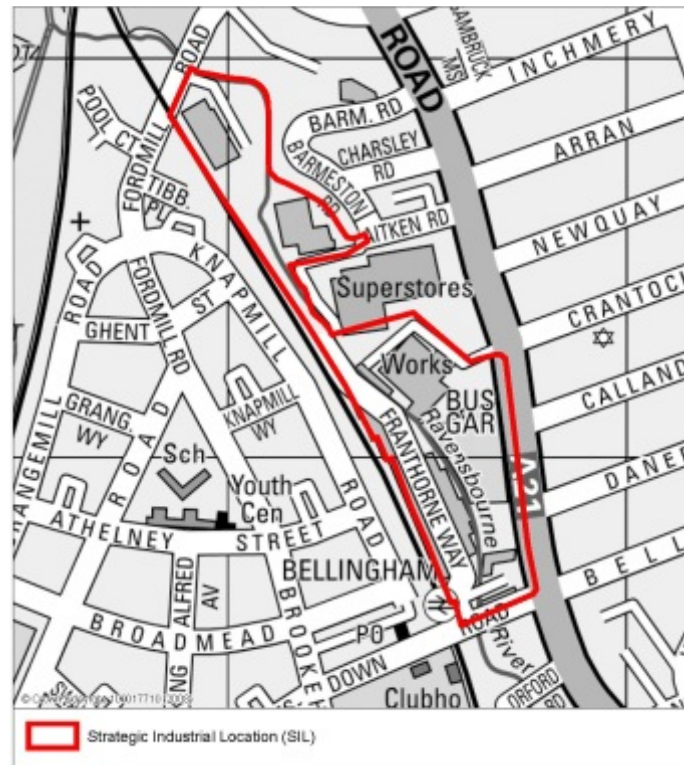


Figure 7.3 Bromley Road Strategic Industrial Location



Option 11

Locally significant employment areas

The recommended option for more locally significant employment locations is to designate a series of smaller areas borough-wide to meet the identified need for modern business and small warehousing and workshop units and also buildings suitable for occupation by the creative industries. These areas also present the possible training opportunities for local people. These areas are shown on Figure 7.4 and listed below:

Evelyn Street (1.19 ha); Creekside (3.12 ha); Blackheath Hill (0.32 ha); Manor Lane (2.75 ha); Lewisham Way (0.50 ha); Endwell Road (1.36 ha); Malham Road (3.63 ha); Willow Way (0.86 ha); Clyde Vale/Perry Vale (0.9 ha); Worsley Bridge Road (1.20 ha); Stanton Square (0.97 ha); Molesworth Street (1.38 ha).

The Lewisham Employment Land Review identified a small creative industry sector in the borough that is growing rapidly⁽¹⁵¹⁾. The Creekside Local Employment Location has been identified as a centre for these industries.

Option 12

New and growing business and industrial sectors

The recommended option to balance the needs of housing and to cater for the needs of industrial and business sectors for which a demand has been identified is to designate a series of Mixed Use Employment Locations shown on Figure 7.4. These will also provide an increased and varied range of job and training opportunities.

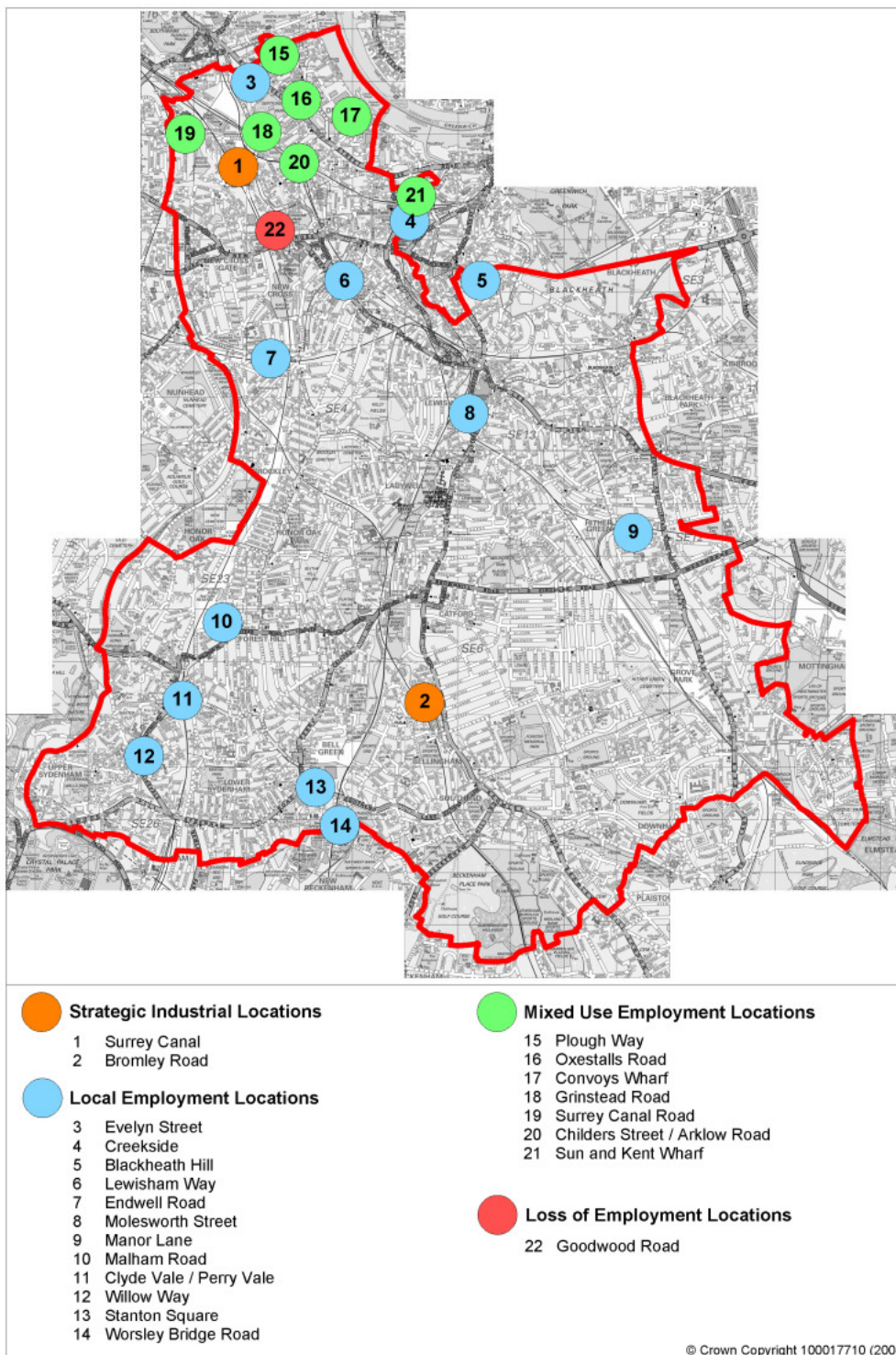
This option is based on evidence from the Lewisham Employment Land Study⁽¹⁵²⁾ which allows for the phased release over the lifetime of the Core Strategy of a number of sites amounting to 15.85 ha. on the periphery of the Surrey Canal SIL and one Local Employment Location at Plough Way amounting to 8.22 ha. Sun Wharf and Kent Wharf (1.4 ha) will also be designated as a Mixed Use Employment Location, but this site was already designated as a Mixed Use site and does not involve release of designated industrial land.

The Employment Land Study has identified that Lewisham is in a strong position to take advantage of its location close to central London to supply space for businesses offering goods and services to other central London businesses. These suppliers of goods and services require accessible and economical premises with a reasonable quality and environment. These uses may include: buildings services, catering, cleaning firms, courier services, design firms, distribution, furniture and joinery, hospitality, IT support services, mail management, marketing services, media production, office supplies, plumbing supplies, printing, property management, removals and storage, security firms, shop fitting, training and vending supplies. Growth sectors have been identified in business services, food and the creative industries.

151 ELS paragraphs 3.16 to 3.18

152 2008

Figure 7.4 Designated employment areas



Option 13

Convoys Wharf

The recommended option for Convoys Wharf (16.96 ha) is for the outline planning permission the Council resolved to grant in 2005 for a comprehensive Mixed Use development for the following uses:

- 3,500 residential dwellings
- 70,000 square metres of B1, B2, B8 employment space with around 50% of this space allocated for B2 wharf activities
- 15,000 square metres of other space suitable for cultural/community/retail/restaurant and leisure uses.

The development will deliver a significant amount of B Class employment space and respond positively to the policy requirements to reuse the protected wharf on this site.

Option 14

Other employment locations

The recommended option for the scattering of employment locations is to apply a criteria based policy founded on the location and adjacent land uses, quality, and demand for premises. Those sites in town centres and/or having the potential to contribute to a centre of gravity or cluster of commercial and business uses should be recommended for retention in employment use.

7.2.1.4 Justification for the options

Consistency with national policy and guidance

- 7.105** The options presented support the aims of **PPG4 (Industrial and Commercial Development and Small Firms)**. They provide choice, flexibility and competition and there will be sufficient land available which is readily capable of development and well served by infrastructure.
- 7.106** The options also support the aims of **Draft PPS 4: Planning for Sustainable Economic Development (December 2007)** by proactively planning for economic growth. The Employment Land Study allows Lewisham to positively meet current business needs and future changes, particularly by accommodating and supporting existing economic sectors, and new or emerging sectors.
- 7.107** The options support **PPS3 (Housing)** where employment land is mentioned. PPS3 notes in paragraph 38 that: 'Options for accommodating new housing growth...:may include, for example, re-use of vacant and derelict sites or industrial and commercial sites for providing housing as part of mixed-use town centre development.'

Consistency with regional strategy and guidance

- 7.108** The options support the **London Plan**. Policy 3B.1 (Developing London's economy) supports the provision of a range of workspaces of different types, sizes and costs to meet the needs of different sectors of the economy. Policy 3B.3 (Mixed Use Development) supports the provision of mixed use development and redevelopment to support consolidation and selective rejuvenation of office provision.
- 7.109** Policy 2A.10 (Strategic Industrial Locations) and Policy 3B.4 (Industrial Locations) require boroughs to identify and seek to protect Strategic Industrial Locations (SILs) and other locally significant industrial areas. The SIL areas are intended to accommodate London's reservoir of industrial capacity and relate to businesses that do not demand a high quality environment

and which contribute to meeting London's economic infrastructure needs in sustainable locations. The SILs are divided into either Preferred Industrial Locations or Industrial Business Parks.

- 7.110** The text to Policy 2A.10 states that 'taking into account trends in the wide range of industrial type activities and scope for more efficient use of industrial capacity, as well as more specific new requirements for waste management and recycling...there is scope for an average annual net release of 41 ha. 2006-2026, mainly in parts of north east and south east London'. Annex 2 of the London Plan identifies two Preferred Industrial Locations in Lewisham in the Surrey Canal area and along the Bromley Road. The Lewisham Employment Land Study has considered the boundaries of SILs in Lewisham and made recommendations.
- 7.111** The London Plan (Policy 3B.4) states that DPDs should set out policies in respect of Local Employment Locations that have regard to the London Plan and SPG and sustainability criteria including accessibility to the public, location in relation to the road network and other sustainable forms of transport, site quality and efficient use. The options include defining locally important employment areas.
- 7.112** Policy 3B.8 (Creative Industries) refers to the identification and support for the development of clusters of creative industries and the protection of existing clusters. Deptford Creekside is identified as a smaller or emerging cluster. Policy 3B.10 (Environmental Industries) supports the establishment of green industries and green practices in business, and policies should identify and safeguard land and premises as appropriate and facilities for recycling and reprocessing of waste. The options aim to promote creative clusters, particularly in the Deptford area, and identify waste sites to be safeguarded from change of use or redevelopment.
- 7.113** Policies 4C.8 (Freight Uses on the Blue Ribbon Network) and 4C.9 (Safeguarded Wharves on the Blue Ribbon Network) set out to increase the use of the network for transport freight and general goods, and to protect safeguarded wharves for cargo-handling uses and the transport of waste. Convoys Wharf in Lewisham is a safeguarded wharf and is identified as an important strategic site. Adjacent development should be designed to minimise the potential for conflicts of use and disturbance. Wharfs should be redeveloped for other uses if it is accepted it is they are no longer viable for cargo handling according to criteria set out in the Plan.
- 7.114** The **Industrial Capacity Supplementary Planning Guidance** (March 2008) provides guidance on the interpretation and implementation of London Plan policies. Policy SPG 1 outlines a 'plan, monitor and manage' approach to the maintenance and release of industrial land. The SPG proposes a number of economic, land use and demand based criteria for considering the release of sites in industrial use.
- 7.115** Paragraph 8.3 states that mixed-use intensification should only be considered where it supports the Plan's broader objective to encourage better use of land. Para 8.6 states that in the context of the strategic London-wide study (referred to in the SPG) local assessments of industrial land demand and supply should identify surplus industrial land after taking into account the need to accommodate logistics, waste management, utilities and transport functions. The Lewisham Employment Land Study 2008 does this. In drafting policies and site specific proposals in Development Plan Documents, boroughs are encouraged to consider the potential for surplus industrial land to provide a mix of other uses such as housing and, where appropriate, to provide social infrastructure and contribute to town centre renewal. The options put forward mixed use redevelopment areas.

7.116 The suggested approach supports the **London Industrial Land Release Benchmarks 2007**. According to this report the total of built on industrial land in Lewisham fell from 106 ha in 2001 to 90 ha in 2006, a fall of 15%. The London Industrial Land Release Benchmarks states that Lewisham should lose 49 ha of industrial land over the period 2006 to 2026, 54% of its total. Or if the indicative SIL were to be protected then this would imply losing about 78% of the borough's remaining stock of industrial land which would result in a restriction in the choices for local businesses in finding suitable land or premises, and potentially longer journeys to work for Lewisham residents⁽¹⁵³⁾. This issue is addressed in the Lewisham Employment Land Study (ELS) 2008 and is reflected in the options for mixed use development. The ELS also examines three scenarios for the provision of floorspace in terms of the 'committed supply' (i.e. mostly existing planning permissions) and projected floorspace arising from the development of the Mixed Use Employment Locations in the context of the GLA Employment Forecasts for 2006 to 2026⁽¹⁵⁴⁾. The suggested options support the GLA Employment Forecasts.

Consistency with the Sustainable Community Strategy and other Council documents

7.117 The preferred option supports the implementation of the **Sustainable Community Strategy (SCS)**, which proposes to improve access to the number, quality and range of employment opportunities, by:

- promoting local economic growth, business clusters and mixed use developments and facilitating the expansion of businesses through the planning process and
- increasing the overall number of jobs in the borough and maximising the local benefits from development and regeneration opportunities, such as the East London Line depot in New Cross.

7.118 The options support the **Regeneration Strategy 2008-2020**. One of Lewisham's corporate priorities is to strengthen the local economy by gaining resources to regenerate key localities, strengthen employment skills and promote public transport. The Strategy states that Lewisham has a cluster of national and internationally recognised educational assets including Goldsmiths College, the Laban Centre, Trinity College and the Horniman Museum. Many artists and designers stay on in Lewisham, resulting in a thriving cultural industries sector within the local economy.

7.119 The options support the **Lewisham Economic Development Business Plan (2004)**. This was prepared by the Council in 2004 by Ancer Spa. It points out that 'many industrial areas are occupied by low grade businesses with fragmented occupancy and uses' and states that to make the best use of employment sites a proactive approach is required.

7.120 The plan also states that there is a need for particular types of space – an environmental industries cluster which could be provided at Surrey Canal Road, space for creative industries which could be provided in a range of locations across the borough and small business space. The plan identifies a general shortage of small business space and states that: 'There is a need to examine the potential of the traditional employment areas and the town centres to accommodate more of this type of development.'

7.121 The options support the findings of **The State of the Borough June 2004 by the Local Futures Group**, which identified that Lewisham's economy, although good in the national context was weaker in the regional and sub-regional context. It found that Lewisham's industrial structure was 'modest' in scale and rate of economic growth.

153 Para. 5.5 ELS

154 Chapters 5 and 6 ELS

7.122 The options support the **Lewisham Local Cultural Strategy** (2002). The Strategy states that Lewisham has a significant advantage in a world-class grouping of higher and further education institutions which is a unique asset that distinguishes it from other boroughs. These act as a pull factor for the cultural and creative industries. A nucleus of industries has developed particularly in Deptford. The aim of the Strategy with respect to the local economy is ‘to develop and strengthen a sustainable economy for Lewisham through the support and encouragement of the cultural and creative sectors’.

What did the Sustainability Appraisal say?

- 7.123** The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the need to support the requirements of the London and local economy by the provision of appropriate sites. The options have negative effects recorded against social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives reflecting that industrial sites situated locally should have an effect in reducing traffic movements. London will not be able to function without a certain amount of land given over to waste management and warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected.
- 7.124** Many of the negative environmental effects could be mitigated by various measures, such as the use of green roofs, living walls, sustainable urban drainage techniques, and energy efficient buildings. However, it is not expected that the sites within the Strategic Industrial Location proposed to be retained will be redeveloped to higher building and landscaping standards, so opportunities for this sort of improvement will probably be rather limited. This will mean that the appropriate location of these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere within the borough to meet targets.
- 7.125** The option to promote Mixed Use Employment Locations scores positively against a wide range of economic, social and environmental objectives. The main negative effects recorded are in relation to waste generation, use of water resources, air quality and traffic movements all associated with the fact that development at a higher density will inevitably have environmental impacts. These can be mitigated by various environmental measures which are likely to be implemented in any redevelopment arising from this policy.
- 7.126** If mixed use development does not occur for reasons outside the control of the Core Strategy, then it is likely that the social and environmental objectives of the suggested approach will not be achieved. There may also be significant cumulative impacts if a large number of sites are redeveloped in the north of the borough in terms of the pressure put on local physical and social infrastructure. It will clearly be vital to ensure that these elements are included in the mix of uses and that adequate transport facilities and connections are provided.
- 7.127** Effects recorded with respect to the numerous small employment sites in the borough were relatively minor. The cumulative effect if a large number of these sites were to change use was not specially considered, as the redevelopment of these sites is usually sporadic and difficult to predict. The option seeking to protect small employment sites scores positively over a wide range of environmental and social indicators, and well on the economic indicators. Negative effects are recorded when retention of these sites in economic use would mean that housing or other community uses would not be developed. These sites are also physically very varied and the effects on the environment and townscape will vary from site to site.

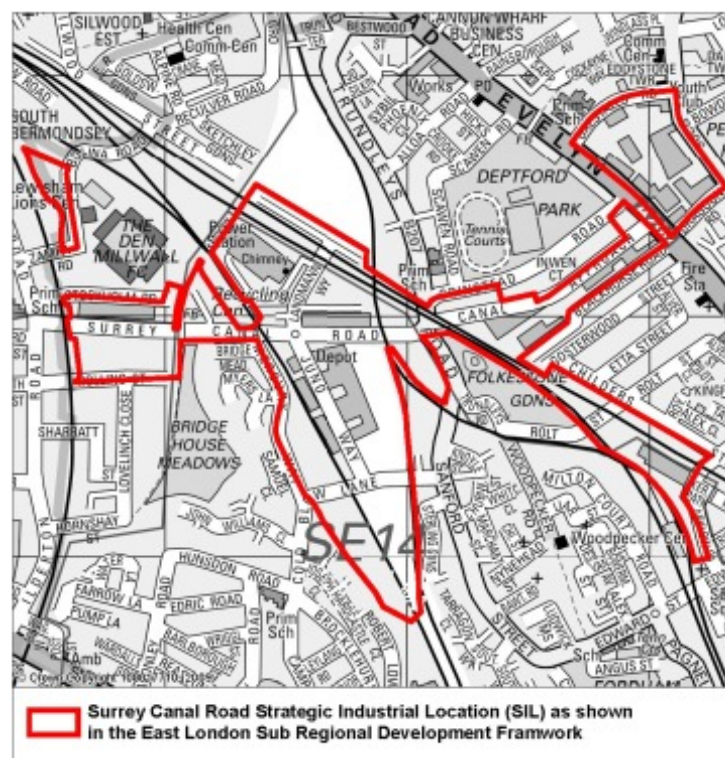
7.128 The major benefits arising from the aim to protect and support creative industry clusters are in relation to economic growth as a means of making the local economy more varied and more attractive to further investment, also indirectly to townscapes by increasing the variety and quality of business activities. Benefits to employment were considered to be potentially fewer due to the varied nature of the sector and a large number of single person businesses. The benefits of this policy can be maximised by ensuring that local people can gain access to whatever employment and training opportunities become available. The benefits of this option might be neutral if, as a result of the upgrading in the local economy and environment, premises become more expensive and these uses move on to areas where cheaper premises are still available. This possibility could be reduced by putting planning agreements or management arrangements in place to ensure these uses are able to continue.

7.2.1.5 Alternative options

Strategic Industrial Locations Surrey Canal Road

7.129 An alternative option is to retain the current boundaries of the Strategic Industrial Location (SIL) at Surrey Canal Road as shown in the London Plan's East London Sub-Regional Development Framework ⁽¹⁵⁵⁾. The boundaries are shown on Figure 7.5.

Figure 7.5 Surrey Canal Road SIL as identified by the East London Sub-Regional Development Framework



7.130 This option is not being carried forward for the following reasons:

- The evidence in the Employment Land Study 2008 indicates that the Council can meet the requirements for SIL from the area of land described in Option 10 as some of the sites at the location are not making a significant contribution to the strategic and local

economy, and that this would allow for some release of industrial land in accordance with the GLAs Industrial Land Release Benchmarks ⁽¹⁵⁶⁾.

- The area has lacked investment over several years. Protection of this employment land for industrial uses has not resulted in any intensification of uses on these sites or upgrading of premises. Although this SIL is defined as a Primary Industrial Location in the London Plan, where firms have less demanding requirements for quality of premises the overall quality and lack of investment in the buildings has started to bring into question the continued viability of the location, particularly on sites on the periphery of the SIL ⁽¹⁵⁷⁾.
- The Lewisham Employment Land Study 2008 has identified an unmet demand for premises to suit local SMEs whose requirements are intermediate between office and the lower environmental quality of those premises in the SIL, which could be provided on Mixed Use Employment sites released from the periphery of the SIL ⁽¹⁵⁸⁾.
- The Mixed Use redevelopment (including housing) of some of these sites on the periphery of the location could provide new employment in small business units and other types of uses that could boost the local economy and provide regeneration benefits, improving the image of the location as a whole as a place for business, thereby increasing its strategic contribution to London as a whole.
- Conversely, the recent development of the East London Line Depot at the southern end of the SIL on former railway lands consolidates the uses at the SIL and will provide new employment and strengthen its core functions in supporting the functioning of London as a whole by providing new transport infrastructure, and an increase in employment opportunities.

7.131 Alternative options for land use considered developing some of the sites at the SIL for 100% housing and various proportions of affordable housing, including requiring 100% affordable housing. Suggestions for other uses for some of the sites were also requested as part of the consultation. The alternative options suggesting redevelopment of parts of the SIL for 100% housing have not been carried forward for the following reasons:

- Although the development of these sites for housing and affordable housing would contribute to meeting (and exceeding) the targets for provision of housing, it is not considered to meet the other policy requirements of the London Plan to support the continued economic functioning of London.
- It would involve the loss of a considerable amount of employment land in a borough which, as stated previously, does not have large amounts of land dedicated to offices, workshops and factories and warehousing, without replacing any commercial uses, and buildings for these uses for which there is an identified demand.
- The Surrey Canal SIL is situated in an area of the borough which lacks identified centres and local facilities. In places it suffers from a degraded environment and a dislocated street network crossed by railway lines and viaducts. As a result, it is considered that the opportunity should be taken to increase the variety of uses in the area and provide for more local facilities as well as housing and therefore regenerate the area.

156 Chapters 5, 6, 7 and 8 Lewisham ELS

157 Chapters 7 and 8 Lewisham ELS

158 Chapter 4 ELS

Strategic Industrial Locations Bromley Road

7.132 Alternative options at the Issues and Options stage for the redevelopment of this employment location for other uses, including mixed-use development and housing, are not being carried forward for the following reasons:

- The ELS considered that the Bromley Road SIL represented a vital reservoir of employment land in the south of the borough and that in size terms alone it was of strategic importance and should be seen as such in policy terms ⁽¹⁵⁹⁾.
- The area provides a focus for economic activity in a part of the borough that is relatively under-served with such land.
- The area has advantages such as access, local shops and services and profile.
- The Council is meeting its housing targets without the need to develop parts of this location for housing

Convoys Wharf

7.133 Alternative options for Convoys Wharf were not presented at the Issues and Options stage, as at the time the Council considered that the project represented by the deemed outline planning permission in 2005 described in the recommended option would proceed past its final stages of approval by the Mayor of London. However, considerable delays have occurred since then, and it is possible that other schemes will be proposed for this large site in the north of the borough involving the use of a higher proportion or all of the protected wharf area as a wharf (approximately half of the 16.96 ha site), leaving a reduced site area available for other development. Alternative schemes could propose a different mix and balance of uses from that proposed in the recommended option which the Council would need to ensure would regenerate this large important site and also benefit the wider community.

Local Employment Locations

7.134 Alternative options could protect all these sites for employment land uses, employ a criteria based assessment of the sites to identify those that were the most viable for continuation in these uses, or release the sites for housing and other suitable uses.

7.135 The ELS examined the suitability of these sites in accordance with criteria and is recommending the conclusions of this review as its suggested approach. The ELS identified a strong demand for the smaller good quality business units which most of these sites provide as they represent some of the best quality purpose built business units in the borough ⁽¹⁶⁰⁾. The areas contribute to the variety and viability of the local economy and provide some local employment opportunities in a borough where the workforce is dominated by out-commuting.

7.136 The Council has also identified sufficient sites elsewhere in the borough to meet and exceed housing provision targets, so the release of suitable employment land for which there is demand is not necessary in order to meet housing provision targets. The option to release all these areas for housing and/or other uses will therefore not be carried forward.

7.137 The former Defined Employment Area at Goodwood Road has not been recommended for continued designation in the Core Strategy. The ELS concluded that the site has become fragmented with the introduction of residential uses on Goodwood Road, and the purely commercial buildings were deteriorating. It was considered that this prominent site adjacent to New Cross Gate Station and the town centre would benefit from a treatment that would

159 ELS paragraphs 7.5 to 7.7

160 ELS Chapters 7 and 8

allow for development to enhance the attractiveness of the local environment and the station environs as a destination with the coming of the East London Line. These considerations similarly applied to the Marlowe Industrial Estate on Batavia Road, where the regeneration benefits of redevelopment would be considered to outweigh the benefits of retention of this small business estate.

- 7.138** The Plough Way Local Employment Location comprising the former Jet Stationery Building and offices at Marine Wharf in Plough Way, (Deptford) (as shown in Figure 7.5) has not been recommended for continuation in this designation. The ELS identified that the buildings in this area are isolated and unlikely to attract new and more intensive occupation in their current format. This site has therefore been recommended for inclusion in the Plough Way Mixed Use Employment Location. This addition is considered to increase the viability of the location by expanding its centre of gravity, allowing for greater flexibility in the format and placing of the various elements of the development.

Other Employment Sites

- 7.139** Alternative options could retain and protect all these sites, remove policy protection from all sites to allow for their redevelopment for housing and/or other community uses, or apply a criteria based policy for their release or retention on an individual basis.
- 7.140** The conclusions in the ELS support the retention of employment sites that meet the needs of businesses that supply services locally and to the City and which also contribute to a clustering or 'centre of gravity' that would attract further commercial, office and industrial development. These centres include the Major Town Centres of Lewisham and Catford, the borough's District Centres, and activity hubs (as defined elsewhere in the Core Strategy Options report).
- 7.141** The Council will achieve its housing targets through the development of identified sites; therefore the release of employment land which contributes to the variety and viability of the local economy is not necessary in order to meet housing targets. However, there are some sites in the borough such as builders yards, garages and small warehouses embedded in residential locations that do not meet these requirements and which could be considered for release for residential development.

Office development

- 7.142** Alternative options put forward could concentrate proposals for larger office development in Lewisham and Catford Town Centres. Smaller developments would be appropriate in District Centres with small office developments ancillary to other business and employment uses appropriate elsewhere.
- 7.143** This option ensures that large office development which tends to generate traffic and an increase in trip development is sustainably located close to good public transport.
- 7.144** The Lewisham Employment Land Study has not identified a strong office market within the borough and the outlined approach seems appropriate. This will be reflected in the Lewisham and Catford Town Centre Area Action Plan Development Plan Documents.

Live-Work developments

- 7.145** Live-work developments allow for mixed residential and business use to occur within a single unit. They have been considered to be useful in promoting starter businesses by providing facilities that a normal residential dwelling might not supply, such as proper parking and access, and doorways capable of taking goods deliveries. One of the aims of the Council is to support the development of creative industries in the borough, and to 'create a fusion of the arts, the environment and the economy'. Live-work units are considered to contribute to this aim.
- 7.146** Alternative options for these developments would see them located to ensure the continuation in use of older warehouse buildings, allow them in association with town centres and more local centres and shopping areas, or refuse planning permission in favour of residential and commercial units that did not combine these uses.
- 7.147** The Government has given new Guidance in draft PPS 4 promoting mixed use developments. Live-work developments will form a part of Mixed Use developments and can be considered on their merits elsewhere within the borough within the context of national and regional policy. It is considered that a separate approach is not needed for live-work developments.

Question 26

Employment land options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 27

Employment land issues

Are there any additional issues that need consideration?

Question 28

Employment land options and alternatives

Is there another feasible option or options having regard to the alternatives?

Question 29

Further comments

Are there any other comments relating to employment land?

7.2.1.6 Implementation and monitoring

How would the Council implement the options?

- Preparing and implementing the following local development documents:
 - A Development Plan Document for Development Policies by 2011
 - A Development Plan Document for Site Allocations by 2011
- Considering a programme of preparation of Supplementary Planning Documents for proposed Mixed Use Employment Locations
- Negotiating with developers of Mixed Use Employment Locations to meet the demand for provision of sites and premises identified in the Lewisham Employment Land Study
- Considering the use of Compulsory Purchase Powers in order to facilitate development of Mixed Use Employment Locations where sites are in different ownerships

How would the Council monitor the options?

- The delivery of mixed use employment sites
- The amount and type of new employment floorspace delivered in new developments (AMR)
- The estimated employment numbers generated by major new developments
- The number of planning permissions granted for loss of employment land (AMR)
- The amount of land released from industrial use (AMR)
- Vacancy rates in business premises and land

Implementation and monitoring

- Are there other ways the Council could implement and monitor the possible options?

Risk assessment

- 7.148** The economic downturn could affect the viability of the continued protection of employment land. There is a risk that the mixed use employment locations may not come forward for development. The economic downturn would also affect the housing market and the viability of delivering the Mixed Use Employment Locations.

Signposts and evidence base

National

- PPS3 Housing
- PPG4 Industrial and Commercial Development and Small Firms
- Draft PPS4 Planning for Sustainable Economic Development

Regional

- London Plan, 2008
- London Plan SPG Industrial Capacity, 2008

- East London Sub-Regional Development Framework
- London Industrial Land Release Benchmarks (prepared by URS for the GLA), 2007

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Lewisham Employment Land Study, 2008
- People, Prosperity, Place, Lewisham Regeneration Strategy 2008-2020
- Lewisham Local Cultural Strategy, 2002
- Lewisham Economic Development Business Plan, 2004
- Local Futures: The State of the Borough, 2004

7.2.2 Retail and town centres

7.149 The Core Strategy policy options relate to implementing strategic objective 1 by contributing to regeneration and facilitating development and strategic objective 3 by increasing economic growth and local employment opportunities and enhancing district and local centres.

Overview and summary of the issues to be resolved

7.150 The Council recognises it has an important role to play in encouraging retailing and town centre development. It must provide an adequate framework to enable the retailing industry to establish and maintain appropriate town centre facilities in a way that meets both the objectives of Government's policy and the needs of retail business.

7.151 The Government's key objective for planning in town centres is set out in PPS6 (Planning for Town Centres) and is to promote their vitality and viability by planning for the growth of existing centres and promoting and enhancing existing centres. PPS6 sets out to implement these objectives by requiring local planning authorities to:

- ensure that there is a retail hierarchy and network of town centres
- set the sequential approach to site selection
- ensure that locations are accessible and well served by a range of transport modes
- encourage the support of the night time and evening economy and
- encourage a high quality built environment through design.

7.152 In July 2008 the Government published for consultation proposed changes to PPS6. The policy approach is proposed to be refined rather than replaced and the main changes relate to how some planning applications should be considered and tested. Paragraph 2.16 of the consultation draft states that the local planning authority should work with other stakeholders to:

- assess the need for new floorspace for retail, leisure and other main town centre uses
- identify deficiencies in provision and assess the capacity of existing centres to accommodate new development
- identify the centres within their area where economic growth and development will be focused
- define the extent of primary shopping areas
- review existing sites and identify and allocate new sites and
- develop policies to promote and secure development in deprived areas.

7.153 The London Plan policies for supporting town centres include the key objectives of PPS6, which:

- encourages retail, leisure and other related uses in town centres and discourages them outside the town centres
- encourages development plans to designate core areas primarily for shopping uses and secondary areas for shopping and other uses and set out policies for the appropriate management of both types of area and
- encourages net additions to town centre capacity where appropriate to their role in the overall network.

7.154 The key opportunities for Lewisham's town centres lie in the diversification and expansion of their user markets, creating a pleasant environment, and opportunities related to cultural development, speciality retailing, the evening economy and small business opportunities.

7.155 The Core Strategy needs to:

- establish a retail hierarchy
- locate and promote any identified retail expansion in existing town centres
- manage the night time economy
- designate core areas primarily for shopping uses and secondary areas for shopping and other uses and set out policies for the appropriate management of both types of area and
- provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping.

7.2.2.1 Previous consultation responses

Summary of the Issues and Options consultation

7.156 Given that the approach to issues concerning retailing and town centres is clearly laid out in Government guidance, the Town and Country Planning Acts and the London Plan, the consultation focused on issues specific to the borough's centres such as:

- role and function
- vitality and viability
- accessibility and car parking
- high quality environment and design, and
- boundary modifications.

7.157 The responses supported any move to maintain and improve the borough's retail and town centres. Comments included the need to encourage individuality and a wider mix of shops, improving the public realm, the negative impact out-of-centre retailing can have on the vitality and viability of existing town centres, the need for an evening economy, and the need for more bicycle parking areas.

7.158 For the Lewisham town centre, respondents clearly supported enhancing its role to the benefit of the wider area and capitalising on the improved public transport links. Respondents also sought an enhancement to the evening economy.

7.159 For Catford, there was support for the centre's regeneration and overall improvement. Several comments emphasised that the town centre requires regeneration and design improvements to attract people to the area.

Summary of the Preferred Options consultation

7.160 The Government Office for London (GOL) felt the preferred options lacked local distinctiveness and repeated the London Plan. The options put forward lacked a spatial vision as to what the Council wanted to achieve for each of the borough's centres and did not relate back to the vision.

7.161 The Greater London Authority (GLA) supported the options.

7.162 Support was expressed for the promotion of Lewisham Town Centre as a Metropolitan Town Centre and maintaining Catford as a Major Town Centre within the borough's retail hierarchy, and for the proposed merging of New Cross and New Cross Gate as one District Centre. However, this merger should not allow additional retail growth in intermediate areas currently

outside a retail area, to the detriment of existing district and major town centres. Concerns were expressed that the new developments at Lewisham Town Centre should also enhance the unique identity of the centre.

- 7.163** Goldsmiths College welcomed the proposals to merge New Cross and New Cross Gate centres. It was felt there was a need for high quality design and a diverse range of retail and other facilities within the proposed merged district centre.
- 7.164** A small number of objections related to the repetition of London Plan policies, policies lacking local distinctiveness and issues regarding the loss of public houses. The Council felt that the issues relating to public houses would be best dealt with in the Development Policies DPD rather than the Core Strategy.
- 7.165** Support was received for the policy approach promoting major retail, leisure and other town centre uses and facilities within the major and district centres.
- 7.166** One comment related to the need for an up-to-date retail needs study prior to any further sites being allocated for retail uses outside the town centre.

7.2.2.2 What does the evidence say?

- 7.167** The borough's existing retail hierarchy has been determined in its adopted Unitary Development Plan (UDP) and is reflected in the London Plan.
- 7.168** Lewisham and Catford are the two major centres. Lewisham is the borough's most important commercial centre and its largest shopping centre and benefits from excellent public transport accessibility. The Council has an aspiration for the centre to achieve 'metropolitan' status in the London retail hierarchy. This would involve a minimum total floorspace for the centre of 100,000 square metres; it currently stands at approximately 85,000 square metres.
- 7.169** Catford is the borough's second largest town centre and plays an important role as the civic heart of the borough through its setting on the road, bus and rail networks. The Council has an aspiration to see significant improvement to the physical environment, which is likely to be achieved by working with commercial investors and developers to bring about the comprehensive redevelopment of the area.
- 7.170** There is a diversity of purpose and physical form in the borough's district shopping centres. The annual health checks ⁽¹⁶¹⁾ provide a guide to their current role and function. This evidence shows:
- Blackheath is one of the most successful of the centres with a thriving evening economy and is part of an important conservation area with valuable historic assets. A1 uses comprise 55%. Vacancy rates are 2%.
 - Deptford is also part of a conservation area but with a very different character from Blackheath. It is now very successful in terms of a local shopping high street and has gained a reputation for local independent shops, but it has not attracted many national chain shops. A1 uses comprise 55% of premises.
 - Downham is the smallest district centre in terms of the number of shops, although the vacancy rate is consistently amongst the lowest of all the district centres at 3% and the A1 uses amongst the highest at 6%. It primarily functions as a local convenience shopping centre for the immediate residential neighbourhood.

161 The most recent was conducted in 2008

- Forest Hill is bisected by the busy South Circular and Dartmouth Road. It has experienced high vacancy rates in recent years ⁽¹⁶²⁾ but this appears to be changing ⁽¹⁶³⁾. It has some underused sites and regeneration potential, which is enhanced by the forthcoming East London Line extension. It serves a relatively affluent catchment population.
- Lee Green shares a boundary with the London Borough of Greenwich with shops located in both boroughs. It is dominated by a 1960s-build shopping centre and a 1980s Sainsbury's store. A1 uses are low at 41% and the centre needs improving.
- New Cross has consistently shown higher vacancy rates than other district centres. As a linear centre it suffers from the high traffic flows along the A2. The centre has a high level of restaurants and take away units ⁽¹⁶⁴⁾ use that might reflect the importance of the student population from Goldsmiths College, University of London. Similarly the student population influences the night time economy offer of late night music venues. The Sainsbury's site at New Cross offers redevelopment possibilities and the area is included in the New Deal for Communities regeneration area.
- Sydenham is another linear centre, located along the A212. This centre has low levels of vacant units ⁽¹⁶⁵⁾ and appears to function well, serving the local resident population. There is some development potential around the station area.

7.171 There are two out-of-centre retail parks in Lewisham, one at Bell Green and the other on the Bromley Road near Catford. Bell Green has permission to expand to a total of 16,110 square metres of retail floorspace and the Bromley Road retail park has close to 6,940 square metres of retail floorspace.

7.172 There are also over 80 parades scattered throughout the borough and predominantly amongst residential areas which provide essential local shops and services accessible from where people live.

7.173 The borough's town centres provide significant employment and training opportunities for Lewisham residents. The majority of businesses are retailers and provide 7,500 jobs in the borough ⁽¹⁶⁶⁾. Between 1998 and 2002 this sector grew by 11%. Another growing sector within the borough's town centres is hotels and restaurants. This accounts for 3,350 jobs and has grown by 31%, outgrowing the London average by 17.7%.

7.174 The existing retail hierarchy is shown in Table 7.3.

Table 7.3 London Borough of Lewisham existing retail hierarchy

| Major Town Centres | District Centres | Neighbourhood local centres | Parades |
|--------------------|------------------|-----------------------------|---------------------------|
| Lewisham | Blackheath | Brockley Cross | There are over 80 parades |
| Catford | Deptford | Crofton Park | |
| | Downham | Downham Way | |

162 25% in 2004

163 17% in 2007 and 19% in 2008

164 31% of units in A3/4/5

165 7% in 2008 down from 10% in 2007

166 Lewisham Town Centre Management Strategy 2007-2010

| Major Town Centres | District Centres | Neighbourhood local centres | Parades |
|--------------------|------------------|-----------------------------|---------|
| | Forest Hill | Grove Park | |
| | Lee Green | Lewisham Way | |
| | New Cross | New Cross Gate | |
| | Sydenham | | |

7.175 The Council's Retail Health Checks show that there have been few changes to the hierarchy in recent years. The only change has been the growth of the local centre of New Cross Gate, which has surpassed Downham, a district centre. Retail Health Checks have identified that the New Cross Gate centre in terms of numbers of retail outlets exceeds the number located within the Downham district town centre.

7.176 The need for additional retail floorspace was assessed as part of the Lewisham Retail Capacity Assessment published in 2004⁽¹⁶⁷⁾. This identified a need for up to 26,634 square metres by 2011 and 43,900 square metres by 2016 for the whole borough. The Capacity Assessment also assessed a number of sites in the Major and District centres where some of this capacity could be met. The key conclusions and recommendations were:

- In order to meet projected growth in expenditure there is a need for additional shopping facilities within the borough.
- The borough's existing shopping role and market share in the sub-region should be safeguarded, in the face of increasing competition from centres outside the borough.
- There is capacity for additional convenience goods floorspace across the borough.
- There is significant scope for additional comparison goods retail development.
- Lewisham Town Centre should remain the main concentration of retailing (particularly comparison retailing) and there is potential to upgrade the quality of retail provision.
- Catford is likely to experience an increase in retail floorspace following completion of the urban design and development framework for the town centre⁽¹⁶⁸⁾.

7.177 This assessment needs to be updated to reflect:

- changed circumstances including the assumptions used in the calculations
- the Council's aspiration for Metropolitan status for Lewisham Town Centre
- the desire to capture more local spending and
- information from the forthcoming GLA Retail Capacity Study.

7.178 However, it is intended that the forthcoming draft Core Strategy will confirm the retail capacity needs for the borough over the plan period and the sites to accommodate that need.

7.179 It is anticipated that there will be considerable growth opportunities for the retail sector through the expansion of the Lewisham and Catford town centres, new mixed use developments in and around Deptford and New Cross town centres, and the potential for niche retailing throughout all of Lewisham's town centres.

167 Prepared by Nathaniel Lichfield and Partners

168 The precursor to the Area Action Plan

7.2.2.3 Possible options

7.180 Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 15

Retail hierarchy

The option for the borough's retail hierarchy is as follows:

Table 7.4 London Borough of Lewisham proposed retail hierarchy

| Major Town Centres | District Centres | Neighbourhood local centres | Out-of-Centre | Parades |
|--------------------|------------------------------|-----------------------------|---|---------------------------|
| Lewisham | Blackheath | Brockley Cross | Bell Green | There are over 80 parades |
| Catford | Deptford | Crofton Park | Bromley Road / Ravensbourne Retail Park | |
| | Downham | Downham Way | | |
| | Forest Hill | Grove Park | | |
| | Lee Green | Lewisham Way | | |
| | New Cross and New Cross Gate | | | |
| | Sydenham | | | |

It is proposed to combine the New Cross and New Cross Gate centres as one District Centre. This is considered advantageous due to the anticipated growth in the New Cross area over the plan period.

An Area Action Plan will be prepared for the Lewisham and Catford Town Centres. This will set out the detailed proposals to achieve metropolitan status for Lewisham and contribute to the revitalisation Catford.

Option 16

Location of retail development

The option for the location of retail development is that the Council could expect major retail development, leisure and related town centre uses and facilities, to be located within the major and district centres.

Such uses located outside these areas will be assessed against the sequential test as prescribed in PPS6.

Option 17

Lewisham and Catford Town Centres

The option for Lewisham and Catford Town Centres is that the Council would actively seek, in partnership with landowners, local businesses and service providers, to promote and improve the function, character, vitality and viability.

The Council would achieve this through the preparation of an Area Action Plan for each centre focusing on the following:

- the Lewisham Town Centre to encourage its growth to achieve Metropolitan Town Centre status in the London retail hierarchy; and
- the Catford Town Centre to ensure its regeneration and focus as the borough's civic heart so as to maintain and improve its status as a district town centre in the London retail hierarchy.

Option 18

Vitality and viability

The option to ensure vitality and viability within town centres will in part be met by designating core and non-core areas to ensure essential services are maintained.

Shop uses will be protected from loss by redevelopment or change of use and areas for other town centre functions will be identified. In the larger town centres areas in the non-core area will help provide for the uses appropriate to the night time economy.

Subject to the outcome of any consultation, the option supported by the Council would be to carry over the existing core and non-core areas as identified on the UDP Proposals Map.

Issues relating to vitality and viability will also be addressed through town centre management strategies and the action of the town centre managers.

Option 19

Environment and design

The option relating to high quality environment and design is to include policies which encourage good quality design and seek improvements to the existing retail environment.

Specific design guidelines for Lewisham and Catford Town Centres would be reflected through the centre's Area Action Plans, and for those centres located within a conservation area the relevant supplementary planning document and character appraisal. Other centres would conform to the general design requirements specified in the Core Strategy.

Option 20

Accessibility

For the issue of accessibility the option is to encourage greater accessibility by public transport, walking and cycling to all retail and town centres.

This would in part be achieved through identified projects outlined in the Council's Local Implementation (Transport) Plan and the Lewisham and Catford Area Action Plans.

Option 21

Local shopping facilities

The option for local shopping facilities will be to protect them from change of use or redevelopment where there is an economic demand for such services. In smaller centres and parades, change of use and contraction of the shopping facilities will be considered if evidence is established that there is no economic prospect of such uses continuing.

7.2.2.4 Justification for the options

Consistency with national policy and guidance

- 7.181** The options support the objectives in **PPS6**, which states that the Government's key objective for retail and town centres is to promote their vitality and viability by planning for their growth and development. This includes promoting and enhancing existing centres as the focus for retail development and encouraging a wide range of services in a sustainable environment that is accessible to all. This is reinforced through the consultation draft PPS6.

Consistency with regional policy and guidance

- 7.182** The options support the **London Plan** policies 3D.1 (Supporting town centres), 3D.2 (Town centre development) and 3D.3 (Maintaining and improving retail facilities).
- 7.183** The aspiration for Lewisham Town Centre to achieve Metropolitan status conforms with the intentions of the London Plan, which strongly supports the maintenance, management and enhancement of shopping facilities within existing centres as areas which are sustainable and necessary for city living. The South East London Sub-Regional Development Framework also identified that, following the significant levels of development anticipated within Lewisham, a review of its status within the Metropolitan hierarchy may be required.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.184** The options support the **Sustainable Community Strategy** and the theme 'dynamic and prosperous' where people are part of vibrant communities and town centres and the quality and vitality of Lewisham's town centres and localities are improved.

- 7.185** The options are also supported by the Council's work in preparing **Area Action Plans** for Lewisham and Catford Town Centres.
- 7.186** The option for the retail hierarchy to include New Cross and New Cross Gate as a combined district town centre was identified in the **Retail Capacity Assessment** undertaken for the borough. The study identified an increase in the size of New Cross Gate, which is therefore considered best suited to being amalgamated with the New Cross district town centre. This has been confirmed through ongoing retail health checks.
- 7.187** The options support the **Lewisham Economic Development Business Plan**. This acknowledges the need to revive town centres, including improvements to land use, mix of businesses, mix of activities, transport and the environment, and enhancing their attractiveness, sustainability, utility and suitability as a place of work.

What did the Sustainability Appraisal say?

- 7.188** There is a conflict between the need to strike the right balance between promoting a strong retail element for town centres and also promoting cafés, restaurants, leisure uses and the evening economy, which all compete for space with retail uses.
- 7.189** Waste and energy use will increase as a result of development, particularly for the town centres of Lewisham and Catford. However, other options focusing on minimising and mitigating the effects can ensure the impacts are reduced.
- 7.190** Flooding is a major issue for parts of Lewisham and Catford Town Centres. Development provides the opportunity for river naturalisation, which can alleviate flood risk. Other options provide for the management of flood risk in line with national planning policies and the requirements of the Environment Agency.
- 7.191** The promotion of retail uses will provide economic benefits through employment opportunities and the retention of economic activity within the borough. The retail hierarchy should improve the concentration of activity and enhance economic activity. This should reduce the need to travel as services are provided locally and public transport is focused on town centres, which are also the preferred location for a wide range of services and facilities.
- 7.192** The aspiration for Lewisham Town Centre to reach metropolitan status will create a destination of choice for the borough and beyond. This will further support the economic objectives and the well-being of the community.
- 7.193** Seeking good quality design and a high quality environment will impact positively on the natural and physical environment. Promoting sustainable modes of transport will reduce the need to travel, and impacting positively on air quality levels CO₂ emissions.

7.2.2.5 Alternative options

- 7.194** In order to be in general conformity with the London Plan it was felt that there was no option but to establish a retail hierarchy. However, it could be possible to continue with the hierarchy established in the UDP. The evidence shows the growth of New Cross Gate qualifies the centre to be designated as a district town centre. Rather than establish two separate district shopping centres in close proximity to each other, it was decided to combine this centre with the already established New Cross district centre and hence enhance the regeneration opportunities in both centres.

- 7.195** Alternative options to retain the established retail hierarchy would also involve maintaining Lewisham Town Centre as a Major town centre. However, proposals to improve the centre have been supported by the Council for many years. A number of these proposals now have planning permission. As implementation takes place, the increase in retail floorspace will be such that Lewisham will qualify as a metropolitan centre.
- 7.196** Options for the location of new retail facilities must be consistent with national policy and in general conformity with the London Plan. This means identifying need and sites to accommodate the need in the established shopping centres. As the evidence indicates this can be achieved within the existing centres, it was not felt appropriate to identify further out-of-centre retail locations. The existing facilities and planning permissions for Bell Green have been included as part of the Retail Capacity Assessment.
- 7.197** An alternative option could be not to define core shopping areas which protect shop uses. However, the Sustainability Appraisal suggests a market-led approach is likely to result in a growth of non-shop uses to the detriment of the overall health of the centres.
- 7.198** Likewise an alternative option could be to let the market determine the use in local shopping centres and parades. Again the Sustainability Appraisal indicated this could lead to the loss of local shops to other facilities including residential use that could attract higher financial values. For sustainability and equity reasons, protecting local shops is considered the most reasonable alternative.

Question 30

Retail and town centre options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 31

Retail and town centre issues

Are there any additional issues that need consideration?

Question 32

Retail and town centre options and alternatives

Is there another feasible option or options having regard to the alternatives?

Question 33**Further comments**

Are there any other comments relating to retail and town centres?

7.2.2.6 Implementation and monitoring**How would the Council implement the options?**

- Preparing and implementing the following local development documents:
 - Area Action Plans for the Lewisham and Catford Town Centres by 2011
 - A Supplementary Planning Document on development contributions to include town centre management issues
 - A Supplementary Planning Document for Conservation Areas including those retail areas within a conservation area
- Improvements to accessibility through environmental improvements and improved public transport, walking and cycling routes to be in line with the Local Implementation Plan
- Town centre management to support the borough's retailers and enhanced streetscape

How would the Council monitor the options?

- Net gain in retail uses (AMR)
- Position of town centres in the town centre hierarchy through annual health checks as prescribed by PPS6
- Lewisham Town Centre to achieve metropolitan status
- Liaison with town centre managers to monitor town centre health

Question 34**Implementation and monitoring**

- Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.199** There is a risk that the economic downturn could impact on the viability of retail and mixed use development, undermining retail and employment growth in the borough. Competing centres outside of the borough could also improve, which reduces the attractiveness of what is on offer within Lewisham if improvements and expansion are not planned for, leading to expenditure loss.

Signposts and evidence base

National

- PPS6 Planning for Town Centres
- PPS6 Planning for Town Centres: Guidance on Design and Implementation Tools
- Draft PPS6 Planning for Town Centres
- Circular 15/93: Town and Country Planning (Shopping Development) (England and Wales)

Regional

- London Plan, 2008
- Best Practice Guidance: Managing the Night Time Economy, 2007
- London-wide Town Centre Health Checks Analysis, 2006

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Lewisham Retail Capacity Assessment, 2004
- Bell Green Proof of Evidence Retail Capacity Update, 2006
- Lewisham Town Centre Health Check Report, 2007/8
- Town Centre Management Strategy 2007-2010

7.3 Climate change and environmental management

7.200 This section deals with options that can address the issues relating to climate change and environmental management. This includes:

- climate change (in its broad sense)
- waterways and flooding
- openspace and biodiversity
- waste management.

7.3.1 Climate change

7.201 The Core Strategy policy options relate to implementing strategic objective 1 by contributing to regeneration, strategic objective 4 by reducing the adverse effects of climate change, strategic objective 5 by managing the risks of flooding and strategic objective 6 by preserving open space.

Overview and summary of the issues to be resolved

7.202 Climate change is accepted as an urgent and serious issue across mainstream politics and the scientific community and is of concern to a wide range of individuals. A range of international and national agreements, policy documents and scientific studies have strengthened the call for action at all levels. This includes the Kyoto Protocol, European Directives, the Nottingham Declaration and the Government's planning policy statement on Planning and Climate Change ⁽¹⁶⁹⁾.

7.203 Tackling climate change is a key Government priority for the planning system. The importance of the role councils have in responding to climate change and promoting sustainable energy is reflected through the Government's planning statement on Planning and Climate Change. This sets out how planning should contribute to reducing emissions and stabilising climate change and take into account unavoidable consequences.

7.204 The Council needs to ensure the Core Strategy manages and mitigates the effects of climate change and provides a framework that promotes and encourages renewable and low-energy generation. Policies should be designed to promote and not restrict renewable and low-carbon energy and the supporting infrastructure.

7.205 New development within the borough will contribute to the build up of greenhouse gases in the atmosphere, influencing the determinants of climate change. The Government's Code for Sustainable Homes (CSH) and BREEAM ratings for commercial buildings set out a path for progressively raising standards across a range of environmental indicators. The CSH became mandatory in May 2008 and sets the future direction for new housing stock. However, we need to ensure there is a combined effort by the Council, developers, the community and other relevant stakeholders to ensure a cleaner, greener and more prosperous Lewisham.

7.206 This is reinforced through the London Plan, which confirms the importance of tackling climate change by requiring developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions.

169 Planning and Climate Change is a supplement to PPS1: Sustainable Development published in December 2007

- 7.207** Lewisham can play a key role in addressing the impacts of climate change and contributing to the Government's target to reduce CO₂ emissions by 60% from 2000 levels by 2050 and the Mayor of London's target ⁽¹⁷⁰⁾ to reduce regional emissions by 60% from 1990 levels by 2025.
- 7.208** The Core Strategy will need to show how the impacts of climate change can be addressed and the links between the influencing factors - development types, local air quality, flooding, waste management, transport, and design and construction - will contribute to negating other negative environmental implications.
- 7.209** The Core Strategy areas proposed to be covered include:
- adapting to the effects of climate change
 - sustainable design and construction
 - energy reduction and efficiency
 - local air quality.

7.3.1.1 Previous consultation responses

Summary of the Issues and Options consultation

- 7.210** Climate change was not put forward as a 'stand alone' issue. However, a range of options were presented which collectively contributed to addressing its effects, such as energy efficiency, flood risk, air quality, water use, waste management and the sustainable use of materials.
- 7.211** The consultation responses generally supported options to promote renewable energy and the use of recyclable materials, improve local air quality, reduce noise and air contaminations, manage flood risk, and use water efficiently.
- 7.212** Concerns were raised over the visual impacts of renewable energy technologies such as wind turbines. Suggestions were put forward wanting to see the Council promote green roofs, brown roofs and grey water recycling.

Summary of the Preferred Options consultation

- 7.213** Responses felt the broad option put forward did not provide sufficient detail. The Government Office for London indicated a need to include elements of both mitigation and adaptation within a draft policy which could be informing and be informed by the Council's Community Strategy. The GLA noted the options did not address the promotion of heating and cooling networks or the use of decentralised energy systems.
- 7.214** Developers were concerned about a strict requirement for a 20% on-site renewables target and achieving Level 3 of the Code for Sustainable Homes, and felt an element of flexibility needed to be incorporated into any proposal.

7.3.1.2 What does the evidence say?

- 7.215** Key figures relating to CO₂ emissions include ⁽¹⁷¹⁾:

170 Climate Change Action Plan, February 2007

171 As identified in the Council's Carbon Reduction and Climate Change Strategy, 2008

- UK total emissions in 2005 were 545 million tonnes a year, representing an estimated 2% of global emissions.
- CO₂ accounted for 85% of the UK's man-made greenhouse gas emissions in 2006.
- London's total CO₂ emissions in 2005 were 50 million tonnes or 9% of the total UK average.
- Lewisham is the second lowest London borough for per capita CO₂ emissions and 12th out of 33 in terms of total emissions ⁽¹⁷²⁾.
- Lewisham has a distinctly different profile for emissions by sector in comparison to the national and London average ⁽¹⁷³⁾.

7.216 A comparison of Lewisham to London and the UK is shown in Table 7.4.

Table 7.5 CO₂ emissions by sector

| | Industry and commercial | Domestic | Road transport |
|----------|-------------------------|----------|----------------|
| Lewisham | 26% | 44% | 30% |
| London | 42% | 33% | 24% |
| UK | 45% | 27% | 27% |

7.217 The emissions for Lewisham reflect its small industrial and commercial base and predominantly residential character with older properties, and its limited Underground services.

7.218 The GLA ⁽¹⁷⁴⁾ notes that by far the largest contributor to domestic emissions is space heating and cooling, which produce three times as many emissions as either water heating or appliances, and ten times as many as lighting. It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO₂ identified in the Mayor's Climate Change Strategy.

7.219 The Council is already proactively working to address sustainability issues. The borough was awarded Beacon Status in 2005/06 for work on sustainable energy and has a wide variety of programmes aimed at energy efficiency and reducing CO₂ emissions. Our achievements include:

- a reduction in energy use in the housing sector of 23% against base year 1996
- between 1995 and 2006 11,200 homes in the borough received efficient new central heating systems and improvements to insulation
- buying electricity from renewable sources, saving an estimated 30,000 tonnes of CO₂ annually from 2000 to 2004 through the use of 100% 'green electricity'
- accreditation since 2003, under the Energy Institute's Energy Efficiency Accreditation Scheme. The Institute's assessment commended the Council's 'holistic approach to energy and sustainable development' as well as its long-standing commitment to renewable energy.

172 The London average per capita is 6.9 tonnes per head of population with Lewisham at 5 tonnes, AEA Energy and Environment/DEFRA 2005

173 AEA Energy and Environment/DEFRA 2005

174 Housing in London: The Evidence Base for the Mayor's Housing Strategy, September 2007

- the introduction of a pioneering Green Procurement Guide, which was highly commended at the 2007 Local Government Chronicle awards
- from 1994 to 2007 running the South East London Energy Efficiency Advice Centre funded by the Trust
- in 2007 coordinating a London-wide climate change awareness raising programme on behalf of DEFRA
- The introduction of a new Energy Action Zone providing advice and financial support to people vulnerable to fuel poverty
- the Council landfills less than 13% of its waste, significantly less than the London and UK average. Landfill is a major contributor to climate change through methane gas.

7.220 To implement its goals the Council has a Corporate Sustainability Board and in July 2008 published a Carbon Reduction and Climate Change Strategy to ensure that the Council leads by example on energy efficiency. The Council's ambition is for Lewisham to play a leading role in responding to climate change locally, regionally and nationally with the aim of achieving the lowest level of per capita level CO₂ emissions in London.

7.221 Addressing and improving local air quality can influence some of the issues that contribute towards climate change. The key evidence relating to local air quality was highlighted in Section 3 (Drivers of change). The Council adopted an Air Quality Action Plan in 2008. This sets out measures to improve local air quality, particularly in the borough's five Air Quality Management Areas (AQMA). Air pollution from domestic, commercial and industrial sources are addressed. Some measures are also aimed to inform, involve and educate the local community. The Plan adopts wide ranging measures to reduce emissions within the borough including:

- major long-term interventions such as the extension of the rail network, road construction and road infrastructure changes, aimed to increase sustainable travel modes and reduce congestion
- hard measures such as parking controlled zones
- soft measures and smarter choices such as freight quality partnerships and travels plans
- emissions reduction such as changes to the local vehicle fleet and targeting idling vehicles
- education and public information- such as campaigns, work with local schools
- Development Control ensuring minimum impact from major development and sufficient mitigation measures

7.222 Where appropriate, these aspects have been integrated into the Strategic Spatial Options in Section 6 and the policy options under consideration in Section 7 of the Core Strategy Options Report.

7.3.1.3 Possible options

7.223 Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 22

Climate change and adapting to the effects

The option is to work in partnership on the principles of 'avoidance, mitigation and adaptation' to reduce Lewisham's CO₂ emissions. This would be achieved by:

- raising awareness of climate change issues to promote sustainable methods of living and working across the borough
- reducing the consumption of natural resources and
- promoting the sustainable and efficient use of land and improving the integration of land use and transport in accordance with national and regional requirements.

Option 23

Sustainable design and construction and energy efficiency

The option is to explore opportunities to improve the energy standards and other sustainability aspects involved in new developments. The Council would expect all new development to reduce CO₂ emissions through:

- compliance with other Core Strategy policies on sustainable movement, local air quality, waterways and flooding, sustainable design, open space and waste management and
- application of London Plan policies relevant to climate change, air quality, energy efficiency and sustainable design and construction. This would include the use of living roofs.

This option would require applications for all new major developments (with a floor space of 1000 m² or ten or more residential units) to:

- submit a sustainability statement according to the requirements of London Plan Policy 4A.3 and the London Plan SPG on Sustainable Design and Construction to demonstrate how sustainability issues have been taken into account at all levels of design and construction
- provide an Energy Statement according to the requirements of London Plan Policy 4A.4 and the London Plan SPG on Sustainable Construction and Design demonstrating the expected energy and carbon dioxide savings through a lean, clean and green strategy
- maximise the opportunity of supplying energy efficiently by prioritizing decentralized energy generation (clean) for any existing or new developments according to the requirements of London Plan Policies 4A.5 and 4A.6, and promoting the use of SELCHP (South East London Combined Heat and Power Plant) as an energy source for the mixed use sites in the Deptford New Cross area
- meet at least 20% of the total ⁽¹⁷⁵⁾ energy demand through on-site renewable energy (green) according to the requirements of London Plan Policy 4A.7
- comply with the Code of Sustainable Homes standards by achieving:
 - Level 3 by 2008

175 Calculated using Building Regulations (2006 publication) plus the CO₂ emissions associated with other energy uses not covered by Building Regulations

- Level 4 by 2010
- Level 5 by 2012 and
- Level 6 by 2016

or the equivalent standards of BREEAM if non-residential development is proposed.

This option would support and encourage the retrofitting of existing housing and other development according to the requirements of the London Plan Policy 4B.4, particularly estate renewal, which would contribute to achieving the objectives and standards for sustainable design and construction and energy efficiency.

Option 24

Improving local air quality

The option to improve local air quality and minimise any negative air quality impacts is for the Council to support a coordinated and partnership approach to implement Policy 4A.19 of the London Plan and the actions outlined in the Council's Air Quality Management Plan.

7.3.1.4 Justification for the options

Consistency with national policy and guidance

- 7.224** The options are consistent with **PPS1 Delivering Sustainable Development**. This promotes a reduction in the use of finite natural resources. The broader effect of climate change can be addressed through sustainable modes of transport and ensuring proximity to key facilities such as health, education, community, shops, work and homes to reduce travel.
- 7.225** The options support the **Supplement to PPS1 Planning and Climate Change**, which provides further details on how planning should contribute to reducing greenhouse gas emissions and thus contribute positively towards climate change.
- 7.226** The options are consistent with **PPG13 Transport** which seeks to promote more sustainable transport choices and accessibility to jobs, shops and services as well as reducing the need to travel. It also seeks to reduce car dependence by facilitating walking, cycling and planning for mixed use, and places the needs of people before the ease of traffic movement.
- 7.227** The options support **PPS22 Renewable Energy** as it promotes various types of renewable energy sources and would incorporate renewable energy requirements into the Core Strategy.
- 7.228** The options support **PPS23 Planning and Pollution Control** to address and improve local air quality.
- 7.229** The options support **PPS25 Flood Risk**. This is discussed in further detail in Section 7.3.2.
- 7.230** The option to require a stepped compliance with **BREEAM** and the **Code for Sustainable Homes** reflects the Government's legislative changes and targets requiring that all new homes will be carbon neutral by 2016. This matter has been highlighted to raise public awareness as well as ensure the implementation of the highest design and energy standards.

Consistency with regional strategy and guidance

- 7.231** The priority attached to this issue is reflected through the **London Plan**. The options are consistent with the London Plan as it promotes sustainable development, including mitigating and adapting the borough to the impacts of climate change. The London Plan through Policy 4A.2 sets a target for London of reducing carbon dioxide by 30% by 2025 against a 1990 baseline.
- 7.232** The options support Policy 4A.1, which promotes the Mayor's Energy Hierarchy of using less energy, supplying energy efficiently and using renewable energy. Policy 4A.3 (Sustainable design and construction) ensures that future development meets the highest standard of sustainable design, and Policy 4A.7 (Renewable energy) seeks to reduce CO₂ emissions by 20% from on-site renewable generation, including any provision of decentralised energy. Policy 4A.19 (Improving air quality) seeks to reduce pollutant emissions and exposure to pollution through a coordinated and partnership approach.
- 7.233** The London Plan also includes a range of policies designed to promote sustainable development, for example through reducing the need to travel and managing existing flood risk and resisting pressurising areas any further to avoid future flooding. Options relating to this issue are addressed separately.
- 7.234** The options would support the implementation of the **Mayor's Climate Change Action Plan** targeting stabilising London's CO₂ emissions at 60% below 1990 levels by 2025 and the **London Plan SPG on Sustainable Design and Construction** by ensuring development contributes to reducing carbon emissions through the design and construction phases.
- 7.235** The options are further supported by and would implement **London's Climate Change Adaptation Strategy** (draft) by responding to the climate change issue and contributing to reduced carbon emissions.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.236** The options support the implementation of the **Sustainable Community Strategy** to develop sustainable communities where people take responsibility for their impact on the environment and use resources responsibly and the strategic priority 'clean, green and liveable'.
- 7.237** Lewisham published a **Climate Change Strategic Framework** in 2006 that provides a framework for potential solutions to known and anticipated climate change; stimulates local debate and action by raising awareness; and externally promotes positive work undertaken to mitigate and adapt to climate change. The options support the Council's proposals for adaptive solutions to climate change.
- 7.238** The options support the **Carbon Reduction and Climate Change Strategy** ratified by the Mayor in July 2008. This strategy is designed to ensure that the Council leads by example on energy efficiency and has set a target to cut the Council's own CO₂ emissions by 10% and borough-wide emissions by 8.5% by 2011 (from a 2005 baseline).
- 7.239** The options support the **Lewisham Local Implementation Plan (LIP)**. This is a statutory plan to implement the London Mayor's Transport Strategy. The LIP includes measures to reduce the environmental impact of transport and provide alternatives to the car.

- 7.240** The options support the **Air Quality Action Plan** to deliver improved air quality within the borough. The focus of the Action Plan 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.

What did the Sustainability Appraisal say?

- 7.241** The Sustainability Appraisal shows each option generally making a positive impact on the sustainability objectives. The options encourage improvements in energy efficiency and reduce carbon emissions through proactive approaches. The options also encourage the promotion of on-site renewable energy for all new residential and non-residential development, carrying out SFRA's, implementation of SUDS, the use of sustainable design and construction, and improving local air quality. Negative impacts arise through the quantum of development that may arise and the need to ensure appropriate mitigation measures are in place, otherwise impacts may be more long term and cumulative.

7.3.1.5 Alternative options

Alternative options

- 7.242** Given the priority placed on the issue of climate change, the Council recognises the importance of following the guidelines set out in PPS1, PPS13, PPS22 and PPS25. This, coupled with the statutory requirements contained in the London Plan and related guidance, suggests that there is no specific need for a local policy basis within the Core Strategy since any such policy would duplicate existing national and regional policy or legislation. However, it is considered that broad options promoting climate change adaptation should be set out.
- 7.243** A local alternative option is to use the targets for the Code for Sustainable Homes (CSH) as set out in the Government's Policy Statement: Building a Greener Future ⁽¹⁷⁶⁾. This would require the achievement of Level 4 by 2013. The option put forward is considered more sustainable, as a stepped approach to implementing the CSH is proposed which would ensure greater building efficiency and reduced emissions.
- 7.244** An alternative option for improving local air quality is for the Council to only refer to the London Plan policies. However, this would not encompass the actions distinctive to Lewisham as outlined in the local Air Quality Action Plan. Therefore a two-pronged approach is proposed.

Question 35

Climate change options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 36

Climate change issues

Are there any additional issues needing consideration?

Question 37

Climate change options and alternatives

Is there another feasible option or options having regard to the alternatives?

Question 38

Further comments

Are there any other comments relating to climate change?

7.3.1.6 Implementation and monitoring

How would the Council implement the options?

- Focusing on a partnership approach with various stakeholders at different levels including public and statutory bodies such as the Environment Agency, Greater London Authority, London Climate Change Partnership, energy and water service companies, Building Research Establishment (BRE), Local Strategic Partnership, builders, developers, local businesses and other council services such as the Sustainability Energy Group.
- Implementation would be strengthened through appropriate section 106 agreements, including the preparation of a planning obligations supplementary planning document to identify suitable areas for renewable and low-zero carbon energy sources and supporting infrastructure, and recommended action to deliver renewable energy projects.
- Assessing planning applications and delivery through the development management process.
- Implementing the Council's Carbon Reduction and Climate Change Strategy covering council buildings, services and procurement; staff awareness and action; working with businesses and raising community awareness of sustainable methods of living.
- Ensuring that sustainable development principles are involved in all Council-led refurbishment and new-build projects from design to implementation.
- Delivering a step by step approach to ensuring all new homes are carbon neutral by 2016.

- Ensuring new developments are appropriately located in relation to transport facilities, that provision of cycle parking, pedestrian facilities and car parking arrangements promote sustainable transport choices
- Working with housing management organisations to deliver energy performance that meet and exceed the Decent Homes minimum standard
- Working with our RSL partners to encourage retrofitting of existing homes and encouraging attainment of CSH Level 4 and above for new development
- Implementing the actions contained in the Council's Air Quality Action Plan.

How would the Council monitor the options?

- CO₂ reduction from Lewisham Council's operations (NI 185)
- Per capita reduction in CO₂ emissions in Lewisham (NI 186)
- Planning to adapt to climate change (NI 188)
- Renewable energy capacity installed by type (AMR)

Question 39

Implementation and monitoring

Are there other ways the Council could implement and monitor the options?

Risk Assessment

- 7.245** At the strategic level, if action is not proactive or forthcoming, particularly in reducing carbon emissions, climate change and its impacts are expected to be exacerbated through localised flooding, continued poor local air quality and poorly designed homes and buildings which would affect quality of life.
- 7.246** The key factor in delivering a systematic reduction in CO₂ emissions across the borough will be the extent to which the community and other stakeholders are able to fully contribute to CO₂ reduction. The Council will need to provide local people with support, including information and financial assistance, to enable them to make decisions that will reduce their energy consumption. Empowering local people to create their own proposals for reducing energy use and consumption will also need to take place. Developers, particularly those that are smaller and locally based, will need to be aware of the Government's higher design standards and the consumer desirability of 'green homes' to ensure improved design from the outset.

Signposts and evidence base

International

- Kyoto Protocol
- Emission Trading Scheme (2003/87/EC)
- EU Energy Performance of Buildings Directive (EPBD)
- Directive on the Promotion of Electricity from Renewable Sources

- Directive on Energy End-Use Efficiency and Energy Services
- Directive on the Promotion of Combined Heat and Power

National

- PPS1 Sustainable Development
- Supplement to PPS 1 Planning and Climate Change
- PPS13 Transport
- PPS22 Renewable Energy
- PPS23 Planning and Pollution Control
- PPS25 Flood Risk
- Code for Sustainable Homes
- Draft Climate Change Bill, March 2007
- Nottingham Declaration
- Building a Greener Future: policy statement, 2007

Regional

- London Plan, 2008
- London Plan SPG Sustainable Design and Construction, 2006
- Mayor's Climate Change Action Plan, London CO₂, 2007

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Carbon Reduction and Climate Change Strategy, 2008
- Climate Change Strategy Framework, 2008
- Lewisham Energy Strategy
- Air Quality Action Plan, 2008
- Local Implementation (Transport) Plan, 2006

7.3.2 Waterways and flooding

7.247 The Core Strategy policy options relate to implementing strategic objective 4 by addressing climate change and strategic objective 5 by managing flood risk.

Overview and summary of issues to be resolved

7.248 Planning policy needs to be informed about the risk posed by flooding. This will need to be considered by the Council when it determines how to allocate land, particularly when meeting the development pressures for additional housing while at the same time preserving and managing its water resources.

7.249 Like other inner London boroughs, Lewisham is keen to take advantage of any opportunities for regeneration that arise. A number of regeneration areas have been identified by the Council and will be articulated through the Core Strategy for Lewisham, the main commercial centre of the borough, and Catford⁽¹⁷⁷⁾, Deptford and New Cross. These localities offer the potential for increased employment, improved urban spaces and the revitalisation of local communities with new housing and social infrastructure.

7.250 The River Thames has posed a risk of flooding to London for millennia, and as the city grew, the river became more and more constrained by urban development. The natural flood plain of the River Thames within London is now almost fully developed, and the northern part of the borough (like much of London adjoining the River Thames) is heavily dependent upon man-made flood defences to protect against the risk of flooding.

7.251 Lewisham has a short stretch of frontage to the River Thames and is also characterised by Deptford Creek, where the River Ravensbourne, having joined the River Quaggy just north of Lewisham, meets the Thames.

7.252 The River Thames, Deptford Creek and the Ravensbourne River network define the eight kilometres of waterways within the context of the borough. These rivers offer biodiversity benefits, good recreation and health benefits such as the South East London Green Chain, Thames Path National Trail, Waterlink Way and Route 21 of the London Cycle Network.

7.253 The rivers and waterways play a part in the visual amenity of the borough by creating a natural break in the urban environment. The rivers also provide the setting for Lewisham's historical past, which can be observed through Deptford's early 19th century industrial buildings, the preserved residential buildings in St Mary's Conservation Area located to the south of Lewisham Town Centre and the Grade II* listed building at Beckenham Place Park.

7.254 The Local Implementation Plan, South East London Green Chain, Lewisham Biodiversity Action Plan and the Open Spaces Strategy all seek to reinforce the use of waterways in the borough as an asset for environmental, social and economic needs. PPG13, the Mayor's Blue Ribbon Network and Transport Strategy set out the aspirations for protecting and enhancing the multi-functional nature of waterways so that those uses and activities which require a water or waterside location are enabled and supported.

7.255 The key objectives for planning and inclusion within the Core Strategy are appraising, managing and reducing flood risk. PPS25 (Development and Flood Risk) aims to ensure that flood risk is taken into account through all stages in the planning process:

- to avoid inappropriate development in areas at risk of flooding

177 Area Action Plans will also be prepared for the the Lewisham and Catford town centres

- to direct development away from areas at high risk of flooding and
- where new development is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and, where possible, to reduce risk overall.

7.256 Flood risk needs to be appraised by identifying flood risk areas and the level of risk. To facilitate this, PPS25 indicates that Regional Flood Risk Appraisals (RFRA) and a Strategic Flood Risk Assessment (SFRA) should be prepared. The SFRA should consider the risk of flooding throughout the borough and should inform the allocation of land for future development, development control policies and sustainability appraisals.

7.257 To manage the risk, the Council needs to develop policies which avoid flood risk to people and property, where possible, and manage any residual risk, taking account of the impacts of climate change⁽¹⁷⁸⁾. The Council should only permit development in flood risk areas if there are no feasible alternatives located in areas of lower flood risk.

7.258 To reduce the risk, PPS25 indicates that land needed for current or future flood management should be safeguarded; new development should have an appropriate location, layout and design and incorporate sustainable drainage systems (SUDS); and new development should be seen as an opportunity to reduce the causes and impacts of flooding by measures such as provision of flood storage, use of SUDS, and re-creating the functional flood plain.

7.259 PPS25 confirms that a Strategic Flood Risk Assessment (SFRA) is needed as part of the evidence base for the local development framework. This is essential as it will provide the information needed to apply the sequential approach to the identification of land for development as advocated in the guidance. This means the Council will be better informed of where and when flooding is likely to occur and the borough can better prepare in the event of a flooding incident.

7.260 The London Plan includes a number of policies relevant to flood risk in the Lewisham area. The key policies relate to flood plains; flood defences; sustainable drainage; rising groundwater; flood resilient design and climate change. The Core Strategy will need to include policies which avoid flood risk to people and property, where possible, and manage any residual risk, taking account of the impacts of climate change.

7.261 The Core Strategy policy areas proposed to be covered include:

- managing and mitigating the risk of flooding
- the river and waterways network.

7.3.2.1 Previous consultation responses

Summary of the Issues and Options consultation

7.262 The risks of flooding and the localities identified as under risk in the borough were identified as part of the Issues and Options consultation. Reference was made to flood maps produced by the Environment Agency (EA) from 2000 and 2005. A precautionary approach was advocated for planning policy given that extreme climatic trends and continued flood risks were predicted to continue. This would ensure that development minimises future risks of flooding in a sustainable way by making reasonable allowances for possible future climate scenarios.

178 PPS25, paragraph 6, Managing risk

- 7.263** Respondents were aware of the risk of river and tidal flooding in Lewisham and thought that the Council should take a proactive approach in preparing for the risks associated with climate change. The EA also noted that local flooding impacts should not be ignored.

Summary of the Preferred Options consultation

- 7.264** The Council had not completed or published its SFRA at the time of the Preferred Options consultation and dealt with flooding and its risks in a general way. This was criticized by the Government Office for London, the Greater London Authority (GLA) and the Environment Agency (EA).
- 7.265** The Government Office for London wanted to know if the Council was working with the EA to produce a SFRA and if there were any specific areas in the borough that the Council was concerned about over the risk of flooding, particularly the land that borders the River Thames, and if so how this would be dealt with.
- 7.266** The GLA, while generally supporting the Council's approach, thought the response was fairly general and less detailed than the equivalent London Plan policies. It was noted that the changes to the London Plan would amend relevant policy areas and should be reflected in any changes the Council would make to its documents.
- 7.267** The EA was pleased to see that flood risk had been considered and supported the Council's aspirations. However, the messages were felt to be unclear and greater emphasis needed to be placed on the key principles and objectives of PPS25. Further information on flood risk was sought and how the findings of the borough's SFRA will be incorporated into the process. The growth options and indeed proposed locations for development needed to be considered in terms of flood risk, informed by the SFRA and subject to the Sequential Test and Exception Test if necessary. Amendments to terminology were also requested to reflect current practice.

7.3.2.2 What does the evidence say?

- 7.268** The risk of flooding posed to properties within the borough arises from a number of sources such as river flooding, localised runoff, sewer underground systems and groundwater flooding.
- 7.269** The National Flood Risk Assessment (NaFRA) ⁽¹⁷⁹⁾ covering the whole of England and Wales is a method for flood risk assessment that uses a risk-based approach to factor in the location, type, condition and effects of flood defences. According to this assessment, properties in Lewisham fall in the categories shown in Table 7.6. All of the properties in the flood risk area adjacent to the Thames fall within the low risk category, while those in the River Ravensbourne catchment fall in the moderate or significant risk category.

Table 7.6 National Flood Risk Assessment (NaFRA) statistics for the London Borough of Lewisham

| Risk category | Number of properties at risk (residential and non-residential) |
|--|--|
| Low 0.5% (1 in 200) chance of flooding each year or less | 17,047 |
| Moderate 1.3% (1 in 75) chance or less but greater than 0.5% (1 in 200) chance of flooding in any year | 991 |
| Significant greater than 1.3% (1 in 75) chance of flooding in any year | 3,420 |
| Total number of properties at risk | 21,458 |

Strategic Flood Risk Assessment

- 7.270** In accordance with PPS25 and the London Plan, a Strategic Flood Risk Assessment (SFRA) has been produced, in consultation with the Environment Agency (EA), to better understand where and how flooding occurs in the borough and to offer potential design recommendations to influence new development. As such, all new developments will need to take into account the risk of flooding and where applicable apply the Sequential Test and Exception Test.
- 7.271** Lewisham's SFRA identifies that at least one-fifth of all residential and non-residential properties in the borough are at some risk of flooding⁽¹⁸⁰⁾. The properties generally lie within areas outlined for growth and range from Deptford and New Cross, which straddle the Thames and the Deptford Creek, to Lewisham, Catford, Lee Green, Southend and Downham which run along the River Ravensbourne, River Quaggy and the Pool River corridor.
- 7.272** The results are based on existing data currently held by the EA. The EA adopt a Flood Zone methodology, namely, 1, 2 or 3, with 3 being at greater risk of flooding to properties and endangering human life than Flood Zone 1.
- 7.273** Flood Zone 3a High Probability areas are subject to flooding in the 1% (100 year) design event. Development within these areas may only be considered following application of the Sequential Test, and 'more vulnerable' development should be avoided wherever possible. This is discussed in further detail below.
- 7.274** The SFRA has outlined specific development control recommendations that should be applied to development within Flood Zone 3a High Probability to minimise the damage to property, the risk to life in case of flooding, and the need for sustainable drainage systems (SUDS). It is essential that the developer carries out a detailed Flood Risk Assessment (FRA) to consider the site-based constraints that flooding may place upon the proposed development.
- 7.275** Flood Zone 2 Medium Probability areas are areas subject to flooding in events exceeding the 1% (100 year) event, and up to (and including) the 0.1% (1,000 year) event. 'Highly Vulnerable Development'⁽¹⁸¹⁾, for example emergency services, should be avoided in these areas. There are generally no other restrictions placed upon land use in these areas. However,

180 As identified by the NaFRA

181 Refer to Table D2 (Appendix D) of PPS25

it is important to ensure that the developer takes account of possible climate change impacts to avoid a possible increase in the risk of flooding in future years (achieved through completion of a simple Flood Risk Assessment).

- 7.276** Flood Zone 1 Low Probability areas have no restrictions placed on land use ⁽¹⁸²⁾ by PPS25. However, it is essential that consideration is given to the potential risk of flooding from other sources (outlined further on under 'Localised flood risk') to ensure that future development is not inadvertently placed at risk. It is also essential that future development does not exacerbate the current risk posed to existing homes and businesses.
- 7.277** Properties and infrastructure within the borough are also at risk of flooding from other sources. These include groundwater flooding, the surcharging of the underground sewer system, the blockage of culverts and gullies (which results in overland flow), and surface water flooding ⁽¹⁸³⁾.

The Sequential Test

- 7.278** The PPS25 Practice Guide advocates the application of a sequential approach when allocating land, taking into consideration all sources of flooding. From a spatial planning perspective, with the exception of areas known to be susceptible to regular (and problematic) groundwater flooding, it is generally considered unreasonable to restrict future development to areas that may have suffered a localised flooding incident in years past.
- 7.279** The Council's Sequential Test has informed the allocation of land as part of the Core Strategy Options. The Sequential Test sequentially guides development into areas least at risk from flooding (Flood Zone 1). Where there are no reasonably available sites in Flood Zone 1, alternative sites in Flood Zone 2 should be considered whilst taking into account the flood risk vulnerability of land uses and whether the Exception Test ⁽¹⁸⁴⁾ is required. Only after sites in Flood Zones 1 and 2 have been discounted should the suitability of Flood Zone 3 sites be considered. The Exceptions Test is the second step in the sequential approach and gives greater consideration to proposals.

Section 6 of the Core Strategy Options identified key development opportunity areas within Deptford, New Cross, Lewisham and Catford. These are located within areas of high probability of flood risk Flood Zone 3(a). The Sequential Test has assessed each site and made recommendations for future land use. Each site has satisfied the Sequential Test (and the subsequent Exception Test) by:

- demonstrating the proposed land uses provide wider sustainability benefits to Lewisham that outweigh the flood risk, informed by the SFRA
- being located on previously developed land and
- demonstrating through the SFRA that the development would be safe, without increasing flood risk elsewhere, and reduce flood risk overall.

182 All remaining areas of the borough

183 It is highlighted that detailed mapping of areas within the River Ravensbourne catchment that are potentially at risk of surface water flooding is being established by the Environment Agency. Furthermore, in liaison with key catchment stakeholders, opportunities for flood risk mitigation (including development control responses) are being developed for the River Ravensbourne catchment.

184 In accordance with PPS25, refer to the Sequential Test for details

- 7.280** However, implementation remains critical and land use acceptability will be improved subject to the approved mitigation techniques outlined in the SFRA. The potential risks of localised flooding cannot be overlooked during the design process. Whilst the identified risks will not typically result in widespread damage or disruption, a proactive approach to risk reduction through design (such as raising floor levels, raising electrical wiring, basement design, sustainable drainage)⁽¹⁸⁵⁾ can mitigate the potential for damage, both to the development itself and elsewhere.
- 7.281** An assessment of each flooding source impacting on Lewisham is provided below.

River Thames

- 7.282** The northern proportion of the borough is situated immediately adjacent to the River Thames. The majority of this area is situated within Flood Zone 3a (High Probability). Whilst the Thames poses a potential risk of flooding to properties within this area of river frontage, property is currently protected from flooding by the River Thames Tidal Defences (TTD), up to the 1 in 1,000 year event.
- 7.283** This degree of protection is effective provided that the River Thames Tidal Barrier (TTB) is operated to protect against storm surges from the North Sea and that there is a sufficient storage pool behind the barrier to accommodate the River Thames when it is shut during extreme fluvial events at high tides. The TTD are currently being reviewed to protect against climate change beyond 2030.

River Ravensbourne and River Quaggy

- 7.284** The Rivers Ravensbourne and Quaggy are key features of the borough and properties within the vicinity of the river corridors are subject to a potential risk of fluvial (river) flooding. Investment has been made 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).
- 7.285** Both the Council and the Environment Agency are encouraging a more sustainable planning-led approach to further reducing flood risk in the future. Investment has been made in flood risk management along the Rivers Ravensbourne and Quaggy both by the EA and the Council. This has included the construction of raised flood defences within Lewisham, and the development of dedicated landscaped areas for flood storage as part of ongoing regeneration. This is of particular note in Manor Park, Ladywell Fields and the Lewisham Town Centre at Cornmill Gardens and proposals for the Lewisham Gateway scheme.
- 7.286** The Council and the EA are working in partnership to prepare a River Corridor Improvement Plan for the Ravensbourne River. This is a design-led spatial improvement plan to ensure the principles of 'Making Space for Water' and the Blue Ribbon network are maximised, and that proposed future developments (including regeneration) contribute to reducing flood risk.

Localised Flood Risk

- 7.287** A potential risk of flooding from other (non-river related) sources exists from 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 of this nature will become

185 Refer to the Lewisham Strategic Flood Risk Assessment 2008 for detailed recommendations

increasingly common. It is vitally important therefore that planning decisions recognise the potential risk that increased runoff poses to property and plan development accordingly so that future sustainability can be assured.

- 7.288** The overloading of the sewer system due to inflows exceeding the underground system capacity (i.e. resulting in surcharging) is a potential problem in any urban area. It is important to recognise that surface water networks are typically designed to cater for events up to a 1 in 30 year. Surface water flooding will occur when the sewer system is overloaded and/or a system blockage occurs.

Impacts of climate change

- 7.289** The SFRA notes that climate change will not markedly increase the extent of river flooding within most areas of the borough. Consequently, few areas that are currently situated outside of Zone 3 High Probability will be at substantial risk of flooding in the foreseeable future. This is an important conclusion from a spatial planning perspective.
- 7.290** However, those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years. It is essential therefore that the development management process (influencing the design of future development within the borough) carefully mitigates against the potential impact that climate change may have upon the risk of flooding to property.
- 7.291** It is very important to note that the risk of flooding information is based on the Rivers Thames and Ravensbourne over topping their banks in times of high river surging or extreme rainfall events and the assumption that there are no flood defences present. This is a point made explicit in the SFRA. It should also be noted that the likelihood of this happening is rare but not impossible and the EA has remedial measures such as the Thames Barrier, which performs extremely well in keeping the effects of the North Sea out of the River Thames catchment area. This does not diminish the ongoing risks expected from more frequent storms and the cumulative impacts of increased development within the catchment making local rivers more susceptible to flooding.

7.3.2.3 Possible options

7.292 Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 25

Managing and mitigating the risk of flooding

The option to manage the risk of flooding is that the Council would use the requirements detailed in PPS25 and the London Plan while at the same time pursuing the recommendations of the Strategic Flood Risk Assessment and the Sequential Test in order to:

- sequentially allocate land to guide development into areas least at risk from from flooding
- prevent new development from adding to the risk of localised flooding
- reduce the flood risk to people and the built environment and to the development itself and elsewhere by ensuring the highest design standards contributing to flood reduction and mitigation
- demonstrate that the most sustainable drainage system that is reasonably practical is being incorporated to reduce flood risk, improve water quality and achieve amenity and habitat benefits and
- conserve water resources by using water saving devices and rainwater harvesting systems.

Developers will need to demonstrate that their proposal will deliver a positive reduction in flood risk to the borough, whether that be by reducing the frequency or severity of flooding (for example, through the introduction of SUDS and/or living roofs and walls), or by reducing the impact that flooding may have on the community (for example, through a reduction in the number of people within the site that may be at risk). This will need to be reflected through the inclusion of a positive statement within the detailed Flood Risk Assessment (FRA) for the site that clearly and concisely summarises how this reduction in flood risk will be delivered.

The use of the London Plan SPG on Sustainable Design and Construction will be used where relevant.

Option 26

River and waterways network

The option is that the Council will work closely with the Environment Agency to ensure the River Thames, Deptford Creek and the Ravensbourne River Network are preserved and enhanced. This includes their landscape, biodiversity, amenity and historical and leisure value.

Development adjacent to rivers should contribute to their special character by improving the urban design quality and vitality of the river frontages, improve access to the foreshore and naturalise flood defences, where appropriate.

The London Plan policies relevant to climate change and water will be used throughout the borough in conjunction with the Area Action Plans for the Lewisham and Catford town centres and the Supplementary Planning Document for Deptford, incorporating the Ravensbourne River Corridor Improvement Plan to guide works and development along this waterway.

7.3.2.4 Justification for the options

Consistency with national policy and guidance

- 7.293** The options support **PPS1**. This sets out the Government's objectives for the planning system, and how planning should facilitate and promote sustainable patterns of development, avoiding flood risk and accommodating the impacts of climate change. The **Supplement to PPS1, Planning and Climate Change**, provides expanded policy on planning's contribution to mitigating and adapting to climate change.
- 7.294** The options support the implementation of **PPS25**. All forms of flooding and their impacts are material planning considerations, which gives much weight to the issue. The aim of PPS25 is to ensure that flood risk is taken into account at all stages of the planning process in order to prevent inappropriate development in 'at risk' areas.
- 7.295** PPS25 indicates that land needed for current or future flood management should be safeguarded; new development should have an appropriate location, layout and design and incorporate sustainable drainage systems (SUDS); and new development should be seen as an opportunity to reduce the causes and impacts of flooding by measures such as provision of flood storage, use of SUDS, and re-creating the functional flood plain.

Consistency with regional strategy and guidance

- 7.296** The options support the **London Plan**, which identifies the management of flood risk as extremely pertinent to London. Consequently the Plan seeks to ensure that all future development minimises the risk of flooding within the capital. The options reduce flood risk through appropriate location, design and construction of development and the sustainable management of surface water run-off. Lewisham has also completed and published a Strategic Flood Risk Assessment. The options support London Plan policies 4A.12 (Flooding), 4A.13 (Flood risk management) and 4A.14 (Sustainable management).
- 7.297** The options support the **London Plan's Supplementary Planning Guidance on Sustainable Design and Construction**. Clause 2.4.4 of the SPG (Water Pollution and Flooding) sets out a series of standards that are to be sought through local planning policy. These form the framework within which the development control recommendations established within the Lewisham SFRA have been developed (in consultation with the Council and the Environment Agency). The 'Essential Standards' sought through the SPG are:
- use of SUDS measures wherever practical and
 - achieve a 50% attenuation of the undeveloped site's surface water run-off at peak times.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.298** The preferred options support the implementation of the **Sustainable Community Strategy** by contributing to the priority 'clean, green and liveable', where people live in high quality housing and care for and enjoy their environment, and protecting and enhancing our parks, open spaces and local biodiversity.

- 7.299 The application of the **Lewisham SFRA** and the **Sequential Test** will ensure development mitigates against flood risk. This provides a robust and sustainable approach to the potential impacts that climate change may have upon the borough over the next 100 years, ensuring that future development is considered in light of the possible increases in flood risk over time.
- 7.300 The options support the **Draft Ravensbourne River Corridor Improvement Plan**. This draft plan (currently being prepared) considers the risks of flooding (from all sources) within the River Ravensbourne catchment and highlights tangible (prioritised) actions that ultimately will reduce the risk of flooding. The Plan is being led by the Environment Agency; however, importantly the study has sought to engage wider stakeholders including Thames Water. The Plan provides key actions not only for those responsible for improving critical infrastructure that will reduce the likelihood of flooding from rivers and the surface water drainage system. It also targets improved community education and awareness, and development control, seeking to reduce the impact that flooding may have when it occurs.

What did the Sustainability Appraisal say?

- 7.301 The options had a positive impact on most of the sustainability objectives. The improvement work along river corridors will bring both social and environmental benefits directly or indirectly to the borough, such as reducing the fear of crime, promoting social inclusion and other benefits to the natural and historic environment of the borough. Managing and mitigating the risk of flooding are likely to promote sustainable economic growth and healthy lifestyles. They will also help in minimising the production of waste indirectly and ensuring the efficient use of natural resources such as water. The Sustainability Appraisal recommends including 'living roofs and walls' in Option 24 instead of only 'living roofs'.

7.3.2.5 Alternative options

- 7.302 The application of the SFRA ensures the Council considers all suitable and alternative locations for development to reduce flooding risk within the borough. The use of the Sequential Test has supported the land uses proposed for the allocated sites, which were further supported through the Exception Test. The application of the SFRA recommendations to mitigate flood risk will need to be rigorously applied to support the Council's regeneration and growth strategy.

Question 40

Waterways and flooding options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 41

Waterways and flooding issues

Are there any additional issues that need consideration?

Question 42**Waterways and flooding options and alternatives**

Is there another feasible option or options having regard to the alternatives?

Question 43**Further comments**

Are there any other comments relating to flooding?

7.3.2.6 Implementation and monitoring**How would the Council implement the options?**

- Use of the Lewisham Strategic Flood Risk Assessment (SFRA) for development management purposes to prevent new development from adding to the risk of localised flooding.
- As a minimum, the implementation of sustainable drainage systems (SUDS) must be ensured and careful consideration of overland flow routes (and avoidance of their obstruction) as part of the site design should be encouraged.
- The Ravensbourne River Corridor Improvement Plan (once adopted) will identify ways in which the River Ravensbourne can be naturalised to allow extra storage capacity in times of flooding and to enhance local wildlife and habitats in line with regeneration opportunities. This is a joint venture between LB Lewisham and the Environment Agency. This Plan ties in with the EU Interreg IVb Urban Rivers for Urban Renewal Project and serves as the foundation for implementing (constructing) the Ravensbourne at Deptford Flood Alleviation Scheme. This flood alleviation scheme will reduce the risk of flooding to 500+ properties.
- Emergency planning is imperative to minimise the risk to life posed by flooding within the borough. It is recommended that the Council advises the local Resilience Forum of the risks raised in light of the Lewisham SFRA, ensuring that the planning for future emergency responses can be reviewed accordingly.

How would the Council monitor the options?

- Length of river/waterways restored
- Number of planning applications adhering to SFRA recommendations
- Number of planning applications granted contrary to Environment Agency advice
- Number of planning applications accompanied by a Flood Risk Assessment (FRA)
- Number of planning applications proposing SUDS and living roofs and walls

Question 44**Implementation and monitoring**

- Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.303** There is a risk that national or regional funding for projects to address waterways and flooding within the borough and regionally could be reduced or withdrawn. This risk is considered to be low given the importance of climate change, its legislative basis and the need to ensure flood defences are improved to accommodate increased housing and population.
- 7.304** It is crucial to recognise that not only does PPS25 consider the risk of flooding posed to new development, but that it also seeks to positively reduce the risk of flooding posed to existing properties within the borough. This principle needs to be adopted as the underlying 'goal' for developers and Council's development management team.
- 7.305** If the risk of flooding is not addressed and the Council did not take account of the SFRA or Sequential Test, homes and lives could be placed at risk.

Signposts and evidence base**National**

- Planning and Climate Change (Supplement to PPS1)
- PPS3 Housing
- PPG13 Transport
- PPS25 Flooding and related Good Practice Guide

Regional

- London Plan, 2008
- London Plan SPG Sustainable Design and Construction, 2006

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Strategic Flood Risk Assessment, 2008
- Sequential Test, 2009
- Ravensbourne River Corridor Improvement Plan, 2008
- Local Implementation (Transport) Plan, 2006
- Lewisham Open Spaces Strategy, 2004

7.3.3 Openspace and biodiversity

7.306 The Core Strategy options relate to implementing strategic objective 4 by addressing climate change issues, strategic objective 5 by addressing flood risk and strategic objective 6 by protecting and enhancing the borough's open spaces and environmental assets.

Overview and summary of issues to be resolved

7.307 Open space plays an essential role in the life of local residents in the borough. Well-designed and managed spaces can help bring communities together and provide a place to meet and relax or enjoy sport and active recreation. This has benefits of its own as it provides space for healthy lifestyles and breaks the barriers which contribute to social exclusion.

7.308 PPS2 Green Belt Note 2 discusses the protection of Metropolitan Open Land. PPS9 (Biodiversity and Geological Conservation) seeks to promote sustainable development by ensuring that biological and geological diversity are conserved, enhanced and restored. PPS17 (Planning for Open Space, Sport and Recreation) focuses on supporting urban renaissance, promoting social inclusion, community cohesion, health and well-being. The Core Strategy will seek to prevent the development of open space unless an assessment of open space otherwise dictates.

7.309 The London Plan seeks to protect and enhance open spaces, biodiversity and nature conservation in London, including the access to London's network of open spaces. Of particular importance is the maintenance and protection of Metropolitan Open Land (MOL), which is considered to have strategic importance for the whole of London.

7.310 The Core Strategy needs to ensure that areas of open space are protected and conversely that areas of deficiency are identified and addressed. The Council also needs to take a proactive approach to the protection, promotion and management of biodiversity. This can be achieved by resisting development that would have a significantly adverse impact on the population or conservation status of protected species or priority species identified in the UK, London and borough biodiversity action plans. The Core Strategy will also need to avoid adverse impacts on species or the value of nature conservation sites and protect, maintain and enhance trees and woodlands.

7.311 The Core Strategy policy areas proposed to be covered include:

- the protection of existing open space
- dealing with deficiencies of open space
- the capture of new open space in large developments
- quality and maintenance
- the protection of natural habitats and biodiversity, including ancient woodlands
- the river network
- London Squares and Historic Parks and Gardens.

7.3.3.1 Previous consultation responses

Summary of the Issues and Options consultation

7.312 Consultation focused on open spaces being protected and not encroached upon by development and recognised their importance as green pockets in a built environment. A focus group session provided an opportunity to look more closely into how open space impacted on residents' quality of life. Members commented upon the importance of clean air, a clean environment, the fact that open spaces are a free facility and the visual importance

of open spaces. Even those group members who did not use parks and open spaces acknowledged their value and recognised that they have a positive impact upon the quality of life of local communities.

- 7.313** The approach to protect existing open space and increase new provision was widely supported, in particular through increasing open space provision to a standard of 1.7 hectare per 1,000 population. Further support existed for enhancing and creating new public open space and avoiding inappropriate development. Comments were made that the amount of new development proposed would cause the ratio of open space per head of population to decrease.
- 7.314** Every response to the consultation favoured the Council's approach to improve the quality of all types of open spaces in the borough, ensuring their use is maximised for the purposes which they were created.
- 7.315** Other points raised supported the protection and enhancement of natural habitats and biodiversity, including the need to improve availability in areas of deficiency. Further protection and enhancement are also supported for the borough's ecological and recreational links and corridors.

Summary of the Preferred Options consultation

- 7.316** The Preferred Options consultation focused on a set of preferred policies which addressed issues such as Metropolitan Open Land, public open space, urban green space, open space quality, maintenance and deficiency.
- 7.317** The Government Office for London commented that many of the policies lacked local distinctiveness.
- 7.318** The Greater London Authority (GLA) commented that there appeared to be no specific policy protecting Metropolitan Open Land in accordance with London Plan policy. The target of open space provision put forward in the Issues and Options consultation was supported and should be reflected in the Core Strategy. They supported the open space deficiency draft policy but thought that it should be expanded to address deficiencies in children's play space and access to nature.
- 7.319** The Environment Agency made specific comments in relation to avoiding river channelisation and tall buildings near watercourses, and the need for buffer strips and naturalised riverbanks ⁽¹⁸⁶⁾.
- 7.320** Local community groups commented that the community should be supported and engaged in the maintenance of public open space, and that safety and accessibility are major concerns. Open Space was seen as essential for the development of children and young people, for socialising and for exercise.
- 7.321** The Lewisham Green Party objected to a policy that protected both the built and the green environment and thought that the issues should be treated separately.
- 7.322** Other comments were in general supportive of the Preferred Options, including the retention of all existing open space in the borough.

186 The location of tall buildings is now dealt with in section 7.42

7.3.3.2 What does the evidence say?

- 7.323** Open space in Lewisham, in public and private ownership, makes up almost 20% of the borough's land area (689 ha), of which:
- 415 ha are classified Public Open Space
 - 69 ha are classified as green corridor (rail side land)
 - Almost 300 ha are classified as MOL and
 - Just over 300 ha are designated as Sites of Nature Conservation Importance ⁽¹⁸⁷⁾.
- 7.324** This makes up a network of spaces from the large expanses of Blackheath in the north and Beckenham Place Park in the south, with a network of smaller parks and open spaces, playing fields, both public and private, and green routes in between. The River Thames itself provides a valuable open space resource. Other types of open spaces are also important in the context of a densely built-up area, such as roof terraces, wildlife gardens, allotments and amenity areas around housing estates. Civic spaces and squares, such as Cornmill Gardens and the proposed Catford Town Square, also form part of the open space network.
- 7.325** The borough hosts part of the South East London Green Chain, which is a network of inter-linked open spaces that extend through Lewisham, and the neighbouring boroughs of Bexley, Greenwich and Bromley. The Green Chain has a network of recreational walking and cycle routes and it also forms part of the 'Capital Ring', a strategic walking route linking inner London boroughs by a network of paths through open spaces, green links, canals and rivers. Proposals exist to extend the Green Chain walk within Lewisham via parks on the western side of the borough (Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park), linking to Crystal Palace Park in the London Borough of Bromley. This will involve redesignation of these Local Public Open Spaces as Metropolitan Open Land to reflect the strategic significance of the new Green Chain Link.
- 7.326** Lewisham's rivers (a short section of the Thames and longer stretches of the Ravensbourne and its tributaries the Pool, Quaggy and Spring Brook) provide important linear features which can form the basis for wildlife corridors and are important links to sustain biodiversity. The naturalisation of waterways is a priority for the Council and a suitable buffer zone around watercourses can help to maintain the character of rivers and provide refuges for wildlife, as well as pleasant and practical recreational routes such as the Waterlink Way and the long distance Thames Path. These routes are referred to further in section 7.4.1, as they form part of the recognised strategic cycle network.
- 7.327** The borough also has a number of London Squares ⁽¹⁸⁸⁾ that provide a locally distinctive feature, particularly the sequence of small open spaces on Rushey Green between Catford and Lewisham following the line of a former watercourse, and two Grade II Historic Gardens at Horniman Gardens and Manor House Gardens ⁽¹⁸⁹⁾.
- 7.328** With the predicted rise in population over the plan period, open space will come under increasing pressure for use and development. The existing capacity of open space in Lewisham amounts to 16.95 square metres per person or 1.695 ha per 1,000 population ⁽¹⁹⁰⁾.

187 It should be noted that Open Space designations overlap. The figures for the various types of open space quoted here therefore add up to more than the total amount of open space quoted for Lewisham

188 London Squares Act, 1932

189 Register of Historic Parks, Gardens and Landscapes, English Heritage

190 Based on 2007 ONS mid-year estimates of population as 244,879

- 7.329** There are various standards that have been applied to judge the adequacy of open space provision per 1,000 of population. The Fields in Trust '6 acres per person' standard states that public open space provision should be 2.43 ha per 1,000 population. The lower '4 acre per head' (1.6 ha) standard in the 1943 Abercrombie Plan for London was designed to reflect the nature of inner London land use.
- 7.330** The Social Infrastructure Framework Working Paper (SIF) estimates that in order to maintain the current per person ratio of 16.95 square metres, in the face of projected population increases, Lewisham must increase its public open space provision by 9.6 ha by 2012.
- 7.331** The Open Space Strategy for Lewisham (2005-2010), sets out a local standard of 1.7 ha per 1,000 persons which would require an extra 10.9 ha of public open space provision by 2012. The Strategy also identifies a District Park deficiency area affecting some of the Mixed Use Employment Locations identified for high density development in Strategic Spatial Options 1 and 2.
- 7.332** The Social Infrastructure Framework (SIF) identified specific deficiencies in relation to playing fields (24 ha by 2012), a deficiency in children's play space to be specified following an audit by the Council's open space contractor later in 2008, and a 36.18 ha deficiency in allotments.
- 7.333** A Strategic Flood Risk Assessment (SFRA) has been completed for Lewisham. The main issue arising from the SFRA is that the rivers Ravensbourne and Quaggy are susceptible to flooding and pose a potential risk to properties and life within the flood plains. There are proposals to allow some open space to act as temporary flood plains and water storage areas. This has already taken place in Cornmill Gardens, Ladywell Fields and Chinbrook Meadows. This topic is dealt with in Section 7.3.2 Waterways and flooding.

7.3.3.3 Possible options

- 7.334** Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 27

Open space protection

The option is to continue the protection of all Metropolitan Open Land, public open space and urban green space from inappropriate built development to ensure there is no adverse effect on their use, management, amenity or enjoyment in accordance with the principles of PPG2 and the London Plan.

The Council will designate new Metropolitan Open Land in accordance with the London Plan definitions, in particular Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park due to the new role they will perform in the South East London Green Chain.

Option 28

Open space provision

The option is that the Council will look to improve the quality and accessibility of open space in the borough. In part this will be assisted through contributions from new developments to address areas of open space deficiency.

A qualitative approach, rather than a quantitative approach, would be adopted. An improvement in the quality of existing open spaces could provide greater recreational and biodiversity opportunities to both new and existing residents.

The development of the Mixed Use Employment Locations in the Deptford/New Cross area of the borough proposed in Strategic Spatial Options 1 and 2 will place increasing pressure on the open space infrastructure, in particular in relation to the district park deficiency areas⁽¹⁹¹⁾. Specifically Convoys Wharf, part of Oxestalls Road, and Arklow Road and Childers Street fall into the identified deficiency area.

It may not be physically possible to remedy the district park deficiency due to the dense urban form of this area. The Council is however proposing to remedy this by:

- new green links through the Oxestalls Road Mixed Use Employment Location through to the Plough Way Mixed Use Employment Location area, capitalising on the course of the former Surrey Canal through both these sites
- new areas of green space within all these developments
- creating new civic spaces and water features at Convoys Wharf
- increasing the connectivity of this area with the rest of the borough, which will improve access to local and district park facilities in an area acknowledged to be isolated and disconnected⁽¹⁹²⁾.

The Council will seek to improve open space provision by negotiating a planning obligation with developers of these sites to remedy other specific deficiencies identified.

Option 29

Biodiversity

The option is to preserve and enhance the local biodiversity and geological conservation interests. The Council would use existing regional and national policy, in the form of PPS9 and the London Plan. Lewisham has a range of interesting and important habitats in the London context, including ancient woodland, rare grasslands, rivers and tidal creek, ponds and extensive areas of railside woodlands and shrubland.

191 London Plan: A District Park is a large area of open space that provides a landscape setting with a variety of natural features providing for a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits. Size guideline is 20 ha and up to 1.2 kilometres from homes.

192 Deptford/New Cross Masterplan 2007

Option 30

Waterways naturalisation

The option is to encourage proposals for naturalisation of waterways in conjunction with the Environment Agency (EA).

In the main this will be achieved using regional policy in the form of the London Plan. Individual local plans may be required, such as the Ravensbourne River Improvement Plan, and these will be considered in conjunction with any EA requirements where appropriate.

Option 31

Character and design of open space

The option is that the Council would encourage the use of exemplary design and, where new development occurs, ensure publicly accessible and usable open space is considered in the context of the local character and its distinctive historical qualities working with the Environment Agency (EA) where appropriate.

7.3.3.4 Justification for the options

Consistency with national policy and guidance

- 7.335** The national statutory guidance on maintaining the supply of open space is clear. **PPS9 Biodiversity and Geological Conservation** seeks to promote sustainable development by ensuring that biological and geological diversity are conserved, enhanced and restored. **PPG17 Planning for Open Space, Sport and Recreation** states in paragraph 10 that open space should not be built on or developed without a robust and up-to-date assessment proving that the land is surplus to requirements. **PPG2 Green Belt** Note 2 contains further guidance on protecting MOL. In combination these national policies remove the need for local policy regarding the protection of existing open space.
- 7.336** **PPG17**, in paragraphs 6 and 7, outlines the process for local authorities to set their own open space standards. The standards should cover quantitative elements, a qualitative component and accessibility, and be based on assessments of need and audits of existing facilities.
- 7.337** The quality of existing facilities is covered further in paragraph 18. It warns against considering poor quality or under use as signs of absence of need, where the improvement of the value of existing facilities through better management and capital investment may increase both quality and usage. Further, the improved accessibility of open spaces is encouraged through understanding mobility issues and using good design to reduce crime. The options adhere to and support this guidance.
- 7.338** **PPG17** paragraph 33 informs local authorities that they should seek planning obligations where the quantity or quality of provision is inadequate or under threat, or where new development increases local need. Further advice on the process is available in PPG17 and in the associated good practice guide.

Consistency with regional strategy and guidance

- 7.339** The **London Plan** recognises the importance of sports and recreation facilities to the population of London. Policy 3D.6 provides guidance when considering proposals for sports facilities to ensure they meet local and sub-regional requirements. It looks at the importance of improving access by transport and walking, and the accessibility for all sections of the community. It goes on to stress the need to focus provision on deficient areas and make multiple use of facilities, in order to maximise usage. Further advice in paragraph 3.290 supports PPG17 in requesting that facilities are of high quality.
- 7.340** The London Plan has a clear view on open space and adopts a strong stance to working with strategic partners to protect, promote and improve access to London's green network. It encourages local authorities to protect existing provision and expects new development to incorporate appropriate elements of open space. The options support Policies 3D.8 (Realising the value of open space and green infrastructure), 3D.10 (Metropolitan Open Land), 3D.11 (Open space provision in DPDs) and 3D.12 (Open space strategies).
- 7.341** Policy 3D.13 advises of the Mayor of London's intention to ensure safe access to play facilities for children, ensuring they are of good quality and secure. Local authorities are encouraged to create suitable strategies on play and informal recreation to assist in this process, focusing on improving access and opportunities for all children and young people in the borough. It goes on to say that where new development occurs, provision for play and informal recreation, based upon the expected child population, should be allowed for.
- 7.342** The options support the **Mayor of London's Making Space for Londoners** project. This seeks to create or upgrade 100 public spaces in London in order to ensure that all in London can benefit from good public space. Lewisham Town Centre transport interchange is identified in this document as requiring high quality design, as is the Kender Triangle at New Cross Gate.
- 7.343** The options support the **Mayor's Biodiversity Strategy**, which proposes policies and partnerships to enhance and protect London's biodiversity.
- 7.344** The options support the **Greenspace Information for Greater London, Framework Document**, which lists the statutory provisions for wildlife protection.
- 7.345** The options support the **Thames Strategy East** concept of the East London Green Grid, which is concerned with access for all to the open space resource of the River Thames through a coordinated infrastructure of public and private transport, cycle paths and bridleways.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.346** The options support the implementation of the **Sustainable Community Strategy**, which seeks a clean, green and liveable environment by protecting and enhancing our parks, open space and local diversity.
- 7.347** The options address the vision in the Council's **Open Spaces Strategy** (2005-2010), which is 'To protect, enhance and cherish open spaces for the benefit of local people, the wider community and future generations.'
- 7.348** The options acknowledge the three broad aims of the **Lewisham Physical Activity, Sport and Leisure Strategy** (2006-2011) to:
- increase participation in physical activity and sport

- enable the Lewisham community to develop its potential in sport and
- develop an appropriate infrastructure of facilities.

7.349 The options address the aims of the **Green Chain Policy document (1977)**, which are to improve public access to and through the area, and to create new public footpaths and enhance access where opportunities occur.

What did the Sustainability Appraisal say?

7.350 It was considered that the most sustainable approach to protecting open space in the borough would be to set a target based on population growth and space to be retained, i.e. hectares per 1,000 population. Data for 2007 suggests that this ratio would need to be maintained at a level of 1.695 ha per 1,000 population. This would mean that even a relatively small increase in population, in terms of Lewisham's plans, of say 10,000 would require an increase in open space provision that is not viably available in an inner London borough such as Lewisham.

7.351 The options seek to address the social, environmental and economic needs of the borough's inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment and to promote economic rejuvenation. The use of open space can benefit many areas directly and indirectly. The inclusion of 'safer by design' in the options will strengthen the future policy with respect to reducing crime. Although this option alone cannot reduce crime, it can lessen public perception of crime in Lewisham's open spaces. It is not considered that enhancement or mitigation measures are needed at this stage as the options cover the strategic objectives.

7.352 There are some uncertainties and risks that could prevent the options from being fully realised and these could stem from changes in central and regional government, extreme climate change, economic change and underestimated population growth.

7.3.3.5 Alternative options

7.353 Since the publication of PPS12⁽¹⁹⁹³⁾ it has become apparent that Development Plan Documents such as the Core Strategy should not seek to repeat or duplicate national and regional planning guidance but instead should seek to introduce policies that are locally distinctive. National and London Plan policies will be used to protect Metropolitan Open Land and other types of open space, improvements to river corridors, valuable elements of the natural environment, and the quality and accessibility of all open space.

7.354 The major alternative option available is to set a target of 1.7 ha per 1,000 population for open space provision as identified in the Council's Open Space Strategy. This option identifies that by 2012 10.9 ha of new open space would be required to meet this standard. This option is not recommended due to its impracticality in the context of Lewisham which is densely developed and does not have large sites available to supply such an amount of open space.

7.355 It is considered that there will be opportunities in the larger new developments proposed in Strategic Option 1 to provide new forms of open space, which would also improve accessibility to other open spaces. However, the Council is committed to improving the quality and usage of all open space in the borough and considers that these qualitative improvements will succeed in making the existing provision attractive and well used, which has been reflected in the options put forward.

Question 45**Open space and biodiversity options**

Do you support the possible options for inclusion in the draft Core Strategy?

Question 46**Open space and biodiversity issues**

Are there additional issues that need consideration?

Question 47**Open space and biodiversity options and alternatives**

Is there another feasible option or options having regard to the alternatives?

Question 48**Further comments**

Are there any other comments relating to open space?

7.3.3.6 Implementation and monitoring

How would the Council implement the options?

- Preparation of a Supplementary Planning Document to support negotiations with developers on the provision and improvement of open space
- Collaboration between Glendale Services (who maintain the borough's public open spaces) and the Council's Development Control, Planning Policy and Environmental Services teams
- Further liaison with key flood risk partners including:
 - the Council's drainage team
 - the Environment Agency
 - Thames Water
- Adopting and implementing Lewisham's River Corridor Improvement Plan in consultation with the Environment Agency to identify ways in which the River Ravensbourne can be

naturalised to allow extra storage capacity in times of flooding and also to enhance local wildlife and habitats in line with regeneration opportunities

- Facilitating the implementation of key actions from the Open Space Strategy for Lewisham 2005-2010, to improve the quality, accessibility and usage of open space and the associated facilities
- Negotiating with developers on key sites to ensure that open space and quality improvements are secured through a planning obligation.

How would the Council monitor the options?

- The number of planning applications for new open space and sports, recreation and child's play facilities or improvements to quality and access
- The percentage of eligible open spaces managed to Green Flag award standard
- The amount of open space created/developed to include allowance for water storage during times of extreme wet weather
- Monitoring loss and gain of open space

Question 49

Implementation and monitoring

Are there other ways the Council could implement and monitor this preferred option?

Risk assessment

- 7.356** The risk posed to open space and biodiversity is minimal given the level of protection afforded to open space and biodiversity in inner urban areas. A political shift could direct Government towards a different strategy, but this is considered unlikely within the lifetime of the Core Strategy. The options are given rigour with an element of flexibility to cope with shifting needs and opportunities informed by a comprehensive evidence base.
- 7.357** The Council could at various times experience financial constraints that could lead to a re-direction of budgets away from the maintenance of open space. In the context of an economic downturn, new developments which could have been expected to provide open space improvements might not proceed.

Signposts and evidence base

European

- Water Framework Directive (WFD) 2000/60/EC
- Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ('Habitats Directive')

National

- PPG2 Green Belts
- PPS9 Biodiversity and Geological Conservation

- PPG17 Planning for Open Space, Sport and Recreation
- London Squares Act, 1932
- Conservation (Natural Habitats, &c.) Regulations, 1994
- Natural and Environment and Rural Communities Act, 2006
- Circular 5/2005: Planning Obligations, 2005
- Circular 11/2005: The Town and Country Planning (Green Belt) Direction 2005
- Association of Local Government Ecologists, Biodiversity Data Needs for Local Authorities and National Park Authorities, 2006

Regional

- London Plan, 2008
- Mayor of London, Making Space for Londoners
- Mayor of London, Biodiversity Strategy
- Greenspace Information for Greater London, Framework Document, 2005
- Thames Strategy East, 2008

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Lewisham Open Spaces Strategy, 2004
- Lewisham (A natural renaissance for Lewisham) Biodiversity Action Plan, 2006
- Lewisham Physical Activity, Sport and Leisure Strategy, 2006
- Green Chain Policy Document, 1977
- Ravensbourne River Corridor Improvement Plan (under preparation)

7.3.4 Waste management

7.358 The Core Strategy policy options relate to implementing strategic objective 4 by addressing climate change and strategic objective 7 by addressing waste management.

Overview and summary of issues to be resolved

7.359 The key priority for Lewisham is to minimise the amount of waste going to landfill and contribute towards London being more self-sufficient in waste disposal. This is critical given the limitations on space and capacity for materials to be disposed.

7.360 The European Waste Directive (Directive 2006/12/EC) sets out the requirement for the European community and member states to become self-sufficient in waste disposal. At the national level, the Government's Waste Strategy 2000 sets out the framework for managing waste to meet recycling and recovery targets.

7.361 PPS10 (Planning for Sustainable Waste Management) has placed detailed requirements on local authorities to provide policies and site specific proposals for dealing with an identified amount of waste through their development plan documents in their local development frameworks. The London Plan has identified borough waste level apportionments. The waste apportionments have been allocated among London boroughs to ensure that London's target for 85% self-sufficiency in dealing with its waste is achieved by 2020.

7.362 With national waste growth projected at 2 to 3% per annum, the overall tonnage of waste in Lewisham could be around 160,000 tonnes by 2010⁽¹⁹⁴⁾. Therefore a proactive and partnership approach to waste management needs to be adopted. At the corporate level, Lewisham has a draft Municipal Waste Management Strategy which sets out an action plan to deliver improved performance in the management of waste and focuses on increasing recycling and composting targets.

7.363 The Core Strategy will therefore need to show how Lewisham will meet its apportionment as set out in the London Plan, allocate appropriate sites for waste management and reflect and support corporate waste management objectives and actions to contribute to the waste hierarchy.

7.364 The Core Strategy policy areas proposed to be covered include:

- waste apportionment
- public awareness
- identification of waste management sites
- promoting the waste hierarchy.

7.3.4.1 Previous consultation responses

Summary of the Issues and Options consultation

7.365 The responses supported increasing recycling in the borough and providing more domestic facilities for waste disposal. There was support for new development to adopt waste management principles in order to avoid any additional on-site waste facility. There was also a common consensus to manage existing waste management facilities and minimise any adverse impact on their surrounding localities.

194 Lewisham Draft Municipal Waste Management Strategy, 2007

Summary of the Preferred Options consultation

- 7.366** The Government Office for London noted there was no reference, within either the policy or supporting text, to what the Council's apportionment figure is or the borough's current capacity. Details were expected on safeguarding sites and allocating all those sites which are key to the Core Strategy's waste function.
- 7.367** The Greater London Authority (GLA) supported the general intent of the options. However, further detail was requested on waste apportionment to demonstrate how the Council would meet its target. Concern was also raised over the capacity of identified waste sites, including those located within the Surrey Canal Strategic Industrial Location (SIL), to handle the waste apportionment.
- 7.368** Other representations suggested the inclusion of Convoys Wharf as a waste management facility.

7.3.4.2 What does the evidence say?

- 7.369** Lewisham and the four southeast London boroughs ⁽¹⁹⁵⁾ are preparing a Joint Waste Apportionment Technical Paper to identify the capacity for handling waste in the sub-region and demonstrate that the southeast London boroughs collectively meet their obligations arising from the London Plan waste apportionment allocations.
- 7.370** The southeast London boroughs, through the evidence supplied by this technical paper, have identified the land that they intend to designate as safeguarded strategic waste facility sites in their core strategies (and other development plan documents, if needed). The combined annual waste capacity of these safeguarded sites will meet all of the apportionment requirements for the sub-region.
- 7.371** The results for the sub-region show a projected surplus over the GLA waste apportionment requirements of 13,000 tonnes per annum at 2010, 398,000 tonnes per annum at 2015, 379,000 tonnes per annum at 2020, and 358,000 tonnes per annum at 2025.
- 7.372** The total apportionment requirement for Lewisham is 323,000 tonnes (including commercial and industrial waste), for which the Council has identified sufficient land at the Surrey Canal SIL. There are three sites:
- South East London Combined Heat and Power (SELCHP) plant
 - Hinkcroft Transport Ltd recycling centre and
 - Landmann Way recycling centre
- 7.373** The three sites have a combined capacity for dealing with approximately 877,500 tonnes of waste ⁽¹⁹⁶⁾. SELCHP alone can handle 488,000 tonnes of waste.

7.3.4.3 Possible options

- 7.374** Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

195 Bexley, Bromley, Greenwich and Southwark

196 Southeast London Boroughs Waste Apportionment Paper (under preparation)

Option 32

Addressing Lewisham's waste requirements

The option for addressing Lewisham's waste requirements is for the borough to support the objectives of sustainable waste management and promote the waste hierarchy of prevention, reuse, recycle, energy recovery and disposal through a partnership approach. This will enable the borough to meet and exceed targets for municipal, industrial and construction waste and recycling.

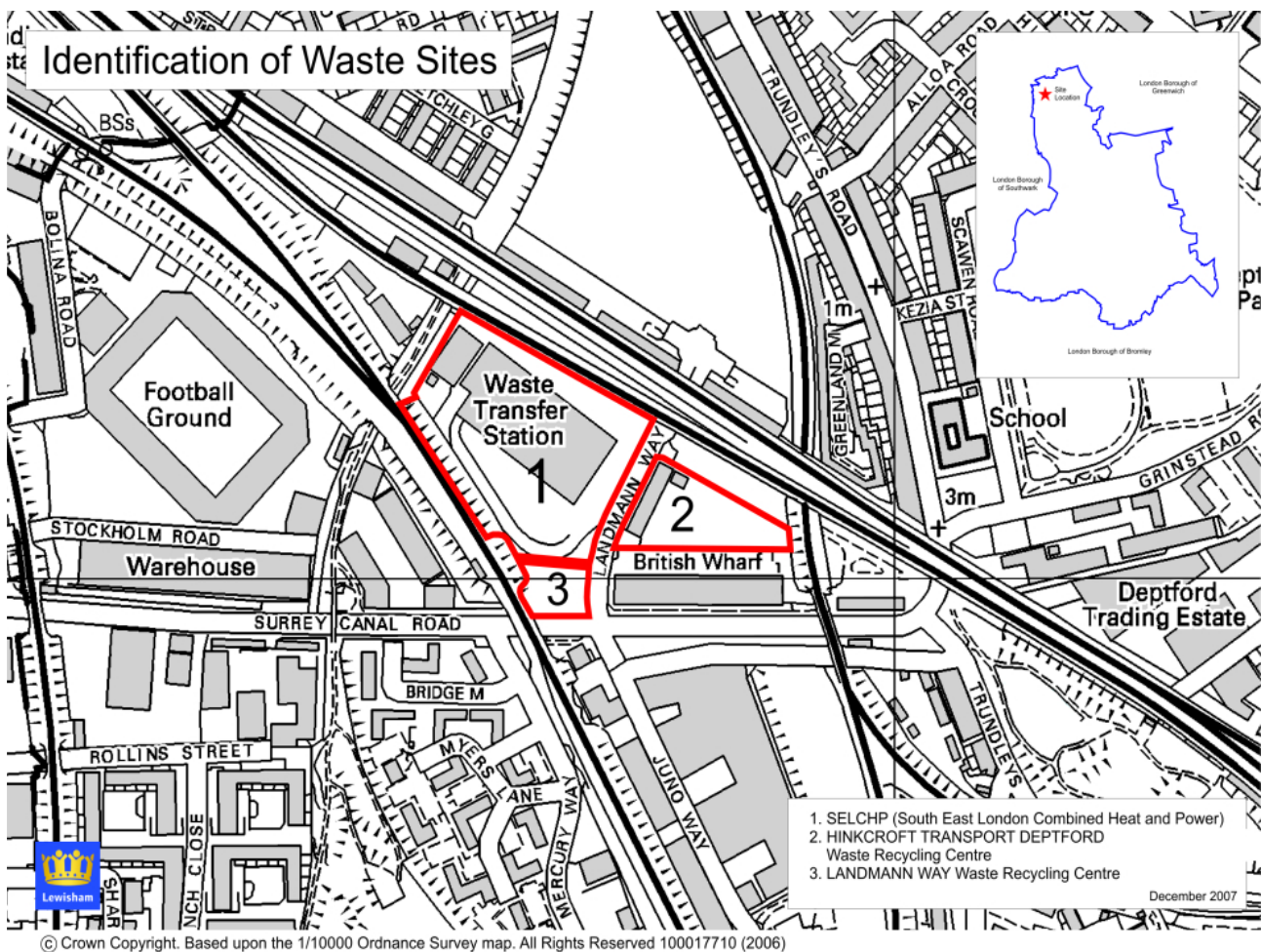
The borough would meet its allocated waste apportionment figure of 323,000 tonnes by 2020, as outlined in Table 4A.6 of the London Plan.

The waste management sites identified on Figure 7.4 at the Surrey Canal Strategic Industrial Location, including the South East London Combined Heat and Power Plant (SELCHP), Hinkcroft Transport Ltd Recycling Centre, and Landmann Way Recycling Centre, will be safeguarded for this use.

The option would provide an opportunity for all new major developments of at least 1,000 square metres or 10 dwellings to:

- submit and implement a site waste management plan (SWMP), as per the requirements of the London Plan Policy 4A.28, to minimise the disposal of wastes to landfill, by reducing waste of materials on site and promoting reuse, segregation, recycling and composting of wastes that arise
- design in a manner to incorporate the existing and future long-term needs of waste management and disposal and
- achieve recycling and reuse levels in construction, excavation and demolition waste of 95% by 2020 according to the requirements of the London Plan Policy 4A.21.

Figure 7.6 Sites allocated for the purposes of waste management



7.3.4.4 Justification for the options

Consistency with national policy and guidance

- 7.375** The option is consistent with **PPS1**. Effective waste management contributes towards the objectives of sustainable development.
- 7.376** The option is consistent with **PPS10**. The overall objective of Government policy on waste is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Through more sustainable waste management, moving the management of waste up the 'waste hierarchy' of reduction, reuse, recycling and composting, using waste as a source of energy, and only disposing as a last resort, the Government aims to break the link between economic growth and the environmental impact of waste. Adequate waste management sites also need to be provided underpinned by the Proximity Principle of disposing waste as near to its place of origin as possible. This means waste generated in Lewisham should be dealt with within the borough.
- 7.377** The option is consistent with **PPS12**. The allocation of sites for waste is considered central to the achievement of the Core Strategy.
- 7.378** The option supports the **Waste Strategy for England (2007)**. This places an emphasis on waste prevention and reuse. There is an expectation that local planning authorities will meet and exceed the landfill directive targets and secure better integration of treatment for both municipal and non-municipal waste. There is also an expectation of increasing the recycling of resources and the recovery of energy from waste.

Consistency with regional strategy and guidance

7.379 The option is consistent with **London Plan** Policy 4A.21 (Waste strategic policy and targets). This describes a staircase approach to manage waste self sufficiently within London from 75% by 2010, to 80% by 2015 and 85% by 2020. It emphasises that boroughs should ensure the availability of land resources to implement the Mayor's Municipal Waste Management Strategy, Waste Strategy 2007 and other EU directives on waste. The option supports Policy 4A.22 (Spatial policies for waste management) as waste facilities are proposed to be safeguarded, and Policy 4A.25 (Borough apportionment of municipal and commercial/industrial waste to be managed). This sets apportionment tonnages of waste for each borough to manage locally.

Consistency with the Sustainable Community Strategy and other council documents

7.380 The option supports the implementation of the **Sustainable Community Strategy (SCS)** for Lewisham to be clean, green and liveable. The SCS seeks to maximise Lewisham's contribution to a sustainable future by tackling waste and making efficient use of resources.

7.381 The option is consistent with **Lewisham's Draft Municipal Waste Management Strategy**. This sets out an action plan to deliver improved performance in the management of waste in Lewisham over the next four years in accordance with the National Waste Strategy 2000 and the Mayor of London's Municipal Waste Management Strategy.

What did the Sustainability Appraisal say?

7.382 The option scored positive impacts on waste reduction, human health, aesthetics and efficient use of natural resources. It is also noted that existing and new waste management sites should be managed properly to provide maximum benefits. A potential conflict in land uses was identified if an additional site for waste management needed to be allocated within a designated employment land area.

7.3.4.5 Alternative options

7.383 Given the priority of waste management at the European, national and regional level, it is considered that there are no reasonable alternative options to implement policy requirements. However, alternative options relate to the allocation and protection of waste sites. A new site for waste management is not required as the Southeast London Boroughs' Waste Technical Paper (prepared but awaiting government 'sign off') has shown Lewisham's existing capacity can handle the borough's waste apportionment.

7.384 The Council recognises the importance of following the guidelines set out in PPS10 and the London Plan. This and other statutory requirements associated with the need to allocate sites for waste suggest that there is no need to duplicate existing national and regional policy.

Question 50

Waste management options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 51**Waste management issues**

Are there additional issues that need consideration?

Question 52**Waste management options and alternatives**

Is there another feasible option or options having regard to the alternatives?

Question 53**Further comments**

Are there any other comments relating to waste management?

7.3.4.6 Implementation and monitoring**How would the council implement the options?**

7.385 This option would primarily be implemented by the borough to ensure effective waste minimisation, collection, recycling and recovery. However, the borough will need to work effectively with its partners, such as developers, builders and the local community, to ensure household and commercial waste recycling targets can be met. The Council's Transport, Environmental Health and Sustainability departments will need to ensure adequate waste handling is in place to lessen the environmental and transport impacts.

How would the council monitor the options?

- Residual household waste per household (NI 191)
- % of household waste sent for reuse, recycling and composting (NI 192)
- % of municipal waste to landfill (NI 193)
- % of municipal waste incinerated
- Cost of waste collection per household
- Kg of household waste collected per head
- % of household waste served by recyclable kerbside collection

Question 54**Implementation and monitoring**

- Are there other ways the Council could implement and monitor the option?

Risk assessment

- 7.386** Not managing waste properly could lead to indirect impacts on climate change. It is therefore imperative that a partnership approach is adopted to implement this option. By adopting a corporate approach, the Council will be able to regulate recycling and composting targets for municipal waste. There will also need to be education and awareness to ensure the construction industry has a positive impact on construction and demolition waste targets. If this option is not fully realised, then this could possibly lead to financial penalties. There could also be fly-tipping issues which would have a knock-on effect on the borough's aesthetics.

Signposts and evidence base

International

- The EU Landfill Directive (2006/12/EC)
- Incineration Directive (2000/76/EC)
- Packaging and Packaging Waste Directive (94/62/EC)

National

- PPS1 Delivering Sustainable Development
- PPS10 Planning for Sustainable Waste Management
- PPS12 Local Spatial Planning
- Code for Sustainable Homes
- Waste Strategy for England, 2007

Regional

- London Plan, 2008
- Mayor's Municipal Waste Management Strategy, 2007
- London Plan SPG Sustainable Design and Construction, 2006

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Southeast London Boroughs' Joint Waste Apportionment Technical Paper (draft)
- Lewisham Draft Municipal Waste Management Strategy, 2008

7.4 Building a sustainable community

7.387 This section deals with options that are necessary to secure a sustainable community. This includes:

- providing and promoting sustainable transport, including public transport, reducing the need to travel particularly by the private car and improving the walking and cycling environment
- promoting good design for buildings, places and spaces
- ensuring a range of community services and protected and provided, including health care, education and recreation and
- securing planning obligations to meet anticipated demand arising from new development.

7.4.1 Sustainable movement

7.388 The Core Strategy policy options relate to implementing strategic objective 1 by ensuring sustainable regeneration, strategic objective 4 by addressing climate change issues, strategic objective 6 by effectively using open space and environmental assets and strategic objective 8 transport.

Overview and summary of issues to be resolved

7.389 The way we travel and the travel choices available to us are fundamental contributors to the sustainability of the borough and London as a whole. Sustainable movement in Lewisham means contributing to a reduction in traffic congestion and therefore greenhouse gas emissions which, can positively impact the factors influencing climate change. This can be achieved by reducing car travel and improving accessibility through public transport, walking and cycling, particularly in those areas of the borough where accessibility is currently limited.

7.390 These measures can improve street safety and air quality and contribute to the overall health of residents. It is also crucial that major trip-generating uses are located in areas with a high Public Transport Accessibility Level (PTAL) and that major new development contributes to an improvement in a locality's accessibility.

7.391 Government guidance through PPG13 (Transport) seeks to integrate planning and transport at the national, regional, strategic and local level. Land use planning has a key role in delivering the Government's integrated transport strategy by:

- promoting more sustainable transport choices both for people and for moving freight
- promoting accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling
- reducing the need to travel, especially by car, and
- addressing the cumulative impacts of major developments on the transport infrastructure.

7.392 The London Plan, the Mayor's Transport Strategy and the Mayor's Transport 2025 Vision provide the regional context and vision for transport planning, setting out specific requirements for London's local authorities. The fundamental policy direction of the strategy is to support investment in public infrastructure and public services necessary to accommodate London's growing population and economic activity in a sustainable way. Together these documents aim to increase the capacity, reliability, efficiency, quality and integration of London's transport system. The London Plan has identified the following funded transport improvements for the borough ⁽¹⁹⁷⁾, which the Core Strategy will build on to maximise opportunities:

- East London Line Phase 1 Extension (New Cross, New Cross Gate, Brockley, Honor Oak Park, Forest Hill and Sydenham stations)
- South Eastern and Southern Railway enhancements
- London bus capacity increases
- Thameslink capacity improvements
- DLR Phase 1 capacity enhancement – Bank to Lewisham (three car capacity).

7.393 The Core Strategy needs to:

- ensure development patterns reduce the need to travel, especially by car, and focus major generators of travel demand in city, town and district centres and near to major public transport interchanges
- use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys
- protect sites and routes which could be critical in developing the infrastructure to widen transport choices for both passenger and freight movements
- require transport assessments and travel plans for major developments
- reduce congestion and make better use of streets by improving access to and within town centres; promoting and improving public transport; ensuring land is allocated for transport functions; and improving conditions for walking and cycling
- maximise the opportunities arising from transport infrastructure improvements
- improve freight movements and the distribution of goods and services.

7.394 The key transport and movement issues for the borough include:

- ensuring an integrated approach to transport planning
- improving access to basic services for all
- improving access for the many living in households without a car and
- reducing car use for those who have a car.

7.4.1.1 Previous consultation responses

Summary of the Issues and Options consultation

- 7.395** Consultation results supported higher density development where good public transport is available; requirements for a transport assessment and a (green) travel plan for certain development; and developers contributing to public transport infrastructure where deficiencies are identified. In terms of assessing accessibility, the walking distance to public transport, the cycle network, and the distance to schools were suggested as suitable criteria.
- 7.396** Network Rail noted that high density development, incorporating mixed use activities around stations, could directly (where Network Rail estate land is used) or indirectly (through Section 106 contributions) support station improvement works.
- 7.397** There was a desire to see local streets designed for local traffic and not as through roads, and for walking and cycling improvements and facilities to be considered as part of all new development in order to achieve sustainable transport. There was also a strong desire to see improvements to all forms of public transport and a need to retain the railway corridors as nature areas.
- 7.398** There was support for both retaining the current UDP car parking standards and for the adoption of the London Plan standards. Representations felt developers should also have the option of promoting car-free residential development in areas with excellent public

transport facilities. The Metropolitan Police Association requested that the Council's car parking standards recognise that the operational requirements of certain uses dictate car parking needs. This includes certain police facilities.

Summary of the Preferred Options consultation

- 7.399** The Government Office for London questioned the level of detail provided in the Core Strategy and the appropriateness of options included in the Development Policies Preferred Options report. There was a need for a robust evidence base to clearly indicate how transport infrastructure projects would be supported and delivered and who the stakeholders are. If projects could not be delivered, alternatives needed to be shown. This was reflected in Transport for London (TfL) comments encouraging preliminary work to quantify the scale of development that is realistically able to be accommodated within the existing and committed capacity.
- 7.400** The Greater London Authority thought that more explicit wording was needed to show how the borough is adopting the London Plan parking standards, requiring cycle parking, and promoting car-free development. It needed to be made explicit that parking standards are maximum or that cycle standards are a minima. The use of TfL's Cycle Guidance was recommended.
- 7.401** The Council's commitment to allow higher density development where good public transport is available (high accessibility) was supported, as well as the commitments made to encourage car free development, walking and cycling. However, the term 'accessibility' needed to be explained and accessibility to and from all stations in the borough improved.
- 7.402** Community comments related to ensuring there were better pedestrian, cycle and public transport connections from the Pepys area to Deptford and New Cross; that pedestrian and cycle connections should be made clear and obvious throughout the borough; the congestion impacts arising from vans and lorries need to be considered in the borough, and the need to ensure freight movement by other means than lorries. Concern was expressed about the amount of development that would take place in this area and the capacity of the transport network to support it.
- 7.403** Rather than adopt London Plan car parking standards, representations from developers generally thought that provision should be on a site-by-site basis as advocated in PPS3. The existing operational requirements of business and on-site parking arrangements should also be used as material considerations. It was thought that planning obligations must be directly related to the scale of the development, an assessment of provision and any needs arising as a result of development.
- 7.404** The Port of London Authority noted that the Core Strategy was not proposing a policy regarding the movement of freight to and within the borough and the promotion of the River Thames for the transportation of freight.

7.4.1.2 What does the evidence say?

Car

- 7.405** Access levels to a car in Lewisham are significantly lower than in other parts of London, with 43% of residents having no access to a car or van ⁽¹⁹⁸⁾. However, there are significant variations throughout the borough's wards, ranging from over 50% households without a car in the more deprived wards (Evelyn, New Cross) to under 33% in Catford South and Grove Park ⁽¹⁹⁹⁾.
- 7.406** The Local Implementation (Transport) Plan (LIP) does not seek to increase capacity for motor traffic, its priority instead is to increase accessibility for people on foot, cycle and bus.

Walking and cycling

- 7.407** Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips. Walking and cycling also have the potential to improve the health of the local community and can assist in reducing coronary heart disease, stroke and diabetes - three conditions which the Lewisham PCTs Annual Report ⁽²⁰⁰⁾ identifies as being significant for Lewisham's population.
- 7.408** Lewisham has a well developed and comprehensive formal network for cycling that features some high quality infrastructure, notably Waterlink Way. London Cycle Network Plus is funded by TfL and comprises most of the borough's investment planning.

Public transport

- 7.409** There are 20 mainline railway stations, three DLR stations, two London Underground stations and 42 bus routes, which provide services to Central London and Canary Wharf (major employment and leisure hubs) and connections across and through the borough to adjoining localities.
- 7.410** There are major opportunities to ensure that the transport infrastructure schemes to be delivered in the borough over the next five years and beyond contribute to accessibility improvements. This particularly relates to the extension of the East London Line, additional capacity for mainline trains through the Thameslink programme, and major station improvements at Lewisham and Deptford.
- 7.411** The rail network in the Deptford and New Cross area presents key barriers to local movement and frames some of its poorest quality urban realm. Investment is bringing some improvements, both programmed and proposed. However, no new stations are planned, and only one is proposed but uncertain, at Surrey Canal Road as part of Phase II of the East London Line extension. Delivery is dependent upon the railway being extended to Clapham Junction and on funding for building station infrastructure at this location.
- 7.412** The East London Line Extension, between New Cross and West Croydon, and Dalston Junction, is due to open in 2010. New track and heavy-rail rolling stock will be introduced. This will see station and accessibility (access for all) improvements at Sydenham, Forest Hill, Honor Oak, New Cross and New Cross Gate.

198 2001 Census, ONS

199 2001 Census, ONS

200 Lewisham PCT, Health in Lewisham 2006, Being the Annual Report of the Director of Public Health (2007)

- 7.413** In assessing the Lewisham Gateway planning application ⁽²⁰¹⁾, the Council took full account of the future capacity of and investment in public transport infrastructure and services set out in TfLs strategy 'Transport 2025'. This includes capacity enhancements to existing lines, the completion of the East London Line extension Phase II, the Thameslink programme, investment in lengthening platforms and a further 20% increase in bus capacity.
- 7.414** The publication of the Government's 2007 Rail White Paper, together with Network Rail's Route Utilisation Strategy (RUS) for South London, puts several of these initiatives on programme to be delivered. The Rail White Paper gives the full go-ahead for the Thameslink programme to rebuild Blackfriars and London Bridge stations and the operation of 24 trains an hour through the central London tunnel, including routes through Lewisham. This £5.5 billion project will be completed by 2014.
- 7.415** The Government has also approved the purchase of almost 1,000 new carriages to lengthen trains to 12 cars, and the Network Rail RUS is to propose platform lengthening and power upgrades to allow these services to operate. In particular, the draft RUS plans action to increase capacity at Lewisham by reviewing the 2009 planned service pattern to improve reliability, and retaining the current six peak trains an hour on the Hayes Line as well a general increase in train length to 12 cars. Some reconfiguration of rolling stock to increase standing capacity, albeit at the expense of seating, is also proposed. Any new rolling stock is likely to be of high capacity configuration.
- 7.416** South Eastern trains have made it clear that their agenda as an operator is to see growth of 60% in passenger journeys by 2014. Beyond this date, changeover to on-board computer signalling will allow more trains to operate.
- 7.417** For Lewisham station, the Network Rail RUS proposes actions to improve passenger capacity at the station, especially the ticket hall, and rebuilding of the steps from platforms 1 and 4 to Disability Discrimination Act (DDA) compliant standards with lifts is about to take place. Lewisham is a possible candidate for a share of the £150 million station improvement fund in the Rail White Paper and this could be the basis of a more comprehensive redevelopment of the station.
- 7.418** Work on the DLR three car upgrade has already started, increasing capacity by 25% in the peak period. Beyond this the reconfiguring of Delta Junction north of Canary Wharf will remove the current constraint on the number of trains that can be reliably operated and allow a further increase in service if needed. The constraint then would be the ordering of more vehicles. Beyond that, in the very long term, improved signalling could further increase line capacity. DLR forecasting and planning takes into account all planned housing and employment development in its area, and in the short term the Woolwich Arsenal link on the DLR will attract some users who formerly changed trains at Lewisham.

General

- 7.419** Traditional 'transport infrastructure' also plays a major biodiversity role. Many of the railway lines running through the borough are of nature conservation value and this role can be designated to ensure a level of protection. In addition, the borough's streets have many roles, including that of linear park, with front gardens providing varied habitats, trees in those gardens or planted in the footway/carriageway giving shape to the street and all adding to the general attractiveness of the street.

201 Comprising up to 100,000 sq m of retail (A1, A2, A3, A4 and A5), offices (B1), hotel (C1), residential (C3), education (D1), health (D1) and leisure (D2) with new road layout, parking, servicing, associated infrastructure and improvements to the public transport interchange, as well as open space, rivers and water features

7.4.1.3 Possible options

7.420 Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 33

Accessibility

The option is that the public transport accessibility level (PTAL) throughout the borough will influence the location and density of new housing and employment to ensure continued high accessibility and connectivity for the new resident and working populations. This would be focused in the Catford-Lewisham-Deptford-New Cross regeneration and growth corridor and builds on the borough's excellent public transport accessibility. In the Evelyn and New Cross wards, accessibility improvements should be implemented as part of new development.

Accessibility in the Perry Vale, Bellingham, Whitefoot and Downham wards in the south of the borough and the Evelyn and New Cross wards in the north of the borough would be improved through improvements to public transport services and the walking and cycling environment.

A network of connected and accessible walking and cycling routes across the borough would continue to be maintained and provided, including Waterlink Way, South-East London Green Chain, the Thames footpath, and new connections throughout the Deptford New Cross area.

Option 34

Parking requirements

The option would be that the Council would adopt a managed and restrained approach to car parking provision to contribute to the objectives of traffic reduction while protecting the operational needs of major public facilities, essential economic development and the needs of people with disabilities.

The car parking standards contained within the London Plan Policy 3C.23 and Annex 4 would be used as a basis for assessment. The application of the restraint-based parking standards within the London Plan would require a coordinated and parallel approach to the management of on-street parking supply if development and intensification are not to lead to an increase in on-street parking stress and an undermining of the effectiveness of those standards.

Car free status could only be assured when on-street parking is managed so as to prevent parking demand being displaced from the development onto the street.

It is not considered that Lewisham has any particular local distinctiveness that would require specific local standards to be adopted.

Cycle parking would be required for new development and would reflect TfL guidelines.

Option 35

Transport infrastructure improvements

The option is that the Council would work with its transport partners (Transport for London and Network Rail) to ensure the delivery of the following funded transport infrastructure and service improvements⁽²⁰²⁾:

- East London Line extension
- three car capacity for the Docklands Light Railway
- the London bus priority network
- the improvement of railway stations at Sydenham, Forest Hill, Honor Oak Park, Brockley, New Cross Gate, New Cross, Lewisham, Catford, Blackheath, Grove Park and Deptford
- capacity improvements for passengers on mainline rail services
- removal of the Lewisham roundabout and interchange improvements
- removal of the Kender triangle gyratory and implementation of the 'Streets for People' scheme .

202 As identified in Table 3C.1 of the London Plan

Option 36

Freight

The option for freight is that the use of the River Thames and the borough's Strategic Routes (Transport for London road network) would be supported as freight transport corridors.

7.4.1.4 Justification for the options

Consistency with national policy and guidance

7.421 The Government's transport considerations are primarily contained in **PPG13**. The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level. The options are consistent with PPS13 as they:

- promote more sustainable transport choices through walking, cycling and public transport
- focus on reducing the need to travel by locating jobs, health care, education and other services together
- promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling
- address the cumulative impacts of major developments on the transport infrastructure
- adopt a restricted approach on parking to aid the promotion of sustainable transport and
- ensure all new and existing developments of a certain size have travel plans.

7.422 The suggested approach also supports other Government policy and guidance through:

- **PPS1** and the principle of integrating climate change considerations into all areas of spatial planning concerns, including transport
- **PPS3**, which seeks to take a design-led approach to the provision of car-parking space that is well integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly and
- **PPS6**, which seeks to ensure that local authorities have regard to the accessibility of town centres, especially through public transport, walking and cycling, and that everyone has access to a range of facilities.

Consistency with regional policy and guidance

7.423 **London Plan** policies which support the options include 3C.9 (Increasing the capacity, quality and integration of public transport to meet London's needs), 3C.11 (Phasing of transport infrastructure), 3C.12 (New cross-London links within an enhanced London National Rail network), 3C.13 (Improved Underground and DLR services), 3C.14 (Enhanced bus priority, tram and bus transit schemes), 3C.16 (Road scheme proposals), 3C.17 (Tackling congestion and reducing road traffic), 3C.18 Allocation of street space, 3C.19 (Land transport and public realm enhancements), 3C.20 (Improving conditions for buses), 3C.21 (Improving conditions for walking), 3C.22 (Improving conditions for cycling), 3C.23 (Parking strategy), 3C.25 (Freight strategy), 4A.19 (Improving air quality).

- 7.424** Like all other London local authorities and Transport for London (TfL), the Council has a duty placed on it ⁽²⁰³⁾ to secure the expeditious movement of traffic so far as may be reasonably practicable having regard to its other obligations, policies and objectives. Locational and other policies within the Core Strategy, allied to the London Plan parking standards applied as part of a comprehensive approach to the management of parking supply, will be a major means of delivering this objective.
- 7.425** The London Plan also sets out the major transport schemes and developments supported by the Mayor. The options reflect that the Council considers early promotion of transport improvements to be worthwhile, while acknowledging that the money and authority to implement these schemes does not lie with the Council: specifically the funded East London Line extension (Phase I), DLR capacity improvements and a programme for a 40% increase in additional capacity to Network Rail services.
- 7.426** The **Mayor's Transport Strategy** provides the regional context for transport planning, setting out specific requirements for local authorities. The suggested approach supports the fundamental policy direction of the Strategy, the investment in public infrastructure and public services necessary to accommodate London's growing population and economic activity in a sustainable way. The Strategy also seeks to increase the capacity, reliability, efficiency, quality and integration of London's transport system. The options also support and reflect the Mayor's document 'Transport 2025: Transport vision for a growing world city'.
- 7.427** The options support **TfLs Business Plan 2005/9 to 2009/10**. Of considerable note is the extension of the East London Line (ELLX) to provide connections to the South London Line near the Old Kent Road and the Croydon line in the vicinity of New Cross Gate Station. The East London Line extension will bring substantial benefits, including greater cross river capacity, relieving busy overland railways and roads, with scope and potential for further services, journey time savings and strong regeneration benefits.
- 7.428** The options support the implementation of the **London Bus Priority Network**, accessibility improvements at bus stops, promoting new bus service links and public transport improvements arising from new developments.
- 7.429** The **Mayor's Best Practice Guidance Health Issues in Planning**, provides key healthy outcomes for transport issues, with a focus on encouraging walking and cycling. The options support the healthy outcomes for increased fitness, reduced risk of cardiovascular disease, reduced levels of air pollution and CO₂ emissions, reduced noise and improved mental health.
- 7.430** The options support the implementation of the **London Development Agency's Economic Development Plan**. This relates to the economic growth objective to modernise London's infrastructure, which encompasses transport. Action 1.4.3 seeks the renewal of London's internal urban transit network and investment in new capacity.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.431** The options support the implementation of the **Sustainable Community Strategy**, which seeks to improve access to sustainable modes of transport and connections to London and beyond.
- 7.432** The **Lewisham Local Implementation Plan (LIP)** is the borough's statutory transport plan to implement the London Mayor's Transport Strategy and provides the details on projects, proposals and programmes through to 2011. The options are aimed at supporting and delivering the measures set out within the LIP and reflect the specific LIP targets for transport

203 Traffic Management Act, 2004

over the next five years. The actions set out in the LIP are supportive of implementing a sustainable transport strategy, particularly with regard to the location of new development, traffic management and car parking control, improvements to the physical environment of town centres, and the promotion of walking and cycling.

- 7.433** The options support the **Deptford and New Cross Transport Report** (2008), prepared for the Council by Urban Initiatives. This report outlines potential impact of development in this area and identifies investment priorities to maximise accessibility and ensure a safer and more welcoming environment.
- 7.434** The options support the **Deptford and New Cross Transport Report** (2008), prepared for the Council by Urban Initiatives. This outlines the potential impacts of development in the area and recommends investment priorities to improve accessibility.
- 7.435** The options support the **Air Quality Action Plan** to deliver improved air quality within the borough. The focus is to reduce 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.

Consistency with other plans and strategies

- 7.436** The Council signed up to the **Public Service Agreement** (PSA) in March 2001 which aims by 2010 to reduce by at least 10% the gap between the 20% of areas with the lowest life expectancy and the population as a whole. One of many ways this could occur would be through walking and cycling. These two options are firstly inexpensive and easy to implement, which would allow most residents to take them up. Secondly, they contribute to creating a sustainable community and reducing local pollution. The Council currently has numerous designations within the borough which provide scenic spaces in which to walk and cycle, and developers are encouraged to seek out sustainable modes of transport and the appropriate infrastructure to promote their use.

What did the Sustainability Appraisal say?

- 7.437** The Sustainability Appraisal (SA) identified that the use of the private vehicle can be reduced through a range of measures (most notably supporting public transport and walking and cycling) to impact positively on economic, transport, air quality, health and climate change objectives. Where appropriate this could also be achieved through the use of travel plans.
- 7.438** Accessibility can be improved by allowing higher density development where there is good public transport, and through the provision and promotion of walking and cycling opportunities.
- 7.439** Issues relating to flood risk will need to be identified and mitigation measures related to ensuring infrastructure design makes a positive contribution to the landscape and townscape and reflects safer by design standards. The use of transport corridors as nature corridors would have a positive impact on biodiversity.

7.4.1.5 Alternative options

- 7.440** Alternative options considered retaining current UDP car parking standards or introducing other car parking standards. These options are not being carried forward as the Council needs to be in conformity with the standards contained in the London Plan. These standards seek to moderate car parking provision, which scores well with environmental objectives in the Sustainability Appraisal.

- 7.441** Detailed options were previously considered covering issues relating to Controlled Parking Zones (CPZs), the road hierarchy, traffic management and travel plans. These options are not being carried forward as these issues are not a matter for the Core Strategy, are covered in national or regional policy or are not implemented through the development management process.
- 7.442** On the issue of cycle parking, an alternative option considered the Council adopting its own cycle parking standards or negotiating provision on an individual basis. These options are not being carried forward as they ranked lower in the Sustainability Appraisal and were not supported in previous rounds of consultation.

Question 55

Sustainable movement options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 56

Sustainable movement issues

Are there any additional issues that need consideration?

Question 57

Sustainable movement options and alternatives

Is there another feasible option or options having regard to the alternatives?

Question 58

Further comments

Are there any other comments relating to sustainable movement?

7.4.1.6 Implementation and monitoring

How would the Council implement the options?

- The Local Implementation Plan (LIP), which includes, but is not limited to:
 - pursuing 'Legible Lewisham' and 'Deptford Links' programmes to improve walking and cycling links within and around Deptford and New Cross by 2012

- removing the gyratory system at Kender Triangle and reinstating two-way traffic at Queens Road and New Cross Road by 2011
 - removing Lewisham roundabout and creating an 'h' shaped street layout to rationalise the traffic movement and provide simple and safe pedestrian access directly from the station to the high street by 2011
 - relocating the South Circular at Catford to allow revitalisation of the town centre
 - ten year road and pavement renewal programme
 - preparing school travel plans for all schools
 - completion of TfLs London Cycle Network Plus by 2010
 - adopting 20 mph zones and other local road safety projects to reduce casualties and encourage walking and cycling
- Working with Transport for London (TfL) to increase the capacity of the DLR to three carriages by 2009 and deliver the East London Line extension with improved stations at Sydenham, Forest Hill, Honor Oak Park, Brockley, New Cross Gate and New Cross by 2010
- Working with partners including Transport for London, National Rail, Southern and South Eastern trains to:
 - improve access and ensure compliance with the Disability Discrimination Act for stations at Lewisham, Blackheath, New Cross Gate, Forest Hill, Grove Park and New Cross by 2009 and
 - provide a 25% capacity increase over the period 2006 to 2025 through lengthening trains and platforms
- Replacing Deptford Station and making improvements to the listed carriage ramp to provide a safer, more accessible and more welcoming environment by 2011
 - Preparing and implementing a Supplementary Planning Document for development contributions which will include transport issues
 - Negotiating with developers to ensure transport improvements and travel plans are secured through Section 106 agreements. The work of the Deptford and New Cross Transport Report will be used to prioritise investment in this area.
 - The Air Quality Action Plan which promotes traffic reduction, greater use of alternative fuels and technology to reduce emissions from various sources including motor vehicles, and greater use of public transport and other 'cleaner' modes
 - The Lewisham Cycling Strategy, including improvements to the borough's cycle network
 - The promotion of walking through the Lewisham Local Walking Strategy and its partnership with the Primary Care Trust and 'Lewisham Healthy Walks' within the Lewisham Walking Forum (the Walking Forum is featured within the London Mayor's Walking Plan along with its annual walking festival)
 - The funding of the 'Freedom Pass' providing free public transport travel for elderly and disabled people and the funding of the Taxicard and the Capital Call (minicab based) service providing subsidised travel for people with disabilities
 - Adopting the London Plan car parking standards to reflect the restraint objective and not attempting to meet full demand

How would the Council monitor the options?

- Changes in the PTAL throughout the borough
- The number of journeys made by train and bus throughout the borough
- The provision and improvement of public transport services and facilities resulting from planning obligations
- Working with TfL on the strategic highway capacity to ensure mitigation proposals in transport assessments and travel plan initiatives are relevant and necessary

Question 59

Implementation and monitoring

- Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.443** There are risks that national or regional funding for infrastructure projects could be reduced or withdrawn. However, these are considered to be low as the key projects for the borough are identified in existing business plans, have been allocated funding, and in many instances are underway and due for completion by 2010 or thereabouts. The exception is Phase II of the East London Line extension, where the Council will need to actively lobby to ensure funding and implementation. This would impact on future accessibility within the vicinity of the proposed Surrey Canal Road station.
- 7.444** Transport issues could be given a low priority when negotiating planning obligations. The preparation of a Supplementary Planning Document for Planning Obligations will provide clear guidance on this issue. There is also a risk that on-site car parking provision could exceed standards and meet demand. This is considered low, and clear justification from an applicant would need to be provided on a case-by case basis for this to occur.

Signposts and evidence base

National

- Planning and Climate Change (Supplement to PPS1), December 2007
- PPS3 Housing
- PPS6 Planning for Town Centres
- PPG13 Transport
- Guide on Transport Assessment, Communities and Local Government and Department of Transport, March 2007

Regional

- London Plan, 2008
- Transport vision for a growing world city, November 2006
- London Freight Plan, 2007
- Transport Strategy, 2001
- Health Issues in Planning, Best Practice Guidance, 2007
- London Plan SPG Land for Transport Functions, 2007

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Lewisham Local Implementation (Transport) Plan, 2006
- North Lewisham Links Strategy, 2007
- Deptford and New Cross Transport Report, 2009
- Ravensbourne River Corridor Improvement Plan (currently under preparation)

7.4.2 Promoting good design

7.445 The Core Strategy policy options relate to implementing strategic objective 1 by ensuring sustainable regeneration, strategic objective 9 by improving safety and strategic objective 11 by protecting and enhancing Lewisham's character.

Overview and summary of issues to be resolved

7.446 High quality, well designed new development is a key factor that will contribute to the long-term sustainability of communities in Lewisham. In order to be successful new development must meet the qualities required by national and regional policy and guidance and also reflect and be sympathetic to the local physical and social characteristics of the borough.

7.447 The Government, specifically through PPS1 (Sustainable Development) and PPS3 (Housing), has a strong focus on ensuring good quality design but does not specify particular styles unless in special circumstances. Design must lead to sustainable places.

7.448 PPG15 (Planning and the Historic Environment) provides the national interpretation of the Town and Country Planning Acts for Conservation Areas, Listed Buildings, Locally Listed Buildings and other local features such as boundary markers and water troughs, and archaeological remains.

7.449 The London Plan has policies on a range of design issues including compact city, density, tall buildings, strategic views, the River Thames, and accessibility to buildings. We need to determine how we include a locally distinctive element to design while using existing national and regional policies already in existence.

7.450 The Core Strategy needs to:

- ensure development adds to the vitality and viability of local communities by creating a sense of place and linking into or improving the street network
- ensure development patterns meet the aims of the compact city by ensuring appropriate densities to context
- focus on providing high quality sustainable design including inclusive and accessible environments, and integrate safer by design principles
- conserve the historic environment
- ensure development addresses the river networks and the River Thames and protects flood defences
- ensure new development manages flood risk and preserves flood defences
- manage strategic and local views and panoramas
- ensure development is responsive to the character and scale of the local context.

7.451 It should be noted that Sustainable Design and Construction is dealt with in the Climate Change chapter of the Core Strategy. The Core Strategy policy areas proposed to be covered include:

- improving design for Lewisham
- conserving Lewisham's historic environment
- location for tall buildings
- strategic and local views and panoramas
- lewisham's river and waterways network.

7.4.2.1 Previous consultation responses

Summary of the Issues and Options consultation

7.452 Consultation responses considered that much of the content of these policies was laid out in Government guidance, the Town and Country Planning Acts and the London Plan. Comments concerned matters of detail, wording and emphasis, and were most often supportive of the Council's aspirations for good design.

Summary of the Preferred Options consultation

7.453 This approach was continued in the consultation for the Preferred Options for the Core Strategy and the Development Policies and Site Allocations Development Plan Documents. Comments were supportive of the broad outline of the Preferred Options.

7.454 Specific comments were made in relation to designating Areas of Special Character, and a proposal for high density development in the Thames Policy Area. The GLA made specific comments on the conformity of policies to the London Plan. In particular Draft Policy U1 Development Sites was considered to be confusing and repetitive of the London Plan. Concern was expressed that new development at Lewisham Town Centre should take account of and enhance the area's unique physical characteristics.

7.455 Crime and the fear of crime were major concerns for some communities which discouraged the use of local facilities.

7.4.2.2 What does the evidence say?

7.456 Lewisham has distinctive topographical characteristics. Developers need to consider these physical features and how their development will meet these local circumstances and the general aims for good design. Key characteristics include:

- The Ravensbourne Valley passes from north to south through the borough surrounded by low hills topped with open spaces which provide a framework of local views and panoramas which will continue to be protected.
- The Major Town Centres of Lewisham and Catford are located in this valley where major development is proposed.
- Lewisham Gateway is sited on the confluence of the rivers Ravensbourne and Quaggy, which should be enhanced in development proposals
- The Sydenham Ridge forms the south-western boundary of the borough and is visible from within the borough. It forms a wooded skyline feature that the Council would wish to preserve.
- Most of the borough south of the A2 is suburban in character comprising well integrated areas of mostly good quality residential development of varying styles, age and character.
- The northern part of the borough north of the A2 is flat and horizons are narrower.
- Large areas of the borough are designated as Conservation Areas.
- A framework of local landmark buildings has been identified which add character and interest to the skyline of the borough.

7.457 The Council has 26 Conservation Areas. There have been 10 Character Appraisals and two Supplementary Planning Documents prepared covering Hatcham and Brockley Conservation Areas. These provide a sound basis for ensuring design is locally distinctive. A general Supplementary Planning Document on Conservation Areas is currently under preparation.

7.4.2.3 Possible options

- 7.458** Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 37

Improving design for Lewisham

The option for the overall design and density of development is that the Council would seek to achieve the aims of national and regional guidance in seeking good design and the protection or enhancement of the historic environment, which is sustainable, accessible to all, maximises the potential of sites and is sensitive to the local context. Design should also act to reduce crime and the fear of crime.

Where new development occurs it will be at densities outlined in the London Plan at Policy 3A.3, except where this is not appropriate to preserving or enhancing the characteristics of Conservation Areas.

'Central' density levels will be achievable within the Lewisham Major Town Centre. Developments in Catford Town Centre will be at 'urban' density levels. These sites present opportunities to create new developments that have the potential to transform the face of these areas and result in a radical upgrading of the environment both socially and physically. These new projects, in order to be successful will need to allow for tall buildings where they improve and add coherence to the skyline, and where their impact is judged to be acceptable, and of the highest design quality.

In the Deptford New Cross area urban design policy will aim to establish visual links with the Thames, increase the connectivity of the street network, improve the streetscape, and provide a more varied and structured skyline to aid orientation and create a sense of place.

The Spatial Options in Section 6 identified the **Regeneration and Growth Corridor, District Centres, Activity Hubs, Local Hubs, and Areas of Stability and Managed Change**. In each area the design of new development must meet various challenges, determined to a large extent by its context, size and purpose. These identified areas have many varied characteristics, including small town centres of traditional form and appearance, modern housing estates, relatively closely packed Victorian or Edwardian housing and more expansive suburban style layouts with detached or semi-detached housing and larger gardens.

In these areas development is expected to be more piecemeal and less intensive than in other parts of the borough, and the challenge will be to accommodate new development that fits in with the local context and to preserve or enhance its character.

The Council will use Building for Life standards to assess major planning applications to ensure design quality in new housing schemes.

In addition to the above issues, sustainable design and construction and energy efficiency, as detailed in Option 23, and managing and mitigating the risk of flooding (particularly the provision of living roofs) as detailed in Option 24, will need to be considered as part of the overall design process.

Option 38

Conserving Lewisham's historic environment

The option is that the historic environment, including conservation areas, listed buildings and locally listed buildings and archaeological remains, will continue to be monitored and protected according to the requirements of PPG15 and London Plan policies 4B.12 to 4B.16.

Option 39

The location for tall buildings

The option is that the Council considers that tall buildings (i.e. buildings that are considerably taller than the surrounding built development) are best directed to existing clusters of tall buildings and close to centres of good public transport – Lewisham and Catford Town Centres.

Tall buildings elsewhere in the borough will be assessed as to whether their development meets the aims identified for the Core Strategy Policy Areas, for their impact on the character of identified heritage and open space features, and for their regeneration benefits.

The Council has identified several areas where the effect of tall buildings will require careful assessment in relation to potential harm to the identified qualities of the areas listed below:

- World Heritage Sites of Maritime Greenwich and the World Heritage Site Buffer Zone
- London Panoramas as defined in the London Plan and Local Views
- Conservation Areas and their settings
- Metropolitan Open Land and other open spaces including London Squares
- Historic Parks and Gardens
- Listed Buildings and their settings
- Sydenham Ridge Area of Special Character, which comprises a topographical feature where tall or bulky buildings would affect the skyline and have an adverse effect on the landscape and on local residential amenity
- Riverside environments where tall buildings might harm biodiversity interests through overshadowing.

The Council will use the guidelines issued by the Commission for Architecture and the Built Environment (CABE) when considering proposals for tall buildings ⁽²⁰⁴⁾.

Option 40

Strategic and local views, landmarks and panoramas

The option is that strategic and local views, landmarks and panoramas will be managed in accordance with strategic and local guidelines, specifically the London Plan Policies 4B.16 and the London Plan Supplementary Planning Guidance London View Management Framework.

204 Guidance on Tall Buildings, CABE, July 2007

Option 41

Lewisham's river and waterways network

Thames Policy Area, Deptford Creek and the Ravensbourne River Network

The option is that the Council would define a Thames Policy Area in order to ensure that a wide area of the flood plain is considered in terms of ensuring that development addresses the River Thames by increasing connectivity and visual links to the river.

7.4.2.4 Justification for the options

Consistency with national policy and guidance

- 7.459** The options support **PPS1**, which states that design which fails to take opportunities to improve the character and quality of an area should not be accepted. Policies should not seek to impose particular architectural styles and should not stifle original design based on unsubstantiated requirements. On the other hand, it is proper to seek to promote or reinforce local distinctiveness when supported by clear plan policies or supplementary planning documents.
- 7.460** New development should be of high quality design and have an inclusive layout. The opportunity should be taken to improve the character and quality of an area. Development plans should contain clear, comprehensive and inclusive access policies that consider people's diverse needs and aim to break down unnecessary barriers and exclusions to benefit the entire community.
- 7.461** The options support **PPS 3**. This states that the planning system should deliver high quality housing that is well designed and complements the neighbouring buildings and the local area in terms of scale, density, layout and access.
- 7.462** The options support **PPG 15** and the **Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990**. This guidance and statute provide the basis for the Council's stance on protecting Conservation Areas and Listed Buildings.
- 7.463** The options support **PPS12**. Paragraphs 4.30 to 4.33 state that the core strategy should not repeat or reformulate national or regional policy. If it is the intention of the local planning authority simply to apply national and regional policy in its decision making, it does not need to reiterate it in DPDs in order to do so, nor reformulate it by devising a similar kind of wording which achieves the same result. There may be local reasons and circumstances which suggest that a local interpretation of higher level policy is appropriate but this should be justified by sound evidence of local circumstances.

Consistency with regional strategy and guidance

- 7.464** The options support the **London Plan** aims for design, accessibility, safety by design, tall buildings, the management of local distinctiveness, the river networks, built heritage and heritage conservation. Specific policies include Policies 3A.3 (Maximising the potential of sites and Table 3A.2 Density Matrix (habitable rooms and dwellings per hectare)), 4A.12 (Flooding), 4A.13 (Flood risk management), 4A.14 (Sustainable drainage), 4B.1 (Design), 4B.3 (Enhancing the quality of the public realm), 4B.5 (Creating an inclusive environment), 4B.6 (Safety, security and fire prevention and protection), 3A.17 (Addressing the needs of

London's diverse population), 4B.8 (Respect local context and communities), 4B.9 (Tall Buildings – location), 4B.10 (Large-scale buildings – design and impact), 4B.11 (London's built heritage), 4B.12 (Heritage conservation), 4B.13 (Historic conservation-led regeneration), 4B.14 (World Heritage Sites), 4B.15 (Archaeology), 4B.16 (London View Management Framework), 4B.17 (View management plans), 4B.18 (Assessing development impact on designated views), 4C.14 (Structures over and into the Blue Ribbon Network), 4C.15 (Safety on and near to the Blue Ribbon Network), 4C.17 (Thames Policy Area) and 4C.18 (Appraisals of the Thames Policy Area).

- 7.465** The options support the **London Plan SPG View Management Framework** for managing strategic views and panoramas.
- 7.466** The options support the London Plan Thames Policy Area. The Council participated in the formulation of the **Thames Strategy East Document**, which sets the boundary for this policy area.

Consistency with the Sustainable Community Strategy and other Council documents

- 7.467** The options support the implementation of the **Sustainable Community Strategy** for Lewisham to be 'clean, green and liveable', and safe, by ensuring that housing is of a high quality design and that new developments are planned and developed in a sustainable manner. The SCS identifies the Deptford New Cross area, Lewisham Gateway (Lewisham Town Centre) and Catford Town Centre as areas for regeneration.
- 7.468** The options support the Council's **Regeneration Strategy**, which has the aim of providing a high quality of life for all residents through attractive, liveable, accessible and safe neighbourhoods, along with the provision of high quality facilities and town centres that meet the needs of the community.
- 7.469** The options support the **Lewisham Local Cultural Strategy**, which highlights the way in which the urban landscape can influence people's perceptions and behaviour. Innovative improvements to the streetscape and the quality of urban design can bring real benefits in terms of access and safety. Lewisham is one of London's greenest boroughs and the care and management of both the built historic environment and its natural heritage and ecology are among the Council's highest cultural priorities.
- 7.470** The options support the **Deptford New Cross Masterplan**. This document examines the possibilities for development on several large industrial sites. The study examines the sites in their physical context, including their location on the flood plain, connectivity and the street network, the quality of the overall environment and the quality of the existing built development, and proposes indicative urban design solutions for the sites with an estimate of the numbers of new jobs and dwellings that could be created. It concludes that this area suffers from environmental degradation, the street network is fragmented and in some places almost severed by the railway viaducts that cross the area. The area lacks landmarks and is inward looking. There are few defined centres and associated community facilities are lacking. The masterplan proposes that high quality mixed use development of a number of these sites could remedy many of these deficiencies and lead to a step change in the environmental and social quality of this area.
- 7.471** The options support the implementation of the Council's conservation area SPDs, management plans and character appraisals.

What did the Sustainability Appraisal say?

- 7.472** Generally positive effects were recorded on the physical and in some cases the social environment by the policies leading to regeneration and sustainable communities. Slightly negative economic effects were recorded where some policies restricted development (e.g. in the case of the protection of Strategic and Local Views). However, these were outweighed by the positive effect on the environment as a whole, by the protection afforded by the suggested approach. Negative effects were recorded on the physical environment, e.g. use of water resources by high density residential development.
- 7.473** The SA recommended that every opportunity to install living roofs and walls should be taken in order to reduce the impact the built development has on the natural environment and to improve biodiversity. Green roofs and walls will also contribute to energy conservation, amelioration of the effects of climate change and sustainable urban drainage by reducing flood risk through reducing water run-off.
- 7.474** The design of tall buildings should be subject to a risk appraisal including the effects of high winds on the structure and at ground level. Wind turbulence is considered in guidance issued by CABI on tall buildings.

7.4.2.5 Alternative options

- 7.475** The options contained in this document have been extensively reconfigured in the context of the greater clarity of the types of spatial policy that should be included in a core strategy. In particular it has been made clear by Government that policies in the core strategy should not repeat those contained in national and regional policies.
- 7.476** Given this it is not considered that there are alternative options other than the promotion of good design through the implementation of national and regional policy and guidance. However, it is considered that broad design policies should be set out.
- 7.477** The Council has identified various elements that are locally distinctive in Lewisham's built environment and in its landscape. Government guidance states that these elements should be identified and supported.

Question 60

Promoting good design options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 61

Promoting good design issues

Are there any additional issues that need consideration?

Question 62

Promoting good design options and alternatives

Is there another feasible option or options having regard to the alternatives?

Question 63

Further comments

Are there any other comments relating to promoting good design?

7.4.2.6 Implementation and monitoring

How would the Council implement the options?

- Application of national and regional policy and guidance as it relates to design and reflected through PPS, PPG, the London Plan and SPG to the London Plan where applicable
- Use of the Conservation Area Supplementary Planning Documents and Character Appraisals
- Preparing and implementing the following local development documents:
 - a Development Plan Document for Site Allocations by 2011
 - an Area Action Plan for Lewisham Town Centre by 2011
 - an Area Action Plan for Catford Town Centre by 2011
 - a Supplementary Planning Document, prepared jointly with the London Borough of Greenwich, for the Deptford/Greenwich Riverside London Plan Opportunity Area by 2010

How would the Council monitor the options?

- Number of schemes achieving gold or silver standard Building for Life assessments
- Number of schemes referred to the Council's Design and Conservation Panel
- Number of conservation areas with character appraisals and published management plans
- Number of applications within Areas of Archaeological Priority requiring Archaeological Assessments
- Number of applications for Listed Building Consent and planning permissions in Conservation Areas approved or refused
- Number of Listed Buildings removed from the Listed Buildings at Risk register

Question 64

Implementation and monitoring

Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.478** The economic downturn could adversely affect the viability of the major development of sites in Deptford and New Cross and the Lewisham and Catford Town Centres. This would mean that the urban design and regeneration objectives for the borough would not be delivered. The economic downturn could also affect the quality of development put forward for planning approval. However, given the requirements contained in national and regional policy and guidance, there would be clear reasons to reject poor design.

Signposts and evidence base

National

- PPS1 Delivering Sustainable Development
- PPS3 Housing
- PPS12 Creating Strong Safe and Prosperous Communities through Local Spatial Planning
- PPG15 Planning and the Historic Environment
- PPG16 Archaeology and Planning
- PPS25 Development and Flood Risk
- London Square Act, 1932
- Various design guidelines issued by CABE

Regional

- London Plan, 2008
- London Plan SPG View Management Framework, 2007
- London Plan SPG Tall Buildings, 2007
- Thames Strategy East, 2008

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Residential Development Standards Supplementary Planning Document, 2006
- Deptford New Cross Masterplan, 2007
- People, Prosperity, Place: Lewisham Regeneration Strategy 2008-2020
- Lewisham Local Cultural Strategy, 2002
- Conservation Area Appraisals and Management Plans
- Locally Listed Buildings

7.4.3 Community services

7.479 The Core Strategy policy options relate to implementing strategic objective 1 by contributing to regeneration, strategic objective 9 by improving safety and strategic objective 11 by ensuring the provision of suitable social infrastructure.

Overview and summary of issues to be resolved

7.480 The Council wishes to ensure a thriving environment in which people can live, work and learn. Sustainable communities can only exist where a network of appropriately located facilities is provided. Education and health facilities are the essential basic services to achieve this and are supplemented through other community, leisure, arts, cultural, entertainment and emergency services, and sports and recreational facilities.

7.481 Lewisham already has many practical strategies to tackle social exclusion and has been at the forefront of national initiatives such as Neighbourhood Renewal and Sure Start. Lewisham's activity has not only been a response to national strategies; the Council has used its knowledge about the needs of its communities to design services to address those needs.

7.482 The anticipated growth in population and subsequent need to provide additional housing will place increased pressure on the provision of existing services and infrastructure. This has led to the requirement for a partnership approach among various stakeholders such as the Lewisham Strategic Partnership (LSP), the Lewisham Primary Care Trust (PCT), the Healthy Urban Development Unit (HUDU), and the Local Educational Authority to plan for the provision of social infrastructure facilities in the borough as recommended by each organisation's corporate plan and the Council's Social Infrastructure Framework (SIF) Working Paper⁽²⁰⁵⁾.

7.483 The Government through PPS1 requires the Core Strategy to promote development that creates socially inclusive communities. In particular the Council needs to ensure the social impacts of development are considered and taken into account and social inequalities are reduced⁽²⁰⁶⁾.

7.484 PPS12 requires the Core Strategy to be supported by evidence of what infrastructure is needed to support the amount and location of development proposed. This includes social infrastructure such as health, education and the myriad of community facilities and services provided across the borough. The infrastructure implications for the Core Strategy were discussed in section 6. The provision of such facilities further supports the delivery of strong, vibrant and sustainable communities as advocated by PPS1⁽²⁰⁷⁾ to promote community cohesion.

7.485 The London Plan Policy 3A.18 requires boroughs through the policies in DPDs to assess the need for social infrastructure and community facilities and ensure that they are capable of being met wherever possible. Adequate provision for these facilities is particularly important in major areas of new development and regeneration. They should be provided within easy reach by walking and public transport. The net loss of such facilities must be resisted and increased provision sought, both to deal with the increased population and to meet existing deficiencies.

205 The SIF model produced by EDAW and sponsored by HUDU and London Thames Gateway, has been prepared to act as an evidence base to inform the preparation of the Lewisham Core Strategy

206 PPS1, paragraph 16

207 PPS12, paragraph 14

- 7.486** In terms of education, a number of national programmes are changing the way in which new schools are run and enhancing the role of all schools in local communities. The Core Strategy has to consider the provision of new schools and the enhanced role of existing schools (particularly secondary schools) in providing extended services to the community such as ICT, clubs, sports facilities and extra tuition. The Core Strategy seeks to provide a positive policy framework to enable the borough to excel at all levels in educational provision and achievement.
- 7.487** The Core Strategy will need to facilitate positive improvements to Lewisham's health and well being. In the context of spatial planning this definition widens the scope for the planning system to influence health. The role of planning is not limited to the provision of health facilities. It has been expanded to ensure that the design of new development takes account of issues such as enabling walking and cycling, the provision of formal and informal community meeting spaces and of sports facilities and green spaces, providing local shops, reducing the fear of crime and the promotion of mental well-being.
- 7.488** Health is far more than the absence of illness, rather it is a state of physical, mental and social well-being. A person's health is therefore not only linked to age and gender but also to wider factors such as education, employment, housing, social networks, air and water quality, access to affordable nutritious food, and access to social and public services in addition to health care ⁽²⁰⁸⁾. It is about lifestyle: physical exercise, improved diet, cleaner air, and mental well-being through stress reduction, engagement and socialisation.
- 7.489** Nationally and locally there is a drive to increase participation in physical and social activity and to encourage improvements in health and well-being. Sport England has an ambition to get two million people more active in sport by 2012 and to make sure that the participation is sustained. The role of spatial planning here is to provide the opportunities for people to live healthy lifestyles and improve well-being. This is as important to older people as it is to the young.
- 7.490** The Core Strategy areas proposed to be covered include:
- providing a range of community and recreational facilities
 - facilitating the provision of appropriate health and education facilities
 - resisting the loss of such facilities.

7.4.3.1 Previous consultation responses

Summary of the Issues and Options consultation

- 7.491** There was general support for the options put forward. It was noted that community facilities should include those offered by the voluntary and community sector. Accessibility to services and facilities was a recurring theme. Funding was also critical as this seems to be decreasing each year. There was agreement that planning obligations should be used to ensure the needs arising from a development are provided but any contribution collected had to be used in the vicinity of the development taking place.
- 7.492** Requirements for a social impact assessment for major development were supported. However, the Council would need to ensure it acted on the results of any assessment and considered cumulative impacts. There was overwhelming support for the Council to protect existing facilities from development unless they can be provided elsewhere or it was shown there was no longer a local need.

208 London Plan definition

Summary of the Preferred Options consultation

- 7.493** There were concerns over where facilities in the borough would be provided and how this would be implemented. Community representations noted that such facilities should be sufficiently and substantially provided for. The loss of facilities should be resisted unless it can be demonstrated that they are no longer required or could be rebuilt elsewhere in a more accessible location. Issues of cumulative impact on local infrastructure needed to be addressed.
- 7.494** The Greater London Authority supported the options and noted the policy should target provision of new facilities in areas within easy reach by walking and public transport of the people that will use them.
- 7.495** A consultant acting on behalf of the Metropolitan Police suggested that ‘police facilities’ should be added to the list of community and social infrastructure facilities. There was also overwhelming support for resisting the loss of any existing facility, especially when redevelopment was proposed.
- 7.496** Goldsmiths College supported any approach that enabled it to deliver a high standard of education. It was noted that Goldsmiths has been heavily engaged with the community and involved in a wide range of projects, to harness and reinforce community development and social inclusiveness.
- 7.497** A community group considered it important to provide local facilities to support young people and their futures in order to maintain them in education and training and provide routes to employment.

7.4.3.2 What does the evidence say?

- 7.498** The Council is part of the Local Strategic Partnership (LSP), which has adopted a Sustainable Community Strategy and a Local Area Agreement aimed at enhancing the quality of life for local residents, based on the needs and aspirations of Lewisham’s citizens. The successful implementation of these strategies is vital if Lewisham is to achieve the Core Strategy’s strategic objectives.
- 7.499** Evidence for specific sectors within this section provided below.

Overall

- 7.500** The Council has prepared a Social Infrastructure Framework Working Paper (SIF). The working paper will be used as a precursor to a more thorough analysis of infrastructure (social, physical and green) to reflect the requirements of PPS12⁽²⁰⁹⁾ prior to the consultation on the draft Core Strategy.
- 7.501** The SIF Working Paper report provides a preliminary assessment of the social infrastructure requirements associated with planned housing development and population growth forecast for the borough, aligned to the London Thames Gateway Social Infrastructure Framework Model. The services covered include education, health, leisure recreation, community facilities and open spaces and emergency services. Cross borough provision is not identified or considered.

- 7.502** It is necessary to make a great number of assumptions in the SIF process and while the model has shown some facilities in surplus and some in deficit given population growth, further work is needed before clear decisions can be made on exact social infrastructure needs. However, at this stage, the analysis of the forecast requirements for Lewisham has identified the following deficiencies:
- secondary school places; however, the BSF programme will create a surplus by 2012⁽²¹⁰⁾
 - primary healthcare and one-stop primary healthcare centres, with this increasing in 2012 and
 - considerable shortfall in the amount of community centre provision. However, it is recognised that much of the existing stock is under used.
- 7.503** The SIF Working Paper notes that while service provision for other facilities may be adequate or in surplus, there is disparity within the borough in terms of distribution. This will be looked at in more detail as part of a Lewisham Infrastructure Planning Report to inform the draft Core Strategy.

Education

- 7.504** The borough's 92 schools, the higher education institution of Goldsmiths College (University of London), the further education institution of Lewisham College and the Laban Centre play a central role in contributing to Lewisham's regeneration. This is supplemented through the borough's 12 libraries, which make a significant contribution to the development of basic skills and life-long learning.
- 7.505** Lewisham is facilitating an extensive secondary schools building programme. Through the Government's Building Schools for the Future (BSF) programme £186 million has been allocated to the borough and involves works to all of Lewisham's secondary schools. By 2012, the BSF programme will have increased provision by 1,385 places. This includes a new school in Lewisham Town Centre and extended capacity at several schools throughout the borough.
- 7.506** In 2005 the Government announced its intention to renew up to half of the primary school estate in England over a 15 year period to mirror the Building Schools for the Future (BSF) programme for secondary schools. In October 2007 the Government announced the details of capital funding for the 2008-11 spending review period, including the Primary Capital Programme. In a parallel announcement it was stated that in order for local authorities to access the capital funds a Primary Strategy for Change (PSfC) must be produced for approval by the Secretary of State for Children, Schools and Families. That plan requires an analysis of primary school places as well as the current condition of the primary schools' estate.
- 7.507** Lewisham is currently producing its PSfC and extensive discussions have taken place between the planning and education departments to ensure a consistent approach to analysing the borough's need for primary school place provision.
- 7.508** In March 2008, Lewisham Children's Centres Childcare and Play (CCCP) Unit produced a Childcare Sufficiency Review looking at overall provision in the borough. The report contains a study into childcare place vacancy rates by ward in the borough and shows that every ward in the borough has considerable capacity, with childcare place vacancy rates of between 7 and 26%.

210 This is likely to be taken up by pupils from adjoining boroughs attending Lewisham's schools

Health

- 7.509** Lewisham is among the 20% most deprived boroughs in the country and is part of the 'Spearhead' ⁽²¹¹⁾ group at the forefront of attempts to reduce health inequalities. Health deprivation in Lewisham as a whole has narrowed in recent years to a level closer to the national average. However, levels of deprivation and deprivation-related health issues in some wards such as Downham and Lewisham Central remain higher than average.
- 7.510** The Lewisham PCT through its Commissioning Strategy Plan ⁽²¹²⁾ has identified the following health priorities for the borough:
- improved health equalities and public health
 - improved life expectancy
 - improved quality of life and greater life expectancy for older people.
- 7.511** The Council is working with the NHS and other partners to improve the health and well-being of local people. One of the main focuses for the Lewisham Local Area Agreement is to tackle health inequalities and to improve the quality of life for older people by helping them live healthy, active, independent lives.
- 7.512** New health facilities recently completed include the Downham Health and Leisure Centre, the Waldron Centre in New Cross, and Kaleidoscope in Catford.
- 7.513** The borough is generally one of the least active in the UK as a whole ⁽²¹³⁾, with significant low levels occurring in the most deprived wards in the north ⁽²¹⁴⁾ and in the south of the borough ⁽²¹⁵⁾. These areas also correspond with lower levels of overall health. The provision of as many services and facilities as practical near to home will encourage walking and cycling with consequential health benefits.

Recreation facilities

- 7.514** The SIF Working Paper looked at swimming pool and sports activity courts provision. There are six Council-run swimming pools, one school-provided pool and one private gym pool. Provision is sufficient for the borough and will increase with new or improved facilities for Forest Hill, Lewisham Town Centre and Deptford by 2012. There is a sufficient supply of sports and activity courts, with a surplus of 18% forecast by 2012. Provision is lower in the wards of Evelyn, Brockley, Lewisham Central, Lee Green, Catford South and Grove Park.
- 7.515** The information from the consultation, audit and review for the Lewisham Physical Activity, Sport and Leisure Strategy ⁽²¹⁶⁾ suggests a fragmented picture in terms of activity. While there are lots of activities taking place and many opportunities to join in, there is no overall co-ordination to let people know what is taking place and where. There is also no broad quality assurance or common monitoring system to enable links and improvement.

211 A Government initiative to narrow health inequalities and make faster progress towards reducing the inequalities gap and secure delivery of the Department of Health (DH) Public Service Agreement targets

212 October 2007

213 Sport England Active People Survey, 2006

214 Evelyn, New Cross

215 Bellingham, Downham, Whitefoot

216 July 2006

- 7.516** In terms of facilities, there is a wide range of different management groups responsible for indoor and outdoor facilities. A range of agreements with common targets needs to be put in place to ensure a supportive framework for those providing the facilities/activities and those participating in them.
- 7.517** The recognition of the increasing role schools have to play in their local community and the new investment in school sport demonstrate the importance of providing the right facilities, in the right location, to maximise benefits for school and community users alike. As Lewisham's population is getting younger and more ethnically diverse, this potentially leads to a greater demand for a wider variety of sports facilities. Lewisham Council's Sport and Leisure Service sees local schools playing a vital role in the provision of sports facilities and activities. The BSF programme is a 'once-in-a-lifetime' opportunity to provide cost-effective high quality sports facilities for use for both curriculum and community purposes.

7.4.3.3 Possible options

- 7.518** Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 42

Community and recreational facilities

The option is for the Council to work with its partners to ensure a range of health, education, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough.

The work of the Lewisham Infrastructure Planning Report and the relevant corporate plans of partners will be used to inform provision.

The Council would apply the London Plan policies relating to healthcare, education and community and recreational facilities to ensure:

- there is no net loss of facilities
- the needs of future populations arising from development are sufficiently provided for
- the preferred location for new uses will be in areas that are easily accessible and located within close proximity of public transport, other community facilities and services and town and local centres
- co-location of services is encouraged and supported and
- a safe and secure environment is created and maintained.

Option 43

Delivering educational achievements

This option would see the Council support the:

- Local Education Authority's School Implementation Plan contributing to the Building Schools for the Future (BSF) programme and the Primary Capital Programme
- enhancement of Goldsmiths College (University of London), Lewisham College and the Laban Centre to improve the quality of teaching, learning and research in Lewisham
- broad range of education and training opportunities provided by local groups to strengthen local skill levels.

Option 44

Healthy lifestyles and healthcare provision

The option is that the Council will work with its partners, particularly the Lewisham Primary Care Trust (PCT), the Lewisham University NHS Trust, and the South London and Maudsley NHS Trust, to:

1. support the implementation of the Lewisham PCT Commissioning Strategy Plan and
2. Improve health and promote healthy lifestyles across the borough by:
 - ensuring that the potential health impacts of development are identified and addressed at an early stage in the planning process
 - supporting the Lewisham University Hospital, health centres and GP surgeries and
 - reducing health inequalities across the borough, particularly in the Downham and Lewisham Central wards.

7.4.3.4 Justification for the options

Consistency with national policy and guidance

- 7.519** The options support **PPS1**, which seeks to meet the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion, and creating equal opportunities for all citizens. The Government is committed to developing strong, vibrant and sustainable communities (para 14), where these issues are addressed through partnership working and effective community involvement (para15).
- 7.520** The Director of Public Health has identified ways in which the problem of child and adult obesity and associated problems can be tackled. The Core Strategy can play a role in contributing to the health agenda by providing and safeguarding walking and cycling routes in order to access green space for sport, play and recreation to increase physical activity. These issues were covered in sections 7.3.3 and 7.4.1.
- 7.521** Health policy is now more focused on health and well-being rather than illness and treatment (NHS 2004) and increasingly over the last few years the importance of health issues has increased within the planning system. The importance in spatial planning of delivering sustainable communities now involves planning to help address health inequalities and the provision of health services. Creating healthier communities and promoting health through development are becoming more of a priority, and this is set out in PPS1.
- 7.522** National policy supports the provision of indoor sport and recreation through **PPG17**. There is also a requirement to undertake an assessment of sport and recreation facilities, looking at current and future demands.

Consistency with regional strategy and guidance

7.523 The options are consistent with the **London Plan**, which aims to protect and enhance social infrastructure and community facilities. This encompasses the voluntary and community sector. Lewisham needs to assess the need for social infrastructure and reflect demands to ensure suitable provision. The key messages are to:

- identify appropriate locations accessible by public transport
- provide new facilities and the potential for expansion of existing provision
- improve the health of the local population and reduce health inequalities
- require social impact assessments for all major developments
- require Health Impact Assessment for major development proposals and ensuring that it promotes public health
- promote the development of sport and sports facilities to meet identified needs.

Consistency with the Sustainable Community Strategy and other council documents

7.524 The preferred option supports the implementation of the **Sustainable Community Strategy**, by narrowing the gaps in outcomes for citizens and ensuring that all citizens have appropriate access to and a choice of high quality local services. This includes:

- ambitious and achieving, where local people are inspired and supported to fulfill their potential and barriers to learning are removed
- empowered and responsible, where people are actively involved in their local area and contribute to supportive communities and
- clean, green and liveable, where people live in high quality housing and can care for and enjoy their environment.

7.525 The options are consistent and support the implementation of the **Lewisham Social Inclusion Strategy**. The strategy helps to ensure that all relevant services can work together to achieve social inclusion for all. The Council cannot deliver this strategy alone and recognises the need to make effective partnerships with public, private and voluntary sector providers.

7.526 The options reflect the **Social Infrastructure Framework Working Paper**, which provides information on the social infrastructure requirements for Lewisham associated with planned housing development and population growth.

7.527 The options would support the implementation of the **Lewisham PCT Commissioning Strategy Plan** to reduce the borough's health inequalities, provide health services closer to people's homes and place a greater emphasis on health promotion.

7.528 The options support Lewisham's **Local Education Authority School Plan** by ensuring the provision of adequate school places within the borough.

7.529 The options support the **Physical Activity, Sport and Leisure Strategy**. This is a five year plan to help bring together organisations which will work in partnership to develop and sustain sport and physical activity in Lewisham. As well as the Council, these include its leisure and parks contractors, the Primary Care Trust (PCT), sports coaches and PE teachers, sports clubs and schools. It lays out the issues and needs of the borough in terms of sport and physical activity, including facilities, and offers a clear plan which partners and providers and participants can adopt. The Strategy provides a framework for activity and development in Lewisham. It has three key aims to increase participation in physical activity and sport, to enable the Lewisham community to develop its potential in sport, to develop an appropriate infrastructure of facilities.

- 7.530** The options support the **School Sports Facility Strategy**. This ensures that the sports facilities at locations included in the Building Schools for the Future (BSF) programme form part of an integrated network of facilities delivering cost-effective curriculum and out-of-hours community use.

What did the Sustainability Appraisal say?

- 7.531** The options cover the provision of facilities that are essential for creating a sustainable community and seek to ensure provision for current and future needs. Minor negative impacts have been identified for environmental objectives such as local air quality, and noise due to construction activity. However, these are temporary effects where the impact will become minimal once construction is completed. The SA suggested that the options could be enhanced by seeking provision of additional facilities through appropriate Section 106 agreements.

7.4.3.5 Alternative options

- 7.532** Alternative options would relate to the location of facilities across the borough. However, this will be informed by the strategies of relevant partners and the work done by the Council through the Social Infrastructure Framework Working Paper.

Question 65

Community services options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 66

Community services issues

Are there any additional issues that need consideration?

Question 67

Community services options and alternatives

Is there another feasible option or options having regard to the alternatives?

Question 68**Further comments**

Are there any other comments relating to community services?

7.4.3.6 Implementation and monitoring**How would the Council implement the options?**

7.533 The options would be implemented through the development management process and in the following ways:

- through the identification of sites in the Development Policies and Site Allocations Document to support the Local Education Authority's School Organisation Plan and the Lewisham PCT Commissioning Strategy Plan and PCT Estate Strategy
- preparing and implementing a Supplementary Planning Document for development contributions which will include education, health and community issues
- continued negotiations with developers to ensure improvements are secured through Section 106 agreements
- In consultation with its partners the Council will deliver:
- the Building Schools for the Future (BSF) programme. This will see:
 - construction of a new all-through school at the Lewisham Bridge Primary School site to open in September 2010
 - rebuilding the Sedgemoor and Northbrook Schools to open in September 2010
 - redeveloping part of the Prendergast School and the Addey and Stanhope School to be completed by 2011
 - the consolidation of the Bonus Pastor School on a single site by September 2011 and the Deptford Green School on a single site by 2012
 - improvement work to the Sydenham School by September 2012
 - the New Horizons Project based at the Downham Health and Leisure Centre for adult learning
- Working with the Lewisham PCT to deliver the Commissioning Strategy Plan and support the PCT Estate Strategy, particularly through:
 - the preparation of a Joint Strategic Needs Assessment (JSNA)
 - the placement of PCT provider staff in the new Children's Centres
 - implementation of the north Lewisham health improvement plan in New Cross and Evelyn wards
 - reducing health inequalities in the Downham and Lewisham Central wards
 - ensuring the implementation of the Healthy Food Strategy, focusing on food in schools, access to food, food sustainability, safety, nutrition and health
 - ensuring the implementation of the Physical Activity, Sport and Leisure Strategy which seeks to encourage people to participate in sport or physical activity and provide the support and facilities for those already active in sport
 - protecting existing health facilities to meet current and future need and demand

- Working with the Lewisham Hospital NHS Trust to support the continued operations of the Lewisham University Hospital over the plan period and the South London and Maudsley NHS Trust for the provision of health services
- Completion of new leisure facilities incorporating swimming pools in Lewisham Town Centre at Loampit Vale by 2012 and rebuilding the Forest Hill pool to create a new leisure centre by 2012
- Facilitate the implementation of other key strategies including:
 - New Deal for Communities New Cross Gate
 - Creative Lewisham Delivery Plan
 - Lewisham Physical Activity, Sport and Leisure Strategy

How would the Council monitor the options?

- % of pupils achieving five or more GCSEs at grades A* to C or equivalent
- Number of learners completing adult education basic skills programme
- Number of visits to public libraries (per capita)
- Completion of projects funded through the BSF
- Operation of extended school programmes
- Number of community learning centres
- Reducing the inequalities in health outcomes across the borough by 10% by 2012
- Delivery of new investment in healthcare infrastructure
- Areas deficient in accessible leisure facilities
- Net changes in class D1 and D2 uses and the amount of land for social and community facilities lost to other development

Question 69

Implementation and monitoring

- Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.534** Community well-being could be negatively impacted if the Council failed to work with its partners to proactively plan for the provision of facilities or secure improvements through the planning process. A partnership approach is crucial if implementation is to be achieved. This is currently achieved through the work of the Local Strategic Partnership. However, there is a real risk to achieving full implementation of the options if the Government reorganises the functions of bodies delivering health and education services and reduces budgets.

- 7.535** The Council recognises that improvements to the physical environment will not on their own influence health determinants. If the impact of health inequalities is to be reduced, the Council will need to work with its partners, such as the Lewisham PCT and voluntary health and community organisations, to improve the health and well-being of the local community.

Signposts and evidence base

National

- PPS1 Delivering Sustainable Communities
- PPS12 Creating Strong Safe and Prosperous Communities through Local Spatial Planning
- PPG17 Planning for Open Space, Sport and Recreation

Regional

- London Plan, 2008
- London Plan SPG Planning for equality and diversity in London, 2007

Local

- Shaping our future: Lewisham's Sustainable Community Strategy 2008-2020
- Lewisham Social Inclusion Strategy (2005-2013), 2005
- Lewisham PCT Estate Strategy
- Lewisham PCT Commissioning Strategy Plan 2008-2012
- Local Education Authority School Plan
- Lewisham Social Infrastructure Framework Working Paper, 2008
- Lewisham Physical Activity, Sport and Leisure Strategy, 2006
- Lewisham School Sports Facility Strategy, 2006

7.4.4 Planning obligations and Community Infrastructure Levy

7.536 The Core Strategy policy options relate to collectively implementing each of the strategic objectives.

Overview and summary of issues to be resolved

7.537 The Council, as planning authority, will be responsible for ensuring that the environmental and infrastructure improvements and community facilities required as a result of increased development are secured and implemented in an appropriate manner. The funding and delivery of such will be secured via a planning obligation agreement or by conditions attached to any planning permission.

7.538 A planning obligation is an agreement between the Local Planning Authority and the developer that seeks to secure modifications or improvements to the proposal submitted. It is often used in circumstances that require some form of mitigation measures that would compensate for the impacts caused by the development, and can be applied in terms of environmental improvements, provision of facilities or sites, or any other improvement that can be reasonably provided. Obligations must be necessary; relevant to planning; directly related to the proposed development; fairly and reasonably related in scale and kind to the proposed development; and reasonable in all other respects.

7.539 The legal framework for planning obligations is Section 106 contained within the Town and Country Planning Act 1990 and Circular 05/2005. In accordance with the requirements of the Circular, planning obligations will be related to the needs and demands generated by each development and to the viability of provision. Individual developer obligations will fall into two categories:

- those requirements that are essential to the development of each individual site, i.e. the provision of affordable housing, open space, access, car and cycle parking, land use and sustainability targets
- financial contributions, i.e. financial and other contributions to area-wide facilities and benefits.

7.540 The Community Infrastructure Levy (CIL) will be a new charge which local planning authorities will be empowered but not required to charge on most types of new development. Part 11 of the Planning Bill currently before Parliament will form the legislative basis for CIL. The Planning Bill is clear that CIL may only be spent on infrastructure and it is intended to fund the infrastructure needs of development anticipated by the development plan for the area. It is not intended to remedy any existing deficiencies.

7.541 The Government proposes that the definition of infrastructure for CIL purposes should be wide. It could include infrastructure such as transport, schools and health centres, flood defences, play areas and other green spaces, many of which are currently funded under the planning obligations system. However, it is not intended that affordable housing provision should be funded through CIL.

7.542 In implementing CIL, there should be an up to date development plan (the Core Strategy) for an area before CIL may be charged. PPS12 states that development plans should be supported by an infrastructure planning process to identify what infrastructure will be needed to deliver the development plan. The idea is that if the Council wanted to adopt CIL, it would prepare a draft charging schedule which would be a new type of document in the LDF. Under current proposals this schedule would not be part of the development plan. The charging

schedule would be subject to a public inquiry by an independent planning inspector and the report from the inspector would be binding upon the Council. The charging schedule should allocate the proposed amount to be raised from CIL to each of the main classes of development envisaged by the development plan. Charges will be expressed as a cost per unit of development, for example £1,000 per dwelling or £1 per square foot of development.

7.4.4.1 Previous consultation responses

Summary of the Issues and Options consultation

- 7.543** The use of development contributions was put forward for issues relating to affordable housing, open space provision and improvements to open space, transport infrastructure requirements, affordable employment space and ensuring the health, education and community service needs arising from a development are provided.
- 7.544** There was overwhelming support for the Council to seek a planning obligation for the issues indicated. This would need to be in accordance with Government policy. The process needed to be transparent to provide more certainty for the community and developers.

Summary of the Preferred Options consultation

- 7.545** Comments received thought planning obligations should be considered on a site by site basis and that viability should be acknowledged in any policy.
- 7.546** The Greater London Authority (GLA) indicated that priorities for planing obligations should be set in accordance with the London Plan.
- 7.547** Community groups wanted to see specific obligations included to implement the Lewisham cycle network and improve biodiversity issues.

7.4.4.2 What does the evidence say?

- 7.548** The Council is currently in the process of preparing a Supplementary Planning Document (SPD) for planning obligations as part of the LDF. The Council proposes to use this document as a starting point or baseline position in the negotiation of each individual development contribution package. Once any financial contribution has been paid, it will be placed within a fund and will be used to realise a range of transport, environmental, social/community facilities and improvements, and economic initiatives.
- 7.549** The Council has produced a Social Infrastructure Framework Working Paper (SIF). This will inform the need and planning for social infrastructure over the plan period of 15 years. The SIF looks at requirements for education (nursery, primary and secondary); health (general practitioners, primary health care and dental surgeons); leisure (swimming pools, sports halls, indoor bowls); community facilities (community centres, libraries); open space (children's play space and allotments) and emergency services (police, fire and ambulance).
- 7.550** The SIF Working Paper looks at current and planned future supply and the likely demand if the population growth anticipated is achieved. It is necessary to make a great number of assumptions in the SIF process and while the model has shown some facilities in surplus and some in deficit given the population growth, further work is needed before clear decisions can be made on exact social infrastructure needs.

7.4.4.3 Possible options

- 7.551** Having regard to the previous rounds of consultation and the evidence base, the Council is considering the following options for inclusion as part of the draft Core Strategy. A justification for the options follows as well as alternative options for this policy area. Each option and alternative option is open for comment and additional options can still be put forward.

Option 45

Planning obligations

The option for planning obligations is that the need to provide infrastructure, services and/or facilities to serve the needs generated by new development will be considered by the Local Planning Authority from the outset of the planning application process.

The Council would use the requirements of Circular 05/05 to ensure effective implementation. This is outlined below.

- Planning obligations may be used to make a proposal acceptable in land use terms by prescribing the nature and form of development to achieve the objectives of the development plan or by mitigating the impacts of development and compensating for the loss or damage created by the development.
- Planning obligations will only be sought where they are necessary from a planning point of view; directly related to the proposed development; fairly and reasonably related in scale and kind to the proposed development; and for matters that cannot be adequately addressed by conditions attached to a planning permission.

The option is to prepare a Supplementary Planning Document (SPD) to show planning obligation priorities and this could identify a tariff approach to the calculation of planning obligations. The SPD would look at the range of topics, such as transport, education, open space and affordable housing and identify a formula for calculating the impact of the development and the contribution required.

Option 46

Community Infrastructure Levy

At this early stage in the Government's thinking on CIL, the options are necessarily wide.

The Council would like to know if there is support for developing CIL with the consequent scaling back in the use of planning obligations or if the Council should continue with the topic based approach to planning obligations.

7.4.4.4 Justification for the options

Consistency with national policy and guidance

- 7.552** **Circular 05/05** Planning Obligations, provides guidance on the use of planning obligations in England under Section 106 of the Town and Country Planning Act 1990 as substituted by the Planning and Compensation Act 1991.
- 7.553** The Community Infrastructure Levy (CIL) is included in the **Planning Bill** currently going through Parliament. The Department for Communities and Local Government published in August 2008 further details on how they anticipate CIL working in practice.

Consistency with regional strategy and guidance

- 7.554** The **London Plan** Policy 6A.5 (Planning obligations) states that boroughs should set out a clear framework for negotiations on planning obligations in DPDs. Policy 6A.4 (Priorities in planning obligations) states that affordable housing provision and public transport provision should generally be given the highest importance. Policy 6A.3 (Promoting development) states the Mayor will work with boroughs, the London Development Authority and Transport for London to identify the appropriate use of CPO powers where necessary to secure development.

Consistency with the Sustainable Community Strategy and other council policy documents

- 7.555** The options support the implementation of the **Sustainable Community Strategy** to make Lewisham the best place to live, work and learn by ensuring appropriate services and facilities are provided to support local communities.

What did the Sustainability Appraisal say?

- 7.556** The use of planning obligations and indeed CIL was identified as a mechanism to secure improvements to compensate for adverse impacts arising from a development. This can be used for the provision of affordable housing, environmental and transport improvements, or other community and economic benefits. The options are considered to have a positive impact on most of the SA objectives, provided implementation is effective. Trade-offs between competing benefits are possible and need to be managed to secure the optimum outcome.

7.4.4.5 Alternative options

7.557 The alternative option with regard to planning obligations is that the Council could adopt a single tariff that combines all the infrastructure requirements and divides the cost to arrive at a cost per home or per square metre of commercial development. This is similar to the 'roof tax' approach in Milton Keynes and in many respects anticipates the CIL being promoted by central government. Due to uncertainty regarding the guidance for CIL, the precaution of waiting to see what emerges from central government is preferred.

Question 70

Planning obligations and CIL options

Do you support the possible options for inclusion in the draft Core Strategy?

Question 71

Planning obligations and CIL issues

Are there any additional issues that need consideration?

Question 72

Planning obligations and CIL options and alternatives

Is there another feasible option or options having regard to the alternatives

Question 73

Further comments

Are there any other comments on planning obligations and the Community Infrastructure Levy?

7.4.4.6 Implementation and monitoring

How would the Council implement the options?

- Preparing and implementing a Supplementary Planning Document to show planning obligation priorities and identify a tariff approach to the calculation of planning obligations by 2010
- Where appropriate, negotiating with developers to secure a planing obligation

How would the Council monitor the options?

- Number of planning obligations (AMR)
- Type of obligation secured (AMR)

Question 74

Implementation and monitoring

Are there other ways the Council could implement and monitor the options?

Risk assessment

- 7.558** If such an approach is not taken forward, there is a risk that the demand for services and facilities arising from new development will not be catered for or addressed. A shortfall in provision will arise.

Signposts and evidence base

National

- Planning and Compulsory Purchase Act 2004
- Circular 05/2005 on Planning Obligations
- Various consultations on the Community Infrastructure Levy
- Planning Bill (draft)

Regional

- London Plan, 2008

Local

- Planning Obligations Supplementary Planning Document (under preparation)

What happens next?

- 8.1** Please tell us what you think about the options and alternative options contained in this Core Strategy Options Report. All comments received will be added to the feedback that has already been given on the Council's emerging Core Strategy.
- 8.2** Anyone can comment but it must be in writing. Comments can be made in the following way:

Web

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

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

OR

Post

Planning Policy

London Borough of Lewisham

5th Floor, Laurence House

1 Catford Road

Catford, SE6 4SW

OR

E-mail

planning@lewisham.gov.uk

with 'LDF Core Strategy Options Report' as the subject.

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

- 8.3** Following consultation on this document, the Council will then prepare a draft version of the Core Strategy. The draft Core Strategy will address any consultation comments received and will contain the strategy and draft policies the Council intends to take forward and adopt in its final Core Strategy.
- 8.4** There will be a further round of consultation and another chance to comment on the draft strategy and policies being put forward. It is expected that this will take place in the winter of 2009.

Preliminary vision to drive option development

- 1.1 The following were released for public consultation in May 2005 and contained in a document called 'Lewisham's Local Development Framework, the new planning system: consultation on the spatial vision, objectives and issues'.

Preliminary vision

- That the built and natural environment is characterised by quality design, energy efficiency and sustainable development, and that the places and spaces created are safe, attractive, promote healthy lifestyles, and are the best in London.
- That walking, cycling and public transport will be so good they become the community's preferred means of moving within the borough and beyond.
- That the local economy will be growing and meeting the needs of all in the community, with small and medium enterprises and the creative sector flourishing as its key drivers.
- That town and local centres will be dynamic, diverse and prosperous centres of activity meeting the needs of all the community.
- That a decent and affordable home will be available for all.
- That the community will live in a borough where services such as education and health are available locally and are provided by a variety of partners working together.
- That the Council will continuously consult the whole community on planning matters in an inclusive and responsive way, ensuring that consultation is meaningful to participants and that the community is able to influence and have a real say in decision making.

Revised vision in response to consultation and emerging policy preparation

1.2 The following vision was contained in the Preferred Options Report for the Core Strategy released for public consultation in June 2007.

Revised vision

- That Lewisham's social, economic and physical environment makes a positive contribution towards reducing green house gas emissions, mitigating and adapting to the effects of climate change.
- That Lewisham's built and natural environment is characterised by quality design and energy efficiency; and that the places and spaces created are accessible, safe, attractive, promote healthy lifestyles, and are the best in London.
- That Lewisham's residents live in a borough where community services, particularly health and education, are available locally and provided to the highest standard, so that they become the community's first choice, and are provided by a variety of partners working together.
- That the needs of the whole community are met, to ensure equalities and social inclusion, particularly for those suffering from disadvantage or discrimination.
- That all Lewisham residents have access to decent, quality and affordable homes, provided at a range of tenures and sizes, including family homes; that contribute to a sustainable community.
- That Lewisham's parks and open spaces are user friendly, with facilities for everyone including children and older people.
- That walking, cycling and public transport in Lewisham will be so easy, efficient and enjoyable they become the community's preferred means of moving within the borough and beyond.
- That Lewisham's town and local centres will be dynamic, diverse and prosperous centres of activity, meeting the needs of all in the community.
- That Lewisham's local economy will be growing and diversifying by attracting inward investment, including tourism, meeting the range of needs in the community; with small and medium enterprises and the creative sector flourishing as its key drivers, providing local employment and investment opportunities.

Preliminary objectives to drive options development

2.1 The following was published in May 2005 and contained in a document called 'Lewisham's Local Development Framework, the new planning system: consultation on the spatial vision, objectives and issues'.

Preliminary objectives

- To locate development where it will provide opportunities for people to meet their day-to-day needs for employment, shopping, education, and other key services.
- To create a built and natural environment that is well designed, safe and accessible to everyone.
- To protect and enhance the historic assets of Lewisham.
- To protect and enhance all open space and provide additional open space where deficient.
- To protect and wherever possible enhance nature conservation and biodiversity in the borough.
- To promote sustainable waste management, encourage recycling and provide adequate and appropriately located waste management sites.
- To reduce levels of environmental pollution, improve air and water quality and facilitate remediation of contaminated land.
- To promote greater energy efficiency and adoption of renewable forms of energy generation, reducing the contribution to climate change.
- To adopt a risk-based approach to development in flood hazard areas, and promote sustainable surface water drainage.
- To ensure a mix and balance of residential accommodation to meet housing needs.
- To promote sustainable modes of transport to minimise the need for car travel, and provide high levels of accessibility to all sectors of the community.
- To protect and increase the number, quality and range of local employment opportunities and promote business clusters.
- To protect a range of suitable sites for business including industrial uses to promote local economic growth.
- To sustain and improve the vitality and viability of the existing town and local centres and other key Lewisham features that may attract visitors.
- To create healthy communities through the adequate provision of educational, community and leisure facilities that are accessible to everyone.

Revised objectives in response to consultation and emerging policy

2.2 The following revised objectives were contained in the Core Strategy Preferred Options Report, June 2007.

Sustainable regeneration

- 2.3** To direct significant growth in jobs, homes and social infrastructure to those areas of the borough most able to accommodate it. This will build on the core Thames Gateway areas of Lewisham and in particular rely on locations in Lewisham and Catford town centres and the Deptford and New Cross areas in the north of the borough.
- 2.4** To manage growth in other areas of the borough according to sustainability criteria, taking into account the design of any new building in the local built context, access to a range of facilities, and transport accessibility.
- 2.5** To promote sustainable development by taking full account of the needs of air and water quality; energy efficiency and renewable forms of energy generation; waste management; flood risk assessment; and facilitate the remediation of land subject to contamination.

Equalities and social inclusion

- 2.6** To create healthy communities through the adequate provision of educational, community and leisure facilities and services that are accessible to everyone.
- 2.7** To ensure that the most deprived members of the community and the areas they live in receive priority consideration for renewal and regeneration, through a range of physical and social programmes.

Homes for all

- 2.8** To ensure a mix and balance of residential accommodation to meet housing needs for the whole community. This will involve planning for sufficient growth in the housing stock, and providing a range of tenures and accommodation sizes to meet needs, including family housing.

Promoting good design

- 2.9** To create a built environment that is well designed, safe and accessible to everyone, while protecting and enhancing the natural environment.
- 2.10** To protect and enhance the historic assets of the borough.

Open space and biodiversity

- 2.11** To protect and enhance open space and endeavour to provide additional open space where deficient.
- 2.12** To protect and enhance nature conservation and biodiversity in the borough.

Sustainable movement

- 2.13** To promote sustainable modes of transport to minimise the need for private car travel, and provide high levels of accessibility to all sectors of the community, particularly through public transport, walking and cycling.

Sustainable economy

- 2.14** To protect and increase the number, quality and range of local employment opportunities, promoting business clusters, mixed use development and the creative industries; and to protect a range of suitable sites for business including industrial uses, promoting local economic growth.
- 2.15** To sustain and improve the vitality and viability of the existing town and local centres, and other key Lewisham features that may attract visitors.

Housing

3.1 Housing targets

- Two options were put forward relating to housing targets:
 1. Set a target for new housing as derived from the London Housing Capacity Study
 2. Set a target that exceeds the London Plan or that derived from the London Housing Capacity Study.
- It is worth noting that the two options put forward preceded the adoption of the housing targets in the Alterations to the London Plan ⁽²¹⁷⁾. Nevertheless, the London Housing Capacity Study was used as the evidence on which the adopted housing targets contained in the Alterations to the London Plan were based.

3.2 Affordable housing

- To determine an appropriate threshold for affordable housing, three options were put forward in the Housing Issues and Options paper:
 1. To seek a contribution to affordable housing on sites capable of providing more than 15 dwellings or sites of more than 0.5 hectares.
 2. To seek a contribution to affordable housing on sites capable of providing more than 10 dwellings.
 3. To seek a contribution to affordable housing on all residential sites.
- To determine an appropriate amount of affordable housing, four options were put forward in the Housing Issues and Options paper:
 1. To seek, as a starting point for negotiations, a contribution of 20% of affordable housing.
 2. To seek, as a starting point for negotiations, a contribution of 35% of affordable housing.
 3. To seek, as a starting point for negotiations, a contribution of 50% of affordable housing.
 4. To seek, as a starting point for negotiations, 50% of affordable housing as part of large housing developments.
- To determine an appropriate tenure for affordable housing, and assist in the creation of mixed and balanced communities, six options were put forward in the Housing Issues and Options paper:
 1. Affordable housing contribution of 70% social rented and 30% intermediate across the whole borough.
 2. Only intermediate affordable housing in areas with high social housing.
 3. Facilitate 'off site' social rented housing.
 4. Focus social rented housing in areas with currently low representation.
 5. Make decisions case by case.
 6. As part of an intermediate contribution, seek key worker housing.

3.3 Housing Mix

- Four options were put forward relating to housing mix in the Housing Issues and Options paper:
 1. Set a preferred housing mix for affordable housing.
 2. Set a housing mix for market housing.
 3. Set a broad mix for all housing.
 4. Do not have a housing mix policy.

3.4 Special needs and specialist housing

- Two options were put forward relating to special needs and specialist housing as part of the Housing Issues and Options paper:
 1. To encourage the provision of special needs housing.
 2. To encourage the provision of special needs housing but ensure that surrounding land uses are considered so that a concentration of such housing is not created.

3.5 Lifetime homes and wheelchair accessible homes

- Four options were put forward for lifetime homes and wheelchair accessible housing in the Housing Issues and Options paper:
 1. Require all housing to meet lifetime home standards.
 2. Require all housing in major developments to meet lifetime homes standard.
 3. Require 10% of all new housing to be wheelchair accessible or easily adapted for those using a wheelchair.
 4. Require 10% of all new housing in major developments to be wheelchair accessible.

3.6 Gypsy and traveller sites

- One option was put forward for gypsy and traveller sites as part of the Housing Issues and Options paper:
 1. Set out criteria for assessing new gypsy and traveller sites.

Urban design and conservation

3.7 Development in context

- Four options were put forward relating to development in context:
 1. Maximise intensity of use compatible with local context.
 2. Higher density development should take place around existing centres close to good public transport. A general density standard should be applied across the rest of the borough but individual developments would be judged on merit.
 3. Carry forward current Lewisham Unitary Development Plan policies to meet these aims.
 4. Additional or amended Unitary Development Plan policies.

3.8 High (tall) buildings

- Four options were put forward relating to tall buildings:

1. Tall buildings should be welcomed in locations identified by borough-wide context studies.
2. Tall buildings should be ruled out in certain locations identified by context studies, and directed to sites where high buildings already exist (major town centres) subject to their suitability, or where a planning study identifies a particular location as suitable.
3. Allow tall buildings subject to general location, height, massing and context standards based on the criteria contained in general development control policies.
4. Include general criteria policy for judging the design quality of tall buildings.

3.9 Historic environment and listed buildings

- The following issues were put forward for consideration when dealing with the historic environment and listed buildings:
 - preservation and enhancement of the historic aspects of the borough's environment
 - policies to reconcile conservation and economic growth where possible and allow for appropriate change
 - integration of older buildings into the townscape
 - lists of locally important buildings
 - preserve and enhance the archaeological and valuable elements of the borough's environment
 - preserve and enhance Listed Buildings
 - conservation area appraisals, and management plans.
- This list is not necessarily final or exhaustive.
- Do you have any suggestions for other subject headings or for what might be included under the above subject headings?
- Do you think there are any special aspects of the borough's environment worth preserving or enhancing that may not have been recognised so far?

3.10 Views and landmarks

- The following options were put forward relating to views and landmarks:
 1. Maintain current set of views and landmarks.
 2. Modify the criteria for selection of local views by changing criteria to include significant local 'vistas'.

3.11 Areas of special character

- Four options were put forward relating areas of special character:
 1. Continue current protection to all Areas of Special Character as defined in the Lewisham Unitary Development Plan.
 2. Remove protection for Thames Area of Special Character.
 3. Remove protection for Sydenham Ridge Area of Special Character.
 4. Remove protection for Blackheath Area of Special Character.

3.12 River frontage and the River network

- The following issues were put forward for consideration relating to the river frontage and river network:
 - Development should respect and enhance the character of the River Thames and the Ravensbourne River/Deptford Creek Network.
 - The Council will carry this option forward into the Core Strategy, in the light of London Plan policy and the importance accorded to protecting the character of the rivers. The following headings will be included in the development policies document:

3.13 River design issues

- The following issues were presented as part of the Issues and Options consultation:
 - Design of development adjacent to the river network – active frontages to address the river, connectivity, views inland, views of the river.
 - Retain river related uses, moorings, mooring facilities and equipment and infrastructure.
 - Improve the Thames and Deptford Creek environment and respect its special character tidal defences, prevention of encroachment over the water area; make provision for Thames Path implementation and access to the Thames Foreshore.
 - Nature conservation interest.
 - New development to make provision for Waterlink Way long-distance cycle way/footpath.
 - Archaeological heritage.
 - Design statements for significant new developments.
- Do you have any further suggestions that might be included in this list?
- Do you have suggestions for new long distance paths or changes or extensions to Waterlink Way?

3.14 Improving the image of the borough, reducing crime and the fear of crime, the inclusive and accessible environment

- The new Local Development Framework documents will contain a suite of urban design policies designed to meet the aims of achieving high quality urban design, deliver access for all and reduce crime and the fear of crime. It is proposed that the policy approach towards guiding new development in the current Lewisham Unitary Development Plan will be taken forward largely unchanged.

Sustainable environment

3.15 Renewable energy and energy efficiency

3.16 Five options were put forward for improving the use of energy:

1. The Council will take a proactive approach to improving energy efficiency and reducing carbon dioxide emissions in the borough.
2. The Council will seek an improvement in the integration of land use and transport, reducing the need to travel by car.
3. Energy efficiency should be encouraged within existing building stock and within new build developments.
4. The Council shall require an assessment of energy demand of a proposed major development (either new build or conversion) with a floorspace of 1000 m² or more, or ten or more residential units, demonstrating steps to apply the energy hierarchy.
5. The Council will require improved energy efficiency through consideration of the following criteria for assessment of new building developments:
 - Design of the buildings with passive solar design (orientated so living spaces face within 45° of south) – shading for non-residential
 - Maximise day lighting angles
 - High insulation window glazing
 - Clothes drying / amenity space provided
 - Siting of doors and windows for natural ventilation
 - Integration of renewable energy equipment should be encouraged where appropriate.

3.17 Three options were put forward to deal with providing for renewable energy:

1. The Council will require all new residential and non-residential developments (either new build or conversion) with a floorspace of 1000 m² or more or ten or more residential units, to incorporate on-site renewable energy equipment to provide at least 10% of the predicted energy requirements of the development.
2. The Council will require all new residential and non-residential developments (either new build or conversion) with a floor space of 1000 m² or more or ten or more residential units, to incorporate on-site renewable energy equipment to provide at least 10% of the predicted energy requirements of the development, where feasible.
3. The Council will support the development of stand alone and roof mounted renewable energy schemes where site conditions make them feasible. Criteria for assessment will include:
 - Wind turbines:
 - More viable in low density areas.
 - Assess suitability of the site (design, location, size, scale, access for maintenance – dependant on size of turbine).
 - Assess likely impact of noise from blades and mechanical components for noise sensitive receptors assessed against local background noise.
 - Assess visual obtrusiveness from public viewpoints.
 - Ensure minimum distances for reflected light and shadow flicker from sensitive adjoining landuses.
 - Special consideration in Open Space areas / conservation area / historic interest area.
 - Solar Panels / Photovoltaics:
 - Discrete siting on a building, designed as integral part of roof.

- Panels to lie flush with the roof slope avoiding visual obtrusiveness.
- Assess visual compatibility in Conservation Areas or on historic buildings – from public viewpoints.
- Any other renewable energy schemes (if external to the building):
 - Sited appropriately without creating adverse amenity effects on adjoining land uses.

3.18 Flood risk, climate change and sustainable drainage

3.19 Seven options were put forward relating to flood risk, climate change and sustainable drainage:

1. Sequential test applied to development in Zone 3 flood risk areas.
2. Minor extensions to households in flood hazard areas.
3. Risk based approach for development in flood risk areas.
4. Balanced management of social and economic needs and flood risk.
5. Requirements for flood protection and mitigation measures in flood Zone 3 via Section 106 agreements.
6. Mitigating measures accompanied by development proposal to be subject to sustainability appraisal.
7. Use of sustainable urban drainage systems (SUDS).

3.20 Air quality

3.21 Two options were put forward relating to air quality:

1. Development and Air Quality assessments.
2. Air Quality assessment criteria.

3.22 Contaminated land and hazardous substances

3.23 Four options were put forward relating to contaminated land and hazardous substances:

1. Developments on contaminated land and proposals for remedial treatment by developers.
2. Criteria for polluting developments.
3. Storage of hazardous substances.
4. Safe storage of hazardous substances.

3.24 River water quality, water resources and infrastructure

3.25 Four options were put forward relating to river quality, water resources and infrastructure:

1. Protect and improve river water quality.
2. Protect and conserve water supplies with sustainable use of water resources.
3. Water and sewerage infrastructure capacity.
4. Development of water supply and waste water facilities.

3.26 Noise and light effects

3.27 Two options were put forward relating to noise and light effects:

1. Minimisation of noise.
2. Light attenuation.

3.28 Sustainable use of building materials and aggregates

3.29 One option was put forward relating to the sustainable use of building materials and aggregates:

1. Efficient use of building materials and recycling of aggregates.

Waste management

3.30 Waste reduction

- Four options were presented to reduce waste:
 1. Minimise waste and apply the waste hierarchy.
 2. Provide waste storage and recycling facilities for developments of 5 units and above (criteria based policy).
 3. Provide waste storage and recycling facilities for developments of 15 units and above (criteria based policy).
 4. Require all new commercial/business operations to demonstrate how waste storage and recycling facilities are to be incorporated onto the site.

3.31 Provision of new waste management sites

- Four options were presented to provide for a new waste management site:
 1. Encourage waste management facilities in northern preferred employment locations.
 2. Encourage waste management facilities in all preferred employment locations.
 3. Criteria for locating waste management facilities.
 4. Encourage recycling points in areas.

3.32 Protection of existing waste management sites

- Two options were presented to protect existing waste management sites:
 1. Encourage retention of existing waste management sites unless appropriate compensatory provision is made (policy applying to council-managed waste management facilities only).
 2. Encourage retention of existing waste management sites unless appropriate compensatory provision is made (policy applying to council-managed waste management facilities and private enterprises).

Community facilities

3.33 Seven options were put forward relating to community facilities:

1. Protect existing sites used (or previously used) for health, education and community facilities from redevelopment to other uses.

2. Ensure that the health, education and community service needs arising from a development are provided for.
3. Require major developments to undertake a social impact assessment.
4. Encourage the provision of health, education and community facilities to locate in areas with good public transport.
5. Provide flexibility for health, education and community uses serving a very local area to locate in residential areas.
6. Facilitate the up grade/redevelopment/improvement of existing facilities.
7. Ensure leisure, community, arts, cultural, entertainment and sports facilities are located in appropriate places that both contribute to sustainability objectives and provide access for users.

Transport

3.34 Better public transport

- Three options were put forward relating to better public transport:
 1. The Council will encourage the safeguarding of transport facilities through avoiding inappropriate development.
 2. The Council will support and promote public transport improvements.
 3. The Council will support rail and other transit improvement schemes that benefit local residents, subject to environmental impacts, in particular:
 - East London Line extension
 - Extension of the DLR from Lewisham to Catford
 - DLR three car capacity enhancement
 - Extension of the Croydon Tramlink to Lewisham
 - Extension of the Greenwich waterfront transit to Canada Water
 - Orbital rail route improvements.

3.35 Traffic management and car parking

- Nine options were put forward relating to traffic management and car parking:
 1. Continue to use the UDP car parking standards for new development proposals.
 2. Adopt the London Plan standards for car parking.
 3. Introduce some other car parking standards.
 4. Require specific cycle provision as part of all developments.
 5. Negotiate cycle provision on an individual basis.
 6. Promote car-free residential development in areas with excellent public transport facilities.
 7. Insist on some minimum parking provision in relation to all residential development.
 8. Extend the provision of controlled parking zones (CPZs).
 9. Require developers to contribute towards the implementation of CPZs.

3.36 Walking and cycling

- Seven options were put forward relating to walking and cycling:
 1. To secure the protection of ecological and recreational links and corridors.
 2. There should be a requirement for specific cycle provision as part of all development.
 3. The Council should negotiate cycle provision on an individual basis.

4. Where development will result in adverse impacts on links identified in the UDP maps (pedestrian and cycle), planning permission for it should only be granted where adequate mitigation measures are put in place. The Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.
5. The Council will only permit development in areas identified in the planning proposal maps as 'Waterlink Way' or Green Chain if it enhances the biodiversity or recreational use of the links.
6. Development should respect and enhance the character of the River Thames and the Ravensbourne River/Deptford Creek Network.
7. To encourage greater accessibility by public transport, walking and cycling to all retail and town centres, for all sectors of the community including people with disabilities.

Open space and biodiversity

3.37 Protection and enhancement of open space and avoiding inappropriate development

- Eight options were put forward relating to protecting and enhancing open space and avoiding inappropriate development:
 1. The Council to refuse planning permission for developments within any open space that is likely to result in an adverse effect on its use, management, amenity or enjoyment.
 2. The Council to refuse planning permission for developments on land fringing, abutting or otherwise having a visual relationship with any open space that is likely to result in an adverse effect on its use, management or enjoyment.
 3. The Council to refuse planning permission for developments on land fringing, abutting or otherwise having a visual relationship with Metropolitan Open Land (MOL) that is likely to result in an adverse effect on its use, management or enjoyment.
 4. The Council to protect all MOL and POS from inappropriate built development but adopt a more permissive approach to development on public open space (POS)/ Urban Green Space (UGS) based on criteria such as:
 - design
 - scale
 - visual Amenity
 - views
 - Light.
 1. Requirement that any new development sets aside 1.7ha/1,000 head of population average of open space.
 2. Development contributions to acquire land or cash for future acquisition of land, or for maintenance of nearby open space, relative to the increase in population pressure.
 3. Council to negotiate with landowners to open up private open space to allow public access.
 4. An assessment of the availability of brownfield land to be designated for open space regeneration.

3.38 Dealing with open space deficiencies

- Three options were put forward to deal with open space deficiencies:

1. The borough adopts a target of 1.7ha/1000 head of population average of open space by 2006 and 1.75ha by 2010 over the whole of the borough.
2. Borough maintains 1.67ha/1,000 head of population average, with no aim to increase.
3. Target of 1.7ha/1,000 head of population average of open space set over areas of deficiency as defined in UDP maps by 2006 and 1.75ha by 2010.

3.39 Open space provision – quality and maintenance

- Four options were put forward relating to open space provision and its quality and maintenance:
 1. Adopting the actions documented in the Open Space Strategy for Lewisham 2005-2010.
 2. Setting quality standards and criteria to assess the current situation and priorities for improvements and on going public consultation to gauge satisfaction with open spaces.
 3. In areas of deficiency the Council will not permit development which will adversely affect accessibility to open space.
 4. In areas of deficiency the Council will seek Section 106 development contributions to improve the quality of public open spaces facing increased pressure.

3.40 Protection and enhancement of natural habitats and biodiversity

- Six options were put forward to address the protection and enhancement of national habitats and biodiversity:
 1. Adopt target that the existing 3.5% of public space actively managed as natural habitat should increase to 4.5% by 04/05, to 5% by 05/06 and to 5.5% by 06/07.
 2. Subject to other planning considerations, developments seeking to conserve or enhance the biodiversity and geological conservation interests of the area and/or the immediate locality should be permitted.
 3. Encourage naturalisation of waterways and esplanade areas in consultation with the Environment Agency.
 4. Support for developments using green building methods.
 5. Where development will result in adverse impacts on biodiversity and conservation, planning permission for it should only be granted where adequate mitigation measures are put in place. Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.
 6. Council will need to be satisfied that any reasonable alternative sites for development have been fully considered.

3.41 Protection and enhancement of open space links and corridors

- Three options were put forward to protect and enhance open space links and corridors:
 1. Where development will result in adverse impacts on links identified in the UDP maps, planning permission for it should only be granted where adequate mitigation measures are put in place. Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.

2. Council will only permit development in areas identified in the planning proposal maps as 'Waterlink Way' or Green Chain if it enhances the biodiversity or recreational use of the links.
3. Council will encourage proposals for naturalisation of waterways in conjunction with the Environment Agency.

Employment

3.42 Strategic employment locations

- Two options were put forward to protect strategic employment locations:
 1. Maintain current Strategic Employment Location boundaries (status quo).
 2. Remove or add sites to Strategic Employment Locations.

3.43 Defined employment locations

- Three options were put forward relating to defined employment locations:
 1. Retain all the current Defined Employment Areas and refuse planning permission for changes of use away from business uses.
 2. Remove protection for business/industrial uses in Defined Employment Areas.
 3. Review appropriateness of retaining Defined Employment Areas based on a set of criteria, with a view to removing protection for business, industrial and commercial uses from a number of sites.

3.44 Alternative uses in the defined employment areas

- Three options were put forward:
 1. Allow for 100% residential development in Defined Employment Areas.
 2. Allow 'mixed use' commercial and residential with an element of affordable housing (suggest 50%) in Defined Employment Areas. Also consider community facilities such as schools, surgeries, etc.
 3. New development in Defined Employment Areas should be 100% affordable housing where possible.

3.45 Creation of new business floorspace

- One option was put forward:
 1. Create new affordable employment floorspace by requesting contributions from large new developments.

3.46 Other employment sites

- Three options were put forward:
 1. Preserve all these sites in business/industrial use.
 2. Remove protection from these sites and allow redevelopment for mixed use commercial and housing or 100% housing.
 3. Assess applications for the redevelopment of these sites flexibly on the basis of criteria.

3.47 Office development

- Two options were put forward:
 1. Direct larger office development to the Major Town Centres of Lewisham and Catford. Small scale developments will generally be acceptable in other locations (e.g. district town centres) and also ancillary to existing employment generating uses.
 2. Live-work developments should only be allowed in attractive older workshop/warehouse buildings as a way of ensuring their continued use.

3.48 Employment clusters and creative industries

- One option was put forward:
 1. Identify 'Creative Quarters' where the Council will encourage development of creative enterprises.

3.49 Live-work developments

- Three options were put forward for live-work developments:
 1. Live-work developments should be welcome in Defined Town Centres, and locations closely associated with Local Shopping Parades where the use does not conflict with residential amenity. Applications for live/work developments in Defined Employment Areas and other employment sites would be judged according to the policies relevant to those areas.
 2. Live-work developments should only be allowed in attractive older workshop/warehouse buildings as a way of ensuring their continued use.
 3. Live-work Developments should be refused planning permission in favour of mixed use commercial and residential development or 100% residential development.

Retail

3.50 District centres

- A choice of six options were put forward for District centres:
 1. Maintain and enhance the existing focus and strength of the role and function of district centre, of that of a local service centre.
 2. Enhance the existing focus and strength of the role and function of the District town centre, to that of a local service centre.
 3. Aim to attract more national names to diversify the provision of goods and services within the District centres.
 4. Enhance and further encourage the existing strength of the evening economy.
 5. Increase the number of comparison stores, towards a balance of convenience and comparison outlets, similar to national averages (i.e. to enhance the day time economy).
 6. Encourage new residents to the area, which would require a greater variety of shops in the Deptford District centre.
- **Viability and vitality**
 - Three options were put forward for District centres:
 1. The use of designated Core and Secondary or Non-Core areas within the District Centre.

2. Specialist areas or quarters which have a focus on a particular/complementary use/activity.
 3. No restrictions on various uses within the designated centre boundary.
- **Accessibility**
 - One option was put forward to address accessibility:
 1. Encourage greater accessibility by public transport, walking and cycling to all retail and town centres.
 - **Boundary alignment**
 - Two options were put forward relating to boundary alignments:
 1. Retain the boundaries as currently indicated in the UDP.
 2. Modify the district centre boundary with alternative configurations.

3.51 Local shopping centres and parades

- **Role and function**
 - Three options were put forward to address the role and function of local shopping centres and parades:
 1. The role and function of local shopping centres and parades is to provide for the daily need for goods and services of the surrounding local community. This role should be maintained, enhanced and where possible further encourage this local role and function.
 2. Maintain the current level of flexibility for the change of use.
 3. Plan for the decline in unsuccessful centres. Planning policies could address decline in some centres. This information would be formulated for each individual centre and based on local circumstances.

3.52 Vitality and viability

- Five options were put forward for local shopping centres and parades:
 1. Encouraging a safe, clean and inviting shopping environment.
 2. Seeking to maintain a healthy supply of local shops providing the necessary daily goods and services or plan to contract the shopping function in declining centres.
 3. As is current practice, in cases where a shop within a local parade is no longer viable should alternative uses be considered to provide/ensure interaction with the street?
 4. A combination of the above options which can be used to maintain, enhance, or otherwise, the vitality and viability of the neighbourhood centres.
 5. A combination of the above options which can be used to maintain, enhance, or otherwise, the vitality and viability of the neighbourhood centres.

3.53 Out-of-centre proposals

- Two options were put forward relating to out-of-centre proposals:

1. The Sequential Test can be used to guide the location of any out-of-centre development.
2. Current planning policy sets guidance for developments, based on the above Sequential Test, which are greater than 1000 m² of gross floorspace. Is this threshold appropriate?

- 4.1 The following objectives have been included as part of the Sustainability Appraisal for the Core Strategy.

Economic

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

Environmental

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

Social

1. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home
2. To improve the health and well-being of the population
3. To reduce poverty and promote social exclusion
4. To provide for the improvement of education and skill levels
5. To reduce crime, anti-social behaviour and the fear of crime
6. To encourage a sense of community identity and welfare
7. To improve accessibility to leisure facilities, community infrastructure and key local services

4.2 Figure 4.1 illustrates how the objectives of the Sustainability Appraisal relate to the proposed Core Strategy strategic objectives.

Figure 4.1 Relationship between the proposed Core Strategy strategic objectives and the Sustainability Appraisal objectives



- 5.1** Sections 6.6.2 and 6.7.2 provided indicative housing capacity figures arising from implementing either Strategic Spatial Option 1 or Strategic Spatial Option 2.
- 5.2** The following table provides details for each locality relating to housing capacity and the phasing of development from 2010 to 2025. The 'Mixed Use Sites' applicable only to Option 1 have been marked with a * in the table.

Development allocation details

Table 5.1 Key housing sites proposed under Strategic Spatial Options 1 or 2

| Site | Total | 09/10 | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 |
|---------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Catford | | | | | | | | | | | | | | | | | |
| Shopping Centre | 600 | | | | | | 120 | 120 | 120 | 120 | 120 | | | | | | |
| Plassy Road | 500 | | | | | 100 | 100 | 100 | 100 | 100 | | | | | | | |
| Former Greyound Stadium | 589 | | | | 200 | 200 | 189 | | | | | | | | | | |
| Wickes | 300 | | | | | | | | | | 60 | 60 | 60 | 60 | 60 | | |
| Lewisham | | | | | | | | | | | | | | | | | |
| Gateway | 800 | | | | | 267 | 267 | 266 | | | | | | | | | |
| Loampit Vale (LV) - W of Elmira | 350 | | | 70 | 70 | 70 | 70 | 70 | | | | | | | | | |
| LV - E of Elmira | 400 | | | 80 | 80 | 80 | 80 | 80 | | | | | | | | | |
| LV - W of Jerrard | 290 | | | | 100 | 100 | 90 | | | | | | | | | | |
| LV sites | 350 | | | | | | | | 70 | 70 | 70 | 70 | 70 | 70 | | | |
| LV - Railway strip | 60 | | | | 60 | | | | | | | | | | | | |
| Lee High Rd - E side | 53 | 53 | | | | | | | | | | | | | | | |
| Connington Rd (N Link) | 430 | | | | 90 | 90 | 85 | 85 | 85 | 90 | | | | | | | |
| Connington Rd (Tesco) | 628 | | | | | | 125 | 125 | 125 | 125 | 125 | | | | | | |

| Site | Total | 09/10 | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 |
|----------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Deptford New Cross | | | | | | | | | | | | | | | | | |
| NC Hospital | 40 | | | 20 | 20 | | | | | | | | | | | | |
| Seager | 192 | | | 90 | 35 | 35 | 32 | | | | | | | | | | |
| Giffin St | 238 | | 38 | 100 | 100 | | | | | | | | | | | | |
| Octavius St / Deptford Station | 115 | | 58 | 57 | | | | | | | | | | | | | |
| NC Gate Station sites | 285 | | | 57 | 57 | 57 | 57 | 57 | | | | | | | | | |
| Tanners Hill | 62 | 62 | | | | | | | | | | | | | | | |
| Rival Envelope Co. | 88 | 88 | | | | | | | | | | | | | | | |
| Thanet Wharf | 226 | | 113 | 113 | | | | | | | | | | | | | |
| Brockley Cross sites | 120 | | | 40 | 40 | 40 | | | | | | | | | | | |
| South of the borough | | | | | | | | | | | | | | | | | |
| Forest Hill station | 24 | | 24 | | | | | | | | | | | | | | |
| Finches site on Perry Vale | 71 | 71 | | | | | | | | | | | | | | | |
| Rear Christian Fellowship Centre | 87 | | | | | | 87 | | | | | | | | | | |
| Nightingale Grove | 57 | | 57 | | | | | | | | | | | | | | |
| 9 Staplehurst Rd | 57 | | 30 | 27 | | | | | | | | | | | | | |

| Site | Total | 09/10 | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 |
|---|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| O'Rourke / Sivyer Transport | 29 | | | | | 29 | | | | | | | | | | | |
| 1113-137 Sydenham Rd | 49 | | | | | 49 | | | | | | | | | | | |
| Former United Dairies | 44 | | | | 44 | | | | | | | | | | | | |
| Bell Green | 156 | | | 78 | 78 | | | | | | | | | | | | |
| Courts | 141 | | | 70 | 71 | | | | | | | | | | | | |
| Mixed Use Sites (sites marked with * apply only to Option 1) | | | | | | | | | | | | | | | | | |
| Childers/Arklow Rd* | 200 | | | | 50 | 50 | 50 | 50 | | | | | | | | | |
| Oxestalls Rd* | 950 | | | | | 59 | 337 | 299 | 255 | | | | | | | | |
| Plough Way* (Cannon Wharf) | 750 | | | | 354 | 380 | 16 | | | | | | | | | | |
| Surrey Canal Rd* | 2700 | | | | | | | | 270 | 270 | 270 | 270 | 270 | 270 | 270 | 270 | 270 |
| Grinstead Rd* | 160 | | | | | 32 | 32 | 32 | 32 | 32 | | | | | | | |
| Convoys Wharf | 3500 | | | | | | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Sun & Kent Wharf | 300 | | | | | | | 60 | 60 | 60 | 60 | 60 | | | | | |
| Estate Renewal | | | | | | | | | | | | | | | | | |
| New Cross Gate NDC Centre | 173 | | | 173 | | | | | | | | | | | | | |
| Kender Estate | 239 | | | | | | | | | | | | | | | | |
| Excalibur Estate | 274 | | | | 90 | 90 | 94 | | | | | | | | | | |

| Site | Total | 09/10 | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 |
|------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Silwood Estate | 227 | | | | 227 | | | | | | | | | | | | |
| Heathside & Lethbridge | 768 | | | | | 256 | 256 | 256 | | | | | | | | | |
| 2-36 Plassy Rd | 60 | | | | 60 | | | | | | | | | | | | |

- 6.1 Affordable Housing** includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:
- meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices
 - include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision (Annex B PPS3).
- 6.2 Annual Monitoring Report** A report submitted to the government by local authorities or regional planning bodies assessing progress with and the effectiveness of a Local Development Framework (or, currently, a Local Plan).
- 6.3 Area Action Plan (AAP)** A type of Development Plan Document focused upon a specific location of an area subject to conservation or major change (for example major regeneration).
- 6.4 Biodiversity** Biodiversity is the variety of life, which includes mammals, birds, fish, reptiles, amphibians, invertebrates, fungi and plants and the woodlands, grasslands, rivers and seas on which they all depend including the underlying geology.
- 6.5 Code for Sustainable Homes** A national standard for sustainable design and construction of new homes which will be mandatory from 1 May 2008. The Code measures the sustainability of a new home against categories of sustainable design, using a 1 to 6 rating system to communicate the overall sustainability performance of a new home. The Code sets minimum standards for energy and water use at each level. Go to <http://www.communities.gov.uk/> to find out more.
- 6.6 Comparison Retailing** is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
- 6.7 Conservation Area** Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.
- 6.8 Contribution** Land, services, facilities and/or money given by developers of land to the local authority following negotiations, to ensure that the needs of new communities generated by the development are catered for.
- 6.9 Convenience Retailing** Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.
- 6.10 Core Strategy** A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for the area, in line with the Sustainable Community Strategy.
- 6.11 Department for Communities and Local Government (DCLG)** The Government Department responsible for setting UK policy on local government, housing, urban regeneration, planning and fire and rescue.

- 6.12 Development** "The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material changes in the use of any building or other land." (Town and Country Planning Act (1990) Part III Section 55).
- 6.13 Development Plan Document (DPD)** A Local Development Document that has been subject to independent testing and has the weight of development plan status. Replaces the Local Plans system.
- 6.14 Evidence Base** The data and information about the current state of Lewisham.
- 6.15 Flood Risk Assessment** An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.
- 6.16 Government Office for London (GOL)** The integrated Government Regional Office for London, with the following directorates: Education, Industry and Trade, Environment and Transport, and Strategy and Resources.
- 6.17 Gypsy and Traveller** Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependant's educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people or circus people travelling together as such (Circular 01/2006).
- 6.18 Housing Need** A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy.
- 6.19 Housing Market Area** A geographical area which is relatively self-contained in terms of reflecting people's choice of location for a home, i.e. most people settling in the area will have sought a house only in that area.
- 6.20 Independent Examination** The process by which a planning inspector may publicly examine a Development Plan Document or a Statement of Community Involvement, before issuing a binding report. The findings set out in the report are binding upon the local authority.
- 6.21 Infill Development** Development that takes place between existing groups of buildings, normally within a built up area.
- 6.22 Infrastructure** The utilities, transport and other communication facilities and community facilities required to support housing, industrial and commercial activity, schools, shopping centres and other community and public transport services.
- 6.23 Intermediate Affordable Housing** Subsidised housing that costs less than housing available for sale or rent in the open market (whichever is the lower) but more than housing for social rent. It includes part-buy part-rent homes and housing for rent or sale at a discount.

- 6.24 Issues and Options and Preferred Options** The 'pre-submission' consultation stages on Development Plan Documents with the objective of gaining public consensus on proposals ahead of submission to Government for independent examination.
- 6.25 Listed Building** Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.
- 6.26 Local Development Document (LDD)** Sits within the LDF portfolio and comprise Development Plan Documents (DPDs) that have been subject to independent testing and have the weight of development plan status and Supplementary Planning Documents (SPDs) which are not subject to independent testing and do not have development plan status.
- 6.27 Local Development Framework (LDF)** The Local Development Framework is a portfolio, or a 'folder', of Local Development Documents which will provide the local planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development and use of land.
- 6.28 Local Development Scheme (LDS)** A public statement identifying which Local Development Documents will be produced by the Council and when.
- 6.29 Local Strategic Partnership** A Local Strategic Partnership is a single non-statutory, multi-agency body which matches local authority boundaries and aims to bring together at a local level the different parts of the public, private, community and voluntary sectors.
- 6.30 Place Shaping** The Lyons Inquiry into Local Government (Lyons 2006) set out a role for local government as the voice of a whole community and an agent of 'place'. This role includes building and shaping local identity, and making sure that the right services are provided to local people based on local needs and preferences.
- 6.31 Planning and Compulsory Purchase Act 2004** National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it. Visit www.communities.gov.uk to find out more.
- 6.32 Planning Policy Statement (PPS)/Planning Policy Guidance (PPG)** Planning Policy Statements (PPSs) (and their predecessors Planning Policy Guidance Notes) are prepared by the Government after public consultation to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. They also explain the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.
- 6.33 Previously Developed Land** Land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously developed land may occur in

both built-up and rural settings. The definition includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures.

- 6.34 Regeneration** The process of putting new life back into often derelict older urban areas through environmental improvements, comprehensive development and transport proposals.
- 6.35 Section 106 (S106)** Section 106 of the Town and Country Planning Act 1990 allows a local planning authority (LPA) to enter into a legally binding agreement or planning obligations, with a land developer over a related issue. The obligation is sometimes termed a 'Section 106 agreement'. Such agreements can cover almost any relevant issue and can include sums of money. An example of S106 agreements could be that a developer will build a community meeting place on a development site, or the developer will make a financial contribution for transport improvements.
- S106 agreements can act as a main instrument for placing restrictions on developers, often requiring them to minimise the impact on the local community and to carry out tasks which will provide community benefits.
- 6.36 Sequential approach/sequential test** A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.
- 6.37 Social Rented Housing** Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant (Annex B PPS3).
- 6.38 Spatial Planning** Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. They will include policies which can impact on land use, for example by influencing the demands on, or need for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.
- 6.39 Stakeholder** A person, group, company, association, etc. with an economic, professional or community interest in the borough or a specific part of it, or that is affected by local developments.
- 6.40 Statement of Community Involvement (SCI)** The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.
- 6.41 Strategic Environmental Appraisal (SEA)** A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes.

- 6.42 Strategic Flood Risk Assessment (SFRA)** An assessment usually undertaken by a Local Authority at a borough-wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with Planning Policy Statement 25.
- 6.43 Strategic Housing Land Availability Assessment (SHLAA)** A study aimed at identifying sites with potential for housing, assessing their housing potential and assessing when they are likely to be developed.
- 6.44 Strategic Housing Market Assessment (SHMA)** A study aimed at assessing the need and demand for housing within a housing market area.
- 6.45 Sustainability Appraisal (SA)** Sustainability Appraisal is a systematic and iterative appraisal process, incorporating the requirements of the European Strategic Environmental Assessment Directive. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process.
- 6.46 Sustainable Community Strategy (SCS)** The Sustainable Community Strategy has been prepared by Lewisham's Local Strategic Partnership and is a document which sets out how the Vision and priorities for Lewisham will be achieved. The Core Strategy is the spatial interpretation of the SCS.
- 6.47 Supplementary Planning Document (SPD)** A Local Development Document that has not been subject to independent testing and does not have the weight of development plan status. SPDs replace Supplementary Planning Guidance that was part of the old planning system. Helps to amplify the policies contained in Development Plan Documents.
- 6.48 Sustainable Drainage Systems (SUDS)** Physical structures designed to receive surface water runoff in order to reduce the negative impact of development on the water environment. They can usually be incorporated into the planted or paved area of the development.
- 6.49 Waste** Material is waste if, when disposing of it or having it disposed of on his behalf, the producer intends to discard it or throw it away. Even if the material is reusable, if it is discarded it is still waste. It is the original producer's intention that determines if a material is waste. Waste is generally referred to as being either controlled or uncontrolled. Controlled waste consists of household, commercial and industrial waste and falls within the scope of waste regulation and environmental protection legislation. Uncontrolled waste consists of radioactive waste, explosive waste, mines and quarries waste and agricultural waste and is regulated by other legislation.

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