

# Sustainability Appraisal of the Lewisham Town Centre Area Action Plan

**Sustainability Appraisal - Proposed  
Submission Version**

January 2012

*Prepared for*

London Borough of Lewisham

*Prepared by*



Anne Hugh-White  
Senior Sustainability Consultant

209-215 Blackfriars Road  
London  
SE1 8NL  
UK

**T** 0207 803 2600

**F** 0207 803 2601

# Document Control Sheet

Project Title            Lewisham Town Centre Area Action Plan

Report Title            Sustainability Appraisal of the Lewisham Town Centre Area Action  
Plan Proposed Submission Version

                                  Doc Ref No: 1039631/R/001

Revision                3

Status                  Final

Control Date            January 2012

## Record of Issue

Issue	Status	Author	Date	Check	Date	Authorised	Date
1	Draft	A. Hugh White	19.12.11	F. Symes	20.12.11	F. Symes	20.12.11
2	Draft	A. Hugh White	30.12.11	F. Symes	04.01.12	F. Symes	04.01.12
3	Final	A.Hugh White	10.01.12	F. Symes	11.01.12	F. Symes	11.01.12

## Distribution

Organisation	Contact	Copies
London Borough of Lewisham	Matthew Pullen	1 (e)
London Borough of Lewisham	Brian Regan	1 (e)

*This Report has been prepared for the London Borough of Lewisham in respect of the Sustainability Appraisal of the Lewisham Town Centre Area Action Plan and may not be used or relied on by any other person or by the client in relation to any other matters not covered specifically by the scope of this Report.*

*Notwithstanding anything to the contrary contained in the Report, Mouchel Limited is obliged to exercise reasonable skill, care and diligence in the performance of the services required by the London Borough of Lewisham and Mouchel Limited shall not be liable except to the extent that it has failed to exercise reasonable skill, care and diligence, and this report shall be read and construed accordingly.*

*This Report has been prepared by Mouchel Limited. No individual is personally liable in connection with the preparation of this Report. By receiving this Report and acting on it, the client or any other person accepts that no individual is personally liable whether in contract, tort, for breach of statutory duty or otherwise.*

# Contents

<b>Document Control Sheet</b> .....	<b>i</b>
<b>Contents</b> .....	<b>iii</b>
<b>Table of figures</b> .....	<b>v</b>
<b>Tables</b> .....	<b>vi</b>
<b>1 Non technical Summary</b> .....	<b>3</b>
<b>2 Introduction and Methodology</b> .....	<b>12</b>
2.1 Introduction.....	12
2.2 SEA Directive .....	14
2.3 Sustainability Appraisal .....	17
2.4 Next Steps.....	23
2.5 Equalities Analysis Assessment.....	24
2.6 The Habitat Regulations Assessment (HRA) .....	24
<b>3 Background</b> .....	<b>25</b>
3.1 Purpose of the SEA.....	25
3.2 Lewisham Area Action Plan Context .....	25
<b>4 SEA Objectives and Baseline and Context</b> .....	<b>30</b>
4.1 Links to Other International, National, Regional, Local Plans and Programmes.	30
4.2 Principal legislative and policy changes .....	35
4.3 Current and Predicted Future Social, Environmental and Economic Baseline Characteristics .....	37

4.4	Sustainability Appraisal Objectives, Targets and Indicators.....	43
<b>5</b>	<b>AAP Options and Alternatives .....</b>	<b>49</b>
5.1	Main Strategic Alternatives Considered and How They Were Identified.....	49
5.2	Preferred Options .....	66
5.3	Consultation on Preferred Options .....	72
5.4	Town Centre Area Action Plan Further Options Report .....	72
5.5	Town Centre Area Action Plan Further Options .....	73
5.6	Significant environmental effects of the policies and proposals .....	73
5.7	Significant environmental effects of the AAP Area Proposed Submission Version 77	
5.8	Equalities Analysis Assessment.....	85
5.1	The Habitat Regulations Assessment (HRA) .....	85
5.2	Cumulative and long term effects.....	87
5.3	SA Report AAP Further Options Consultation Responses.....	89
5.4	Proposed Mitigation Measures.....	95
<b>6</b>	<b>Implementation Monitoring .....</b>	<b>108</b>
6.1	Links to Other Tiers of Plans and Programmes and the Project Level.....	108

## Table of figures

Figure 3-1 Lewisham in Context <sup>xii</sup> .....	26
Figure 3-2 Lewisham Town Centre Area Action Plan <sup>xii</sup> .....	27

## Tables

Table 1-1 SA Reports and AAP Consultation Periods.....	6
Table 2-1 SA Reports and AAP Consultation Periods.....	12
Table 2-2 SEA Directive Requirements.....	14
Table 2-3 DCLG Guidance Stage.....	17
Table 4-1 Plans Policies and Programmes.....	30
Table 4-2 Key Sustainability Issues.....	38
Table 4-3 Sustainability Appraisal Objectives.....	44
Table 4-4 SA Appraisal of the AAP Objectives.....	47
Table 5-1 Housing LTC1 A, B, C –Options/Alternatives Initial Sustainability Commentary .....	50
Table 5-2 Housing LTC2 A, B, C - Options/Alternatives Initial Sustainability Commentary .....	51
Table 5-3 Housing LCT3 A, B, C - Options/Alternatives Initial Sustainability Commentary .....	52
Table 5-4 Housing LCT4 A, B, C- Options/Alternatives Initial Sustainability Commentary .....	53
Table 5-5 Retail and Town Centres LTC5 A, B - Options/Alternatives Initial Sustainability Commentary.....	54
Table 5-6 Retail and Town Centres LTC6 A, B, C, D, E, F, G H - Options/Alternatives Initial Sustainability Commentary.....	55
Table 5-7 Retail and Town Centres LTC7 A, B, C, D - Options/Alternatives Initial Sustainability Commentary.....	56
Table 5-8 Retail and Town Centres LTC8 A, B, C, D - Options/Alternatives Initial Sustainability Commentary.....	57
Table 5-9 Retail and Town Centres LTC9 A, B, C, D - Options/Alternatives Initial Sustainability Commentary.....	58
Table 5-10 Retail and Town Centres LTC10 A, B - Options/Alternatives Initial Sustainability Commentary.....	59
Table 5-11 Urban Design LTC11 A, B, C, D - Options/Alternatives Initial Sustainability Commentary.....	60
Table 5-12 Employment and Business Issues LTC12 A, B, C, D - Options/Alternatives Initial Sustainability Commentary.....	61
Table 5-13 Open Space LTC13 A, B, C, D - Options/Alternatives Initial Sustainability Commentary.....	62

Table 5-14 Transport LTC14 6 A, B, C - Options/Alternatives Initial Sustainability Commentary .....	63
Table 5-15 Transport LTC15 A, B, C - Options/Alternatives Initial Sustainability Commentary .....	64
Table 5-16 LTC16 A, B - Options/Alternatives Initial Sustainability Commentary .....	65
Table 5-17 Draft PO Thematic Policies .....	66
Table 5-18 Draft Opportunity Area Policies .....	68
Table 5-19 – Preferred Options - Predicted Effects, Objectives Affected, and Proposed Mitigation Measures .....	71
Table 5-20 Key Matrix Scores .....	74
Table 5-21 Key .....	78
Table 5-22 New Policy Appraisals .....	80
Table 5-23 SA Report AAP Further Options Consultation Responses Environmental Agency .....	90
Table 5-24 SA Report AAP Further Options Consultation Responses English Heritage	93
Table 5-25 Mitigation Approach.....	95
Table 5-26 Mitigation and Where Addressed within the AAP .....	97
Table 6-1 Monitoring.....	110



## Abbreviations

AA	Appropriate Assessment
AAP	Area Action Plan
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CAZ	Central Activity Zone
CD&E	Construction, Demolition & Excavation Waste
CHP	Combined Heat and Power
C & I	Commercial & Industrial Waste
CSR	Corporate Social Responsibility
DCLG	Department for Communities and Local Government (formerly ODPM)
DEFRA	Department for Fisheries and Rural Affairs
DPD	Development Plan Document
DLR	Docklands Light Railway
EC	European Community
EIA	Environmental Impact Assessment
EMS	Environmental Management System
EAA	Equalities Analysis Assessment
ER	Environmental Report
EU	European Union
GHG	Green House Gas
GIS	Geographical Information System
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
LBL	London Borough of Lewisham Council
LDF	Local Development Framework
LDS	Local Development Scheme
LEL	Local Employment Location
LEZ	Low Emission Zone
LNR	Local Nature Reserve
LPA	Local Planning Authority
LA	Local Authority
MSW	Municipal Solid Waste

NHS	National Health Service
NO2	Nitrogen Dioxide
ODPM	Office of the Deputy Prime Minister (replaced by DCLG)
PPP	Policies, Plans and Programmes
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled of Ancient Monument
SAP	Sustainability Appraisal Panel
SEA	Strategic Environmental Assessment
SF	Sustainability Framework
SFRA	Strategic Flood Risk Assessment
SINC	Site of Importance Nature Conservation
SPA	Special Protected Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems
SWMP	Site Waste Management Plan
SWMP	Surface Water Management Plan
TIA	Transport Impact Assessment
UDP	Unitary Development Plan
UK	United Kingdom

# 1 Non technical Summary

This report has been prepared by Mouchel for the London Borough of Lewisham to support the development of the Lewisham Town Centre Area Action Plan.

This document is the Sustainability Appraisal and the Strategic Environmental Assessment of the Lewisham Town Centre Area Action Plan Proposed Submission Version. This Report has been produced following consultation on the Sustainability Appraisal of the Area Action Plan Further Options Report (November 2010).

Local Development Frameworks were introduced through the 2004 Planning and Compulsory Purchase Act. Local Development Framework is a generic term to describe a portfolio of planning documents, prepared by the Council, which collectively will deliver the planning strategy for the Local Authority, which in this case is Lewisham. Area Action Plans, like this one being prepared for Lewisham Town Centre, are Development Plan Documents. Development Plan Documents are one of a number of types of Local Development Documents that make up the Local Development Frameworks.

All local authorities must produce Core Strategy Development Plan Documents as part of their Local Development Documents which sets out the strategic planning direction for the area. Further to this, additional Development Plan Documents can be produced to set out policies in more detail. In Lewisham the following documents have been or are currently being prepared:

- Core Strategy - Adopted June 2011
- Site Allocations Development Plan Document
- Development Management Policies Development Plan Document
- Area Action Plans for the Lewisham and Catford town centres
- Proposals Map
- Supplementary Planning Documents
- Statement of Community Involvement – Adopted July 2006
- Annual Monitoring Report – Latest version 2010/2011
- Local Development Scheme – Version 5 adopted September 2010

The London Borough of Lewisham has been actively engaged in developing its Local Development Documents since 2005.

The London Borough of Lewisham Council is preparing an Area Action Plan for Lewisham Town Centre to ensure the forecast growth for the town centre is managed and delivered. Spatial Policy 2 of the adopted Core Strategy sets out the following vision for the town centre:

Lewisham Town Centre will:

- a. Be designated as a Major town centre, and will be further developed so that by 2026 it achieves Metropolitan status on the London-wide retail hierarchy.
- b. Accommodate up to 40,000 sq.m of additional retail floor space and 4,300 sq.m of additional leisure floor space by 2026.
- c. Accommodate up to 2,300 new homes by 2016 and a further 800 additional new homes by 2021 (NB: These figures have been updated at each stage of the AAP production to reflect reality")
- d. Contain a Local Employment Location at Molesworth Street.
- e. Be one of the borough's preferred locations for new office development.
- f. Contain a strategic development site, the Lewisham Gateway, which will act as a catalyst for regeneration of the town centre.

The AAP is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major development sites within the town centre.

The Area Action Plan is at the heart of regenerating the town centre. It provides a vision and a number of objectives for the area, supported by a suite of policies, guidance and a delivery plan. The Area Action Plan will demonstrate what is required to redevelop the area into a vibrant and successful centre, including improvements to shopping, living, working, and spending leisure time in the town centre. Further, the Area Action Plan will ensure individual developments support the town centre wide objectives, are well designed and environmentally smart.

Lewisham Town Centre is situated in the London Borough of Lewisham and is especially well connected to central London by rail and the Docklands Light Railway and benefits from high Public Transport Accessibility Level of 6b and 6a<sup>1</sup>. It is also

---

<sup>1</sup> Public Transport Accessibility Level - Grade from 1-6 (including sub-divisions 1a, 1b, 6a and 6b), where a PTAL of 1a indicates extremely poor access to the location by public transport, and a PTAL of 6b indicates excellent access by public transport.

sited on key radial and orbital roads providing it with easy access to both central London and the Kent countryside and coast. It is designated by the Mayor of London as a Major Town Centre and is the largest centre in the borough.

The Lewisham Town Centre Area Action Plan is subject to a Sustainability Appraisal. Sustainability Appraisals must, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/42/EC).

Guidance issued in November 2005 by the Office of the Deputy Prime Minister (now superseded by the Department for Communities and Local Government) states that “The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plans”.

This process is intended to ensure that planning decisions are made that accord with the principles defined in the government’s United Kingdom Sustainable Development agenda. The timing of the Sustainability Appraisal in the plan making process is aimed at ensuring that sustainability considerations are taken into account early in the process of policy development.

The Strategic Environmental Assessment Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into United Kingdom law through the Strategic Environmental Assessment Regulations (July 2004).

This report is designed to meet the requirements of an “Environmental Report” as defined in the Directive and as set out in UK government guidance on Sustainability Appraisal.

The Area Action Plan and the Sustainability Appraisal have been developed over several years and through a number of stages, each involving extensive consultation. The following

Table 1-1 shows previous Sustainability Appraisal Reports and the Area Action Plan reports and includes the consultation period for each.

Table 1-1 SA Reports and AAP Consultation Periods

Sustainability Appraisal Reports	Area Action Plan	Consultation Period
Sustainability Appraisal Scoping Report 2005 (Lewisham Borough Council)	Area Action Plan Issues and Options Report 2005 (Lewisham Borough Council)	Scoping Report 16 <sup>th</sup> May 2005 – 20 <sup>th</sup> June 2005 (the issues and options documents were consulted on separately between May and November 2005)
Sustainability Appraisal Preferred Options Report 2007 (Faber Maunsell / AECOM)	Area Action Plan Preferred Options Report 2007 (Lewisham Borough Council)	17 <sup>th</sup> August 2007 – 28 <sup>th</sup> Sept 2007 (alongside the AAP Preferred Options)
Sustainability Appraisal Revised Scoping Report 2010 (Lewisham Borough Council)	N/A	12 <sup>th</sup> Nov 2010 – 6 <sup>th</sup> December 2010
Sustainability Appraisal Further Options Report Nov 2010 (Urban Practitioners)	Area Action Plan Further Options Report Nov 2010 (Lewisham Borough Council)	21 <sup>st</sup> March 2011 – 3 <sup>rd</sup> May 2011 (alongside the AAP Further Options)
Sustainability Appraisal Proposed Submission Report Jan 2012 (Mouchel Ltd)	Area Action Plan Proposed Submission Jan 2012 Lewisham Borough Council)	Planned to be March / April 2012

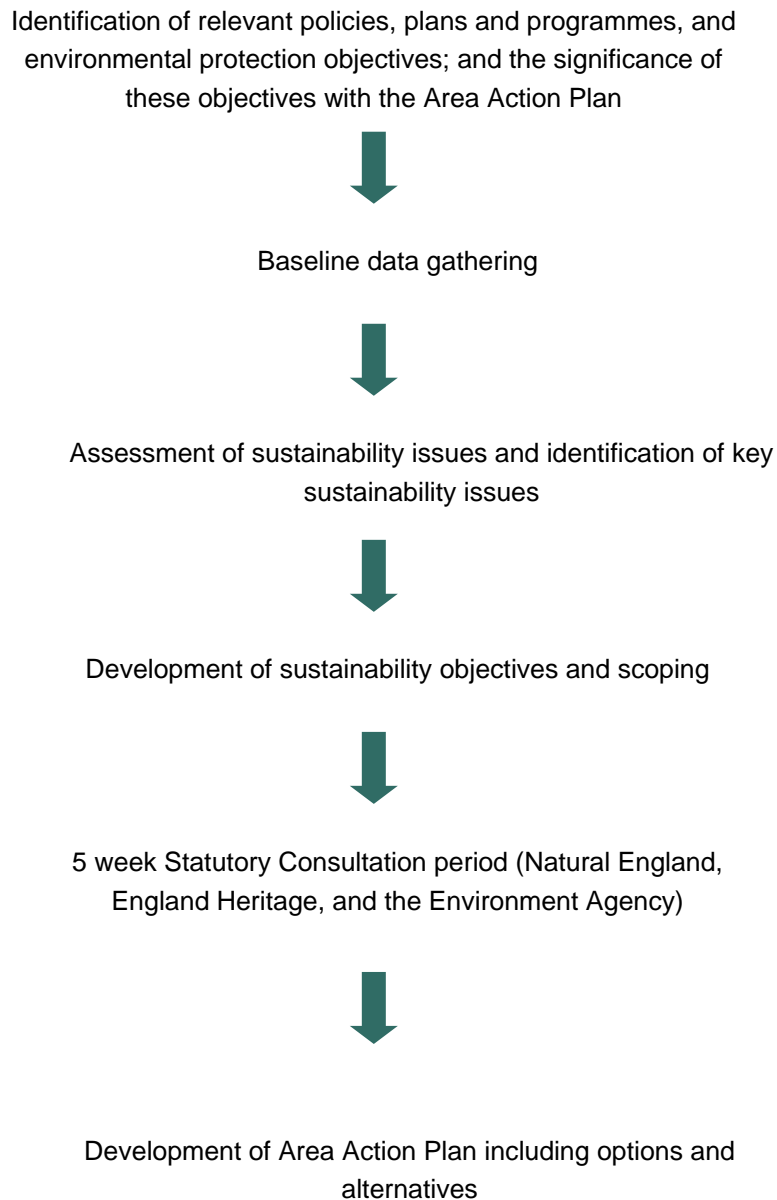
The approach and the format of the Sustainability Appraisal Report follow best practice and guidance on Strategic Environmental Assessment and Sustainability Appraisal produced by government organisations and statutory authorities.

The approach adopted for the Sustainability Appraisal was iterative and involved a high degree of interaction between those individuals responsible for the appraisal and those individuals responsible for development of the Plan as well as consultation with stakeholders as summarised in the table above. A variety of consultation methods were used throughout the process including steering group meetings; the Lewisham Town Centre Walking Audit Event; Lewisham Information Day (Questionnaire); stakeholder meetings with Councillors, Council Officers, Landowners, the Lewisham Association of Street Traders, the voluntary sector and other key local representatives; publishing the study through articles in local newsletters, holding workshops for groups such as Primary Care Trust staff, making visits to groups such as tenants and residents associations; devising a school based programme which ran throughout one week; undertaking one-to-one interviews and making questionnaires available where people did not have time to have a discussion or workshop.

A series of consultation events have taken place leading up to, and as part of the Issues and Options stage (2005) and the Preferred Options stage (2007).

Consultation has included a range of techniques including workshops, exhibitions, written consultation, newsletters, online publications, stakeholder meetings and questionnaires.

The flow chart below summarises the stages in the Sustainability appraisal process:



The Preferred Options Report suggested policy options to correspond to the identified issues and Preferred Options covering the following themes:

- Housing
- Shopping and town centre



- Urban design
- Employment and business
- Open space
- Transport
- Environment
- Community and leisure
- Implementation

The Sustainability Appraisal assisted with the development of the preferred options and associated policies; the likely significant effects on the environment of the Area Action Plan including short, medium and long term-effects, permanent and temporary effects, and secondary, cumulative and synergistic effects was identified through the use of Sustainability Appraisal matrices.

The Sustainability Appraisal highlighted predicted significant negative effects of the plan policies in relation to:

- Noise pollution; and
- Waste minimisation.

Additional negative effects of the plan policies have been predicted in relation to:

- Water use;
- Air Quality; and
- Employment.

Key areas of feedback from consultation included:

- Comments on the scope of the Area Action Plan and overlap with other documents in the LDF including the Core Strategy. For example, the lack of a specific policy position on affordable housing within the Lewisham Town Centre Area Action Plan.
- There is potential to include a Lewisham town centre specific flooding policy.
- Clarification is required in relation to the delivery and implementation of the key sites, many of which are coming forward as schemes, or benefit (in part at least) from planning consents.

- Objections to what is perceived as a relaxed approach to employment land and Metropolitan Open Land.
- Opportunities for decentralised energy networks and de-centralised power need to be investigated further as the AAP progresses.
- Sites policies are considered to be over-prescriptive by some consultees. In addition, there was an objection in relation to the use of the term 'Opportunity Area' which is already established in policy terms at the sub-regional scale.
- Requests to review the approach to Conington Road, Engate Street and the Lewisham Centre.
- Update references to Lewisham Gateway scheme which now has consent.
- Greater detail sought in relation to the approach to developer contributions in Lewisham which is now set out in the Planning Obligations SPD. Specific requirements on a site by site basis will be set out in the AAP.
- Need to strengthen the approach to the evening economy.
- A number of specific and detailed objections or statements of aspiration in relation to the Lewisham Gateway scheme.

Strategic Environmental Assessment / Sustainability Appraisal is an iterative process and following revised Government guidance and more detailed work on other Local Development Documents, including the Core Strategy, it was decided that the Area Action Plan should be more focused on addressing specific town centre issues.

A Further Options Report was produced by Urban Practitioners: Lewisham Town Centre Area Action Plan Further Options Report March 2011 and the Sustainability Appraisal Report 2010.

Within this report the number of draft policies were reduced to ensure that the AAP had an appropriate scope and focused on town centre specific issues only. The reduced scope does not mean that topics that have been left out are no longer important; it means that these topics are adequately addressed in other parts of the DPD or the Core Strategy.

Further Options Report Sustainability Appraisal was consulted on alongside the Area Action Plan Further Options Report. Following consultation additional policies have been included within the Area Action Plan Proposed Submission Version these include:

- Policy LAAP19: Student Housing
- Policy LAAP19: Tall Buildings

- Policy LAAP23: Heritage assets
- Policy LAAP25: Adapting to climate change

These new policies were also assessed against Sustainability Appraisal objectives in 2011 / 2012. The incorporation of these new policies assisted with mitigating the potential negative impacts that had been identified at earlier stages of development of the Area Action Plan.

The Sustainability Appraisal highlighted predicted negative effects of the revised plan policies in relation to:

- Possible conflicts with heritage assets and the historical environment may occur with the construction of new developments and tall buildings;
- Increased population density may lead to increased levels of crime;
- Construction will increase as will temporary construction traffic, leading to temporary negative impacts on air quality, resource use;
- Development situated within Flood Zone 3a scores negatively towards many environmental objectives and may impact the economy long term depending on how it is implemented;
- Resource use with increase.

Predicted negative effects have been identified through-out the development of the Area Action Plan; mitigation recommendations have been made and incorporated into the Area Action Plan in the form of policies. This report sets out the mitigation identified and which policies will ensure that the mitigation is addressed to ensure sustainable development is achieved.

The Directive requires that the significant environmental effects of implementing a plan or programme should be monitored “in order to identify unforeseen adverse effects and to be able to undertake remedial action”. Responsible authorities must ensure when designing their monitoring arrangements that they comply with this provision.

This report summarises the process completed to date and, in addition, sets out a proposed list of monitoring activities currently being considered by the Boroughs for the Plan. Some of which have already been incorporated into the Plan. The list of monitoring activities, the responsibilities for monitoring, and the arrangements for dealing with any unforeseen effects of implementation of the Plan; will be finalised following examination.

A Habitats Regulations Assessment screening report was undertaken in January 2012 on the Lewisham Site Allocations Development Plan Document and the

Lewisham Town Centre Area Action Plan at pre-submission stage, in compliance with the Habitats Directive (92/43/EEC) and the Regulations.

There are no designated European sites within the London Borough of Lewisham. Through consultation with Natural England, the European sites assessed were those located within a 15 kilometre radius of the borough boundary as they were considered to be in close enough proximity to *potentially* be impacted. The report identifies Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation (SAC) and the Lee Valley Special Protection Area (SPA) (the Natura 2000 sites) for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors were presented. The report provides details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that a site allocation or policy set out in the proposed submission plans, would have on the European sites. This includes in combination and cumulative effects.

The screening report observes that none of the site allocations or policies in either plan at pre-submission stage, on their own or in combination with other plans or projects, are likely to result in significant adverse impacts on European Sites. In particular, the proposed site allocations and policies are unlikely to result in a significant effect on the primary reasons for the designation of the European Sites and there is therefore no need to undertake Task 2 and Task 3 of the Habitats Regulations process. The report's conclusions were supported by Natural England.

## 2 Introduction and Methodology

### 2.1 Introduction

This report has been prepared by Mouchel for the London Borough of Lewisham to support the development of the Lewisham Town Centre Area Action Plan (AAP).

This document is the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) of the Lewisham Town Centre Area Action Plan (AAP) Proposed Submission Version.

This Report has been produced following consultation of the SA of the AAP Further Options Report November 2010<sup>i</sup>.

Table 2-1 below shows all previous SA Reports and AAP Reports and the consultation period for each.

Table 2-1 SA Reports and AAP Consultation Periods

Sustainability Appraisal Reports	Area Action Plan	Consultation Period
Sustainability Appraisal Scoping Report 2005 (Lewisham Borough Council)	Area Action Plan Issues and Options Report 2005 (Lewisham Borough Council)	Scoping Report 16 <sup>th</sup> May 2005 – 20 <sup>th</sup> June 2005 (the issues and options documents were consulted on separately between May and November 2005)
Sustainability Appraisal Preferred Options Report 2007 (Faber Maunsell / AECOM)	Area Action Plan Preferred Options Report 2007 (Lewisham Borough Council)	17 <sup>th</sup> August 2007 – 28 <sup>th</sup> Sept 2007 (alongside the AAP Preferred Options)
Sustainability Appraisal Revised Scoping Report 2010 (Lewisham Borough Council)	N/A	12 <sup>th</sup> Nov 2010 – 6 <sup>th</sup> December 2010
Sustainability Appraisal Further Options Report Nov 2010 (Urban Practitioners)	Area Action Plan Further Options Report Nov 2010 (Lewisham Borough Council)	21 <sup>st</sup> March 2011 – 3 <sup>rd</sup> May 2011 (alongside the AAP Further Options)
Sustainability Appraisal Proposed Submission Report Jan 2012 (Mouchel Ltd)	Area Action Plan Proposed Submission Jan 2012 Lewisham Borough Council)	Planned to be March / April 2012

#### 2.1.1 Local Development Framework

Local Development Frameworks (LDF) were introduced through the 2004 Planning and Compulsory Purchase Act and is a generic term to describe a portfolio of

planning documents, prepared by the Council, which collectively will deliver the planning strategy for Lewisham. Area Action Plans, like this one being prepared for Lewisham Town Centre, are Development Plan Documents (DPDs). Development Plan Documents are one of a number of types of Local Development Documents that make up the LDFs. All local authorities must produce a Core Strategy DPD as part of their LDF which sets out the strategic planning direction for the area. Further to this, additional DPDs can be produced to set out policies in more detail. In Lewisham the following documents have been or are currently being prepared:

- Core Strategy - Adopted June 2011
- Site Allocations DPD
- Development Management Policies DPD
- Area Action Plans for the Lewisham and Catford town centres
- Proposals Map
- Supplementary Planning Documents (SPD)
- Statement of Community Involvement (SCI) – Adopted July 2006
- Annual Monitoring Report (AMR) – Latest version 2010/2011
- Local Development Scheme (LDS) – Version 5 adopted September 2010

The London Borough of Lewisham has been actively engaged in developing its LDF since 2005.

#### 2.1.2 *Lewisham Town Centre Area Action Plan*

London Borough of Lewisham Council (LBL) are preparing an AAP for Lewisham Town Centre to ensure the forecast growth for the town centre is managed and delivered. Spatial Policy 2 of the adopted Core Strategy<sup>ii</sup> sets out the following vision for the town centre:

Lewisham Town Centre will:

- a. Be designated as a Major town centre, and will be further developed so that by 2026 it achieves Metropolitan status on the London-wide retail hierarchy.
- b. Accommodate up to 40,000 sq.m of additional retail floor space and 4,300 sq.m of additional leisure floodspace by 2026.
- c. Accommodate up to 2,300 new homes by 2016 and a further 800 additional new homes by 2021 (NB: These figures have been updated at each stage of the AAP production to reflect reality”)

- d. Contain a Local Employment Location (LEL) at Molesworth Street.
- e. Be one of the borough’s preferred locations for new office development.
- f. Contain a strategic development site, the Lewisham Gateway, which will act as a catalyst for regeneration of the town centre.

The AAP is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major opportunity sites within the town centre.

**2.2 SEA Directive**

Sustainability Appraisals must, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/42/EC) (SEA Directive)<sup>iii</sup>. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into UK law through the SEA Regulations (July 2004). Table 2-2 outlines the SEA Directive Requirements and how these requirements have been addressed within this report.

Table 2-2 SEA Directive Requirements

SEA Directive Requirements	How addressed
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	Sustainability Appraisal Further Options Report Nov 2010 (Urban Practitioners)  And  Sustainability Appraisal Proposed Submission Report Jan 2012 (Mouchel Ltd)
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 3 and 4.1 to 4.2.5 of this report contains this information
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Sustainability Appraisal Preferred Options Report 2007 (Faber Maunsell / AECOM)  (Table 8: Predicted effects of ‘do nothing/Business as usual scenario)  And  Sustainability Appraisal Revised Scoping Report 2010 (Lewisham Borough Council) identifies the baseline and current state of the environment.

SEA Directive Requirements	How addressed
<p>c) The environmental characteristics of areas likely to be significantly affected;</p>	<p>Sustainability Appraisal Revised Scoping Report 2010 (Lewisham Borough Council) identifies the baseline and current state of the environment.</p> <p>Table 4-2 of this SA Report identifies the key issues</p>
<p>d) Any existing environmental problems which are relevant to the plan programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p>	<p>Sustainability Appraisal Revised Scoping Report 2010 (Lewisham Borough Council) identifies the baseline and current state of the environment.</p> <p>Table 4-2 of this SA Report identifies the key issues</p> <p>Habitats Regulations Assessment – see section 5.1 of this report.</p>
<p>e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;</p>	<p>Sustainability Appraisal Further Options Report Nov 2010 (Urban Practitioners)</p> <p>Appendix 3: Plans, programmes and objectives</p> <p>Table 4-1 of this SA Report summarises this information.</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p>Sustainability Appraisal Further Options Report Nov 2010 (Urban Practitioners)</p> <p>And</p> <p>Section 5 of this SA Report</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>Table 5-26</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>The process of options identification and preferred options selection is discussed within the Lewisham Town Centre Area Action Plan Further Options Report March 2011xii</p>
<p>i) A description of measures envisaged concerning monitoring in accordance with Article 10;</p>	<p>Table 6-1</p>



SEA Directive Requirements	How addressed
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p> <p>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</p>	<p>The Statement of Consultation<sup>iv</sup> gives full detail of all consultation undertaken throughout the process.</p> <p>Table 5-23 and</p> <p>Table 5-24 highlight all consultation comments received on the SA Further Options Report and how they have been addressed.</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</p>	<p>N/A</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p>	<p>The Statement of Consultation<sup>iv</sup> gives full detail of all consultation undertaken throughout the process.</p> <p>Table 5-23 and</p> <p>Table 5-24 highlight all consultation comments received on the SA Further Options Report and how they have been addressed.</p>
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted;</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art. 9 and 10).</p>	<p>To be confirmed following examination</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	<p>To be confirmed following examination</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This table identifies how the requirements have been met.</p>

## 2.3 Sustainability Appraisal

Guidance issued in November 2005 by the Office of the Deputy Prime Minister (ODPM – now superseded by the Department for Communities and Local Government, DCLG) <sup>v</sup> states that “The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plans”.

This process is intended to ensure that planning decisions are made that accord with the principles defined in the government’s UK Sustainable Development agenda. The timing of the SA in the plan making process is aimed at ensuring that sustainability considerations are taken into account early in the process of policy development. Table 2-3 outlines the SA DCLG Guidance Stages.

Table 2-3 DCLG Guidance Stage

DPD Stage 1: Pre-Production – Evidence Gathering
<b>SA Stages and Tasks</b>
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>• <b>A1:</b> Identifying other relevant policies, plans and programmes, and sustainability objectives.</li> <li>• <b>A2:</b> Collecting baseline information.</li> <li>• <b>A3:</b> Identifying sustainability issues and problems.</li> <li>• <b>A4:</b> Developing the SA framework.</li> <li>• <b>A5:</b> Consulting on the scope of the SA.</li> </ul>
DPD Stage 2: Production
<b>SA Stages and Tasks</b>
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>• <b>B1:</b> Testing the DPD objectives against the SA framework.</li> <li>• <b>B2:</b> Developing the DPD options.</li> <li>• <b>B3:</b> Predicting the effects of the DPD.</li> <li>• <b>B4:</b> Evaluating the effects of the DPD.</li> <li>• <b>B5:</b> Considering ways of mitigating adverse effects and maximising beneficial effects.</li> <li>• <b>B6:</b> Proposing measures to monitor the significant effects of implementing the DPDs.</li> </ul>
<p><b>Stage C: Preparing the Sustainability Report</b></p> <ul style="list-style-type: none"> <li>• <b>C1:</b> Preparing the SA Report.</li> </ul>
<p><b>Stage D: Consulting on the preferred options of the DPD and SA Report</b></p> <ul style="list-style-type: none"> <li>• <b>D1:</b> Public participation on the preferred option of the DPD and the SA Report.</li> <li>• <b>D2(i):</b> Appraising significant changes</li> </ul>
DPD Stage 3: Examination
<b>SA Stages and Tasks</b>
<ul style="list-style-type: none"> <li>• <b>D2(ii):</b> Appraising significant changes resulting from representations.</li> </ul>

<b>DPD Stage 4: Adoption and monitoring</b>
<b>SA Stages and Tasks</b>
<ul style="list-style-type: none"> <li>• <b>D3:</b> Making decisions and providing information.</li> </ul>
<b>Stage E: Monitoring the significant effects of implementing the DPD</b>
<ul style="list-style-type: none"> <li>• <b>E1:</b> Finalising aims and methods for monitoring.</li> <li>• <b>E2:</b> Responding to adverse effects.</li> </ul>

### 2.3.1 SA Approach

The SA process needs to be fully integrated into the planning system to ensure that conclusions from the appraisal inform planning decisions. In order to assist with this process, the ODPM guidance needs to be read in conjunction with The Planning and Compulsory Purchase Act 2004, the SEA Directive, the Local Development Regulations, the Regional Development Regulations, the SEA Regulations, and planning guidance, particularly PPS 1: Delivering Sustainable Development and PPS 12: Local Development Frameworks.

An Environmental Report may be included within a document covering effects other than those on the environment, for example as part of a Sustainability Appraisal. Where this is done, the document must clearly show that the Directive's requirements in relation to the Environmental Report have been met. Table 2-2 shows how these requirements have been met.

The following Section outlines the DCLG SA stages and tasks (see Table 2-3), indicates how the process was undertaken for the AAP, and identifies which previous report was issued for consultation and when and identifies which section of this report provides relevant evidence. This Section is structured with specific reference to DCLG guidance on SA and, where appropriate, references the SEA Directive.

Urban Practitioners, on behalf of LBL, consulted on the "Lewisham Town Centre Development Strategy" (August 2004). Consultation was undertaken with key stakeholders through processes such as steering group meetings; the Lewisham Town Centre Walking Audit Event; Lewisham Information Day (Questionnaire); and stakeholder meetings with Councillors, Council Officers, Landowners, the Lewisham Association of Street Traders, the voluntary sector and other key local representatives.

A consultation process was also undertaken for 'Urban Renaissance Lewisham: Health and Social Impact Assessment', March 2004<sup>vi</sup>. The stakeholders consulted were defined by the following categories: strategic, service providers, local residents, transient and whole population. A range of approaches was adopted to engage people in the evidence gathering. The methods included: publishing the study through articles in local newsletters, holding workshops for groups such as Primary Care Trust staff, making visits to groups such as tenants and residents associations,

devising a school based programme which ran throughout one week, undertaking one-to-one interviews and making questionnaires available where people did not have time to have a discussion or workshop.

A series of consultation events have taken place leading up to, and as part of the Issues and Options stage (2005) and the Preferred Options stage (2007). Consultation has included a range of techniques including workshops, exhibitions, written consultation, newsletters, online publications, stakeholder meetings and questionnaires.

The Statement of Consultation <sup>iv</sup> contains further details of the consultation process.

### **DCLG Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.**

What the SEA Directive Says: the Environmental Report shall include information on [inter alia] the *“relationship [of the plan or programme] with other relevant plans and programmes” (Annex I(a)) “the environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I (e))*

*“relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” (Annex I (b), (c))*

*“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I (d))*

*“The authorities ... which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes ... shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report” (Article 5.4 and 6.3).*

- A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.

The relevant plans, programmes and environmental protection objectives and the significance of these objectives with the AAP and the SA are discussed in the SA Report Lewisham Town Centre further options report November 2010 Appendix 3. The plans and programmes considered are summarised in Section 4 of this Report <sup>i</sup>.

- A2: Collecting baseline information.

Baseline information is set out to establish the current state of the area covered by the AAP, and to identify trends in economic, environmental and social parameters. This information is then used to assess current sustainability issues that are evident in the area. The baseline information is intended to provide a basis for predicting and monitoring the effects of implementation of the plan. It also helps to identify sustainability issues and alternative ways of dealing with them.

A Scoping Report was initially produced in 2005 and as a matter of good practice and given the time since the initial SA Scoping Report; a revised Scoping Report was issued in October 2010. The full baseline information is set out in the SA Scoping Report 2010<sup>vii</sup>.

- A3: Identifying sustainability issues and problems.

Identifying the sustainability issues and problems is an opportunity to define the key social, environmental and economic issues which needed to be taken into account when preparing the AAP. In some cases these are constraints which must be overcome, or impacts which must be avoided; in other cases these may be opportunities (e.g. stimulating the local economy and employment markets).

Key sustainability issues were also identified through researching the baseline information, taking account of the results of workshops, and through other means of correspondence.

Table 4-2 of this report summarises those key issues that the AAP area currently faces in social, economic and environmental sustainability terms.

- A4: Developing the SA framework.

The SA Framework provides a method for describing, analysing and comparing the sustainability effects of plans and policies. The Sustainability Objectives that form the SA Framework were developed and consulted on as part of the SA Scoping process taking into account the relationship between the AAP and the objectives of other plans and programmes, along with the findings of the baseline information review.

- A5: Consulting on the scope of the SA.

Views on the content of the SA Scoping Report 2005<sup>viii</sup> and the Revised Scoping Report 2010<sup>vii</sup>, including the proposed approach to the appraisal, were taken into account through a formal statutory five week consultation period with the statutory consultees, this includes: Natural England, England Heritage, and the Environment Agency, The SA Framework was refined through consultation at the scoping stage.

### **DCLG Stage B: Developing and refining options and assessing effects**

What the SEA Directive says: “*an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*” (Article 5.1). Information to be provided in the Environmental Report includes “*an outline of the reasons for selecting the alternatives dealt with*” (Annex I (h)).

*(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;*

In the UK, the term options is often referred to instead of alternatives.

- B1: Testing the DPD objectives against the SA framework.

It is important that the aims and objectives of the AAP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives to assist, where necessary, in refining the AAP aims and objectives as well as in identifying options/alternatives.

The AAP objectives were tested against the SA Framework in the form of a compatibility matrix within the SA Further Options Report 2010 this appraisal was consulted on in 2010 and no consultation responses were received (see Table 4-4).

- B2: Developing and refining options and assessing effects.

DCLG Guidance states the following: “Only **reasonable, realistic and relevant alternatives** need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each. Some alternatives are discrete, involving a choice between one alternative and another. These are often the broad options considered early in plan and programme preparation. Other alternatives can be combined in various ways. Alternatives may be grouped into scenarios, for instance rapid economic growth, ‘most sustainable’ option, etc.” (Emphasis added).

The ‘do nothing/Business as usual’ scenario option was also considered in the SA Report Preferred Options Report 2007 Table 8.<sup>ix</sup>.

- B3: Predicting the effects of the DPD and B4: Evaluating the effects of the DPD.

In developing the AAP a series of options and alternatives were produced. An initial Issues and Options Report was produced by Urban Practitioners in June 2005.<sup>x</sup> The results of this analysis were provided within the Issues and Options Report and Annex C of the Sustainability Appraisal Report of the Preferred Options April 2007<sup>xi</sup>; consultation was carried out on both of these reports. See Table 5-1 to Table 5-16 of this report for the SA of the options/alternatives.

Following consultation on the Issues and Options Report (2005) and the Initial Sustainability Appraisal a detailed range of draft policies which reflected the comprehensive coverage of the issues, options and preferred options identified by the AAP process was produced.

The AAP Preferred Options Report 2007 was produced along with a Sustainability Appraisal of these draft policies produced by Faber Maunsell / AECOM 2007<sup>ix</sup>. This report has been included as Appendix B of this report.

Section 5 of this report discusses the reasons for choosing the Preferred Options and the likely significant effects on the environment of the AAP including short, medium and long term-effects, permanent and temporary effects, and secondary, cumulative and synergistic effects.

Strategic Environmental Assessment / Sustainability Appraisal is an iterative process and following revised Government guidance and more detailed work on other Local Development Documents, including the Core Strategy, it was decided that the AAP should be more focused on addressing specific town centre issues. Therefore a Further Options Report was produced by Urban Practitioners: Lewisham Town Centre Area Action Plan Further Options Report March 2011<sup>xii</sup> and the Sustainability Appraisal Report 2010<sup>i</sup>.

Full information on the options generation process undertaken to date is located in Appendix A of this report.

Further consultation on the Area Action Plan Further Options Report March 2011 resulted in minor changes to policy and the addition of new policies; see section 5.6.1 of this report for further detail.

- B5: Considering ways of mitigating adverse effects and maximising beneficial effects.

Annex I of the SEA Directive requires *the SEA Report to include measures to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan or programme*. For convenience, these measures are referred to in DCLG guidance as 'mitigation measures', however they include proactive avoidance of adverse effects as well as actions taken after effects are noticed.

Section 5.4 of this report includes the recommendations identified from the SA process and how these were addressed within the Plan.

- B6: Proposing measures to monitor the significant effects of implementing the DPDs.

What the Directive says: *"Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action" (Article 10.1)."*

Section 1 of this report sets out a proposed list of monitoring activities currently being considered. Monitoring arrangements will be finalised following examination in 2012.

#### **DCLG Stage C1: Reporting**

What the SEA Directive says....*"The environmental report shall include information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, [and] its stage in the decision-making process" (Article 5.2). Information to be provided in the Environmental Report includes:*

*"the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects" (Annex I (f) and footnote)*

*"an outline of the reasons for selecting the alternatives dealt with" (Annex I (h))*

*"the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme" (Annex I (g))*



### DCLG Stage D Pre- Examination

- D1: Public participation on the preferred option of the DPD and the SA Report.
- D2(i): Appraising significant changes

## 2.4 Next Steps

### DCLG Stage D: Examination

- D2 (ii): Appraising significant changes resulting from representations.

### DCLG Stage D: Adoption and monitoring

- D3: Making decisions and providing information.

### DCLG Stage E: Monitoring the significant effects of implementing the DPD

- E1: Finalising aims and methods for monitoring.
- E2: Responding to adverse effects.

## 2.5 Equalities Analysis Assessment

An Equalities Analysis Assessment has been carried out; it assessed each of the preferred options identified by the Council in the Lewisham Town Centre Area Action Plan Further Options Report against eight equalities 'target groups'. The results are summarised in section 5.8 of this report.

## 2.6 The Habitat Regulations Assessment (HRA)

A Habitats Regulations Assessment screening report was undertaken in January 2012 on the Lewisham Site Allocations Development Plan Document and the Lewisham Town Centre Area Action Plan at pre-submission stage, in compliance with the Habitats Directive (92/43/EEC) and the Regulations. See section **Error! Reference source not found.** for full details.

## 3 Background

### 3.1 Purpose of the SEA

The purpose of the SEA Directive is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.

### 3.2 Lewisham Area Action Plan Context

Lewisham’s adopted Core Strategy DPD<sup>ii</sup> sets out a spatial strategy for the whole of the Borough. Spatial Policy 2 identifies Lewisham Town centre as a Regeneration and Growth Area and the Lewisham Gateway Site as one of five Strategic Sites that are considered to be central to the achievement of the Strategy. It also aims to ensure that by 2026 the town centre achieves Metropolitan status, accommodates up to 40,000sqm of additional retail space, improved leisure space and 3,100 additional homes.

The Lewisham Town Centre AAP will be one of four further proposed DPD’s that will set out new local planning policies, supplemented by guidance in the form of Supplementary Planning Documents (SPD’s).

The AAP is at the heart of regenerating the town centre. It provides a vision and a number of objectives for the area, supported by a suite of policies, guidance and a delivery plan. The AAP will demonstrate what is required to redevelop the area into a vibrant and successful centre, including improvements to shopping, living, working, and spending leisure time in the town centre. Further, the AAP will ensure individual developments support the town centre wide objectives, are well designed and environmentally smart.

The AAP has three sections to guide development:

- the spatial strategy which introduces the Masterplan for the town centre;
- a number of ‘Town Centre Areas’ and key sites within each area which provide local policies and guidance; and
- a suite of policies that are relevant across the entire town centre.

Lewisham Town Centre is situated in the London Borough of Lewisham and is especially well connected to central London by rail and the DLR and benefits from high PTAL of 6b and 6a. It is also sited on key radial and orbital roads providing it with easy access to both central London and the Kent countryside and coast. It is designated by the Mayor of London as a Major Town Centre and is the largest centre in the borough. See Figure 3-1 and Figure 3-2

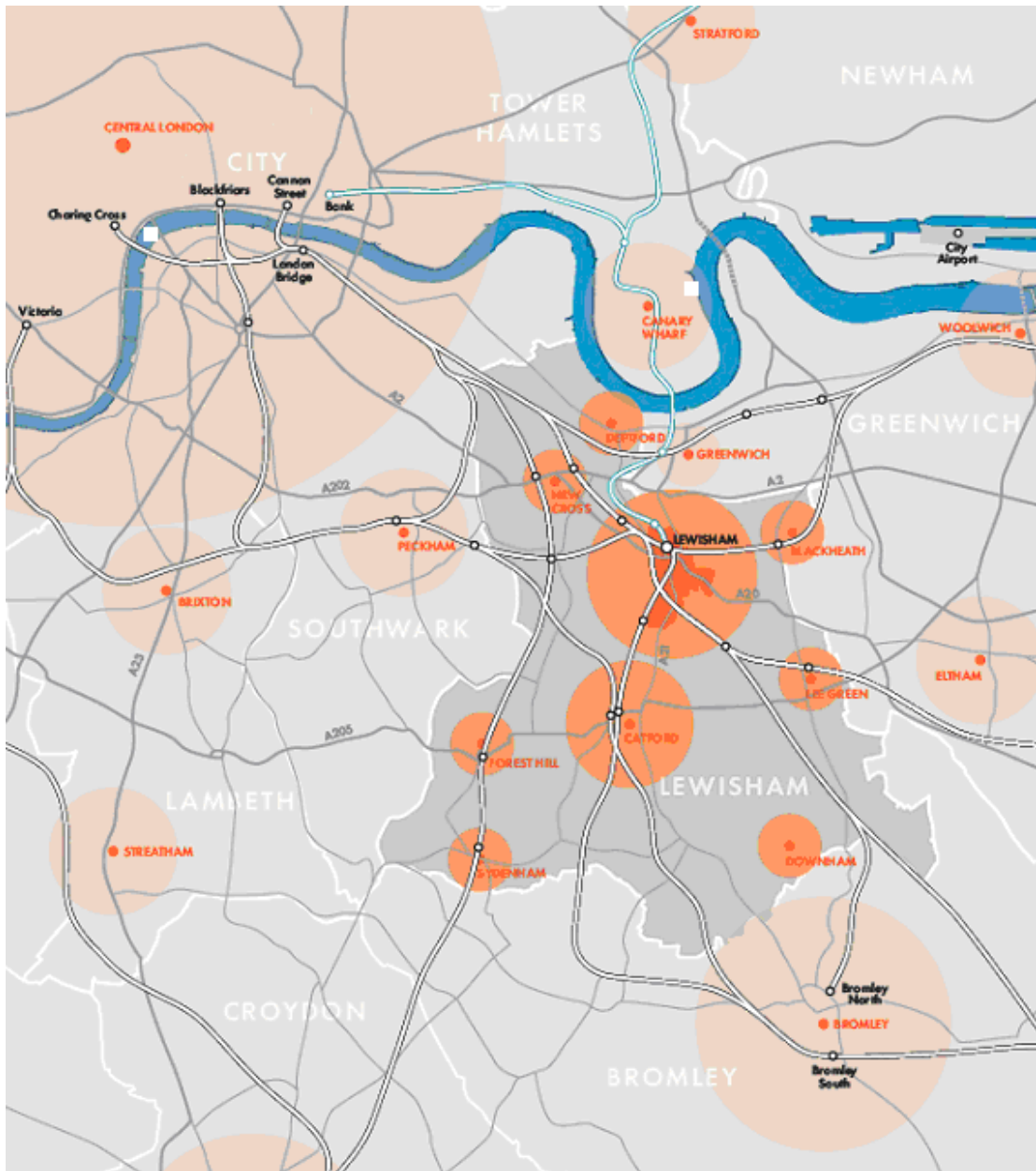


Figure 3-1 Lewisham in Context<sup>xii</sup>



Figure 3-2 Lewisham Town Centre Area Action Plan <sup>xii</sup>

### 3.2.1 Vision

Lewisham Strategic Partnership, of which Lewisham Council is a part, has adopted the following vision for the Borough, as set out in the Sustainable Community Strategy (SCS) 2008-2020<sup>xiii</sup> :

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

The Core Strategy provides more detail of the boroughs spatial strategy and heavily influences the plan for Lewisham town centre. The AAP then takes forward the wider spatial influence and sets out the following detailed vision for the town centre:

**“Lewisham Town Centre will have been transformed into a shopping and leisure destination of exceptional quality, offering a strong focus for community identity and cohesion. The centre will benefit from the Lewisham Gateway site delivering easier and better pedestrian routes between the bus and train stations and the high street, a new road layout and new commercial, retail and residential development. New high quality residential developments will help to increase the number and diversity of people using the centre and support its Metropolitan Town Centre status. The street market will continue to provide an extensive range of goods and its overall contribution to the quality of the urban environment will be improved. The Quaggy and Ravensbourne Rivers will be celebrated by the provision of a network of public green spaces and parks including Cornmill Gardens. A new landscaped public plaza where these two rivers meet will consolidate the identity of Lewisham as a river valley town and provide an enhanced sense of place and focus. Buildings, streets and spaces will be designed and managed to take account of climate change and incorporate on-site clean and renewable energy technologies, including a decentralised energy network.”**

### 3.2.2 AAP objectives

- **Objective 1** - Retail and town centre status: To support and improve the vitality and viability of Lewisham town centre and achieve Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space, improved leisure floorspace and evening economy space and enhancing distinctive features such as the street market.
- **Objective 2** - Housing: To deliver up to 2,300 additional new homes by 2016 and a further 800 additional new homes by 2021 to create a sustainable and mixed community of private and affordable housing in line with the Core Strategy with highest densities focused in locations with the highest level of public transport accessibility.

- **Objective 3** - Design quality: To apply consistently high standards of design including sustainable design and construction to individual sites to ensure that developments are accessible and safe, make the best use of natural resources, protect heritage assets, enable people to easily make environmentally aware choices and are carefully phased and co-ordinated to create a cohesive place and a sustainable community.
- **Objective 4** - Employment and training: To maximise job opportunities by ensuring the retention and re-provision of employment generating uses, the enhancement of training opportunities and the redevelopment of key sites throughout the town centre for a range of non-residential uses, including offices.
- **Objective 5** - Open space/recreation: To encourage healthy lifestyles through the maintenance, protection and improvement of the supply of publicly accessible open space (including public realm and the town centre streetscape), and incorporation of additional recreational and open space as part of new developments.
- **Objective 6** - Transport: To encourage patterns of development which support walking, cycling and the use of public transport, reduces the need for private car travel, maintains and where possible improves the high levels of public transport accessibility of the town centre and knits the centre in with the surrounding area.
- **Objective 7** - Environment: To protect and enhance the Rivers Quaggy and Ravensbourne and ensure that the town centre can mitigate and adapt to the risks arising from air pollution and climate change by focusing on protecting the area against extreme weather conditions, mitigating heat island effects and delivering energy efficient and low carbon development.
- **Objective 8** - Community: To create a safe and accessible place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of education, community and leisure facilities that keep pace with proposed growth.
- **Objective 9** - Implementing and monitoring the AAP: To ensure that partners in the public, private and third sectors continue to work together to ensure that the forecast growth in the town centre is carefully monitored, managed and delivered throughout the plan period.

It is important that the aims and objectives of the AAP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives (Table 4-4) to assist, where necessary, in refining the AAP aims and objectives as well as in identifying options.

## 4 SEA Objectives and Baseline and Context

### 4.1 Links to Other International, National, Regional, Local Plans and Programmes

This section summarises plans and programmes and related sustainability objectives established at other levels of the planning system that are relevant to the sustainability appraisal of the Lewisham Town Centre Area Action Plan.

Sustainability Appraisals of Local Development Documents should take account of sustainability policies and objectives set at other levels of the planning system, e.g. in relation to Regional Spatial Strategies and national Planning Policy Statements (or Regional Planning Guidance and Planning Policy Guidance, which they replace respectively). National and international policy and objectives should also be considered where they are relevant.

Table 4-1 provides a list of those reviewed in the context of the AAP. Appendix 3 Policies, Plans and Programmes of the SA Further Options Report<sup>i</sup> provide further details on these explaining their relevance to the AAP and the SA and how they have been considered during the SA process.

The relevant strategic and local plans and programmes and documents reviewed were:

Table 4-1 Plans Policies and Programmes

Plans, Policies and Programmes
<b>International</b>
Agenda 21 Declaration, United Nations Conference on Environment and Development (UNCED), Rio de Janeiro (1992)
Convention on Biological Diversity, Rio de Janeiro (1992)
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) (2002)
<b>European Union</b>
European Spatial Development Perspective (ESDP) (1999)
EU Sustainable Development Strategy (EU SDS) (2001)
European Community Biodiversity Strategy (1998)
Sixth Environment Action Programme of the European Community (2002 – 2012)
Directive 2008/50/EC on ambient air quality and cleaner air for Europe (2008)
Directive 2009/29/EC amending Directive 2003/87/EC so as to improve and extend the greenhouse gas emission allowance trading scheme of the Community (2009)
Council Directive 99/31/EC on the landfill of waste (1999)
Waste Framework Directive (Directive 2008/98/EC) on waste and repealing certain directives (2008).

<b>Plans, Policies and Programmes</b>
Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) (1992)
Birds Directive (Council Directive 2009/147/EC on the conservation of wild birds) (2009)
Directive 2000/60/EC on establishing a framework for Community action in the field of water policy (The Water Framework Directive) (2000)
<b>National</b>
Environmental Assessment of Plans & Programmes Regulations (2004)
Planning and Compulsory Purchase Act (2004)
Town And Country Planning Act (1990)
Planning and Energy Act (2008)
Energy Act (2008)
The Town and Country Planning (Use Classes) (Amendment) (England) Order (2005)
The UK Climate Change Act (2008)
Planning Policy Statement (PPS) 1: Delivering sustainable development
PPS: Planning and Climate Change – A Supplement to PPS1
PPS: eco-towns - A supplement to PPS 1
PPS2: Green belts
PPS3: Housing
PPS4: Planning for Sustainable Economic Growth
PPS5: Planning for the Historic Environment
PPS9: Biodiversity and Geological Conservation
Draft PPS: Planning for a Natural and Healthy Environment
PPS10: Planning for Sustainable Waste Management
PPS12: Local Spatial Planning
PPG13: Transport
PPG14: Development on Unstable Land
PPG17: Planning for Open Space, Sport and Recreation
PPG19: Outdoor Advertisement Control
PPS22: Renewable Energy
PPS23: Planning and Pollution Control
PPG24: Planning and Noise
PPS25: Development and Flood Risk
By Design: Urban Design in the planning system (2000)
Planning and access for disabled people: A good practice guide (2003)
Sustainable Development Action Plan for Education and Skills (2003)



Plans, Policies and Programmes
Learning for the Future: The DfES Sustainable Development Action Plan 2005/06 (2006)
Delivering choosing health: making healthier choices easier (2005) (Department of Health)
Employment Land Reviews: Guidance Note (December 2004) (Communities and Local Government)
Homes for the future: more affordable, more sustainable (2007) (Communities and Local Government)
Transport 2010: Meeting the local transport challenge (Department for Transport, 2001)
Transport 2010: the 10 year plan (DETR, 2000).
UK Air Quality Strategy 'Working Together for Clean Air' (2000)
Energy White Paper 2003 Our energy future: creating a low-carbon economy (2003)
National Waste Strategy for England (House of Commons Environment, Food and Rural Affairs Committee, 2007)
Safer Places: The Planning System and Crime Prevention (ODPM, 2004)
Healthy Weight, Healthy Lives: A Cross-Government Strategy for England (Cross government strategy led by the Department of Health and DCSF) 2008
The Flood and Water Management Act April 2010
London
The Mayor's Air Quality Strategy 'Clearing London's Air' (Greater London Authority, 2010)
The Mayor's Economic Development Strategy for London (Greater London Authority, May 2010)
Connecting with London's nature: The Mayor's Biodiversity Strategy (Greater London Authority, July 2002)
London Biodiversity Partnership Action Plan (1996)
Cultural Metropolis: The Mayor's Cultural Strategy – 2012 and Beyond (2010)
The London climate change adaptation strategy: Summary draft report (Greater London Authority, August 2008)
The draft climate change adaptation strategy for London: Public Consultation Draft (Greater London Authority, February 2010)
Delivering London's energy future: The Mayor's draft Climate Change Mitigation and Energy Strategy for consultation with the London Assembly and functional bodies (February 2010)
Streets For All: A Guide to the management of London's Streets (English Heritage, 2000)
Guide to Preparing Open Space Strategies - Best practice guidance of the London Plan (Greater London Authority, March 2004)
Empty Homes in London 2005-6 (Greater London Authority, March 2006)
The London Housing Strategy (GLA, February 2010)
The Mayor's Transport Strategy (GLA, May 2010)

<b>Plans, Policies and Programmes</b>
The London Plan (GLA, July 2011)
The Mayors Draft Municipal Waste Management Strategy: London's Wasted Resource (GLA, January 2010)
Health and Urban Planning Toolkit – NHS London Healthy Urban Development Unit (RTPI, June 2010)
Revised Supplementary Planning Guidance: London View Management Framework – The London Plan (Spatial Development Strategy for Greater London) (GLA, July 2010)
The London's Road Safety Plan (November, 2001)
Souder City: The Mayor's Ambient Noise Strategy (GLA, March 2004)
Mayor of London 'Green Light to Clean Power' Energy Strategy (GLA, 2004)
Connecting Londoners with Trees and Woodlands: A Tree and Woodland Framework for London (GLA, March 2005)
London Town Centre Health Check Analysis (GLA, December 2009)
<b>Lewisham</b>
Lewisham Core Strategy 2011-2026 (adopted June 2011)
Shaping Our Future: Lewisham's Sustainable Community Strategy (SCS) 2008-2020 (Lewisham Strategic Partnership, June 2008)
Community Safety Strategy (2008-2011) (CSS)
Safer Lewisham Strategy 2008-2011 Action Plan
Safer Lewisham Plan 2011-2012 (Draft for approval)
Lewisham Corporate Strategy 2008-2011
Lewisham Volunteering Strategy 2006-2011
Ageing well in Lewisham – A draft well-being strategy for older people 2007-10
Lewisham Cultural Strategy 2009-2013 (November, 2009)
People, Prosperity, Place: Lewisham Regeneration Strategy 2008 – 2020 (2008)
Lewisham – Opportunity and Wellbeing for All (Draft) Local Area Agreement (LAA) (2006-2009)
Healthier Communities Select Committee: Healthier Communities Framework for Lewisham (2007)
Lewisham Physical Activity Plan 2010-2013: more people, more active, more often in everyday life & leisure
Lewisham Social Inclusion Strategy 2005-2013
Policy Submission: A Natural Renaissance For Lewisham 2006-2011 (Lewisham Biodiversity Partnership, February 2007)
Lewisham Leisure and Open Space Study: A Final Report, Appendices and Maps (2010)
'Homes for the future: raising aspirations, creating choice and meeting need' Lewisham's Housing Strategy 2009 -2014
Brighter futures: Lewisham's Homelessness Prevention Strategy 2009-2014
It's Everybody's Business: Lewisham Children and Young People's Plan (CYPP)

Plans, Policies and Programmes
2009-2012
Draft Lewisham Municipal Waste Strategy
Lewisham Carbon Reduction and Climate Change Strategy (July 2008)
Lewisham Local Air Quality Action Plan (January 2008)
London Borough of Lewisham: Strategic Flood Risk Assessment (SFRA) (Jacobs, July 2008)
London Borough of Lewisham: Flood Risk and Development - Sequential Test (Jacobs, July 2009)
Lewisham Borough Wide Transport Study: Draft Final Report (February 2010)
London Borough of Lewisham: Employment Land Study Final Report (Roger Tym & Partners, November 2008)
Health, Well-Being and Care: Lewisham Joint Strategic Needs Assessment (JSNA)(April 2009)
Lewisham Retail Capacity Study (LRCS) (Nathaniel Lichfield and Partners, 2009)
Local Development Framework: Lewisham Infrastructure Delivery Plan (draft IDP) (August 2010)
Lewisham Strategic Housing Market Assessment (2007-2008)
South East London: Strategic Housing Market Assessment 2009 – Key Findings Report (draft 2010)
Lewisham Affordable Housing Viability Study (AHVS) (June, 2009)
Ravensbourne River Corridor Improvement Plan (Final draft September 2010)
Lewisham Town Centre Transport Study Final Report (October, 2010)
London Borough of Lewisham Local Implementation Plan (Draft) (2005)
Deptford New Cross Masterplan (2006)
Lewisham local development framework Draft Tall Buildings Study: An evidence based assessment (September, 2010)
Lewisham Borough Wide Character Study Final Report (Urban Practitioners, October 2010)
Lewisham Conservation Area Appraisals and Management Plans
Local Education Authority School Organisation Plan 2004-2009 (November 2003)
'Lambeth, Southwark and Lewisham NHS LIFT Strategic Service Development Plan' 2008

## 4.2 Principal legislative and policy changes

The following aspects of the planning policy framework have altered since the publication of the Preferred Options document in 2007.

### 4.2.1 Legislation

The Planning Act 2008 introduced a number of alterations to the planning system including a new Community Infrastructure Levy. The CIL Regulations 2010 set out a new tariff for raising funds from developers to help deliver infrastructure (but not affordable housing) that the Council could use which would scale back the use of planning obligations.

### 4.2.2 National planning policy guidance and designations

- Planning Policy Statement 4 (PPS4) - Sets out the Government's comprehensive policy framework for planning for sustainable economic development. This replaced PPG4, PPG5 and PPS6.
- Planning Policy Statement 5 (PPS5) – PPS5 and associated guidance sets out new advice on how the historic environment and heritage assets should be protected and enhanced for the current and future generations. This replaced PPG15 and PPG16.
- Planning Policy Statement 12 (PPS12) – PPS12 was updated in 2008 and sets out the Government's policy on the preparation of LDFs.
- Planning Policy Statement 25 (PPS25) – PPS25 sets out Government policy on development and flood risk and identifies the need for a proactive approach to the management and mitigation against the risk of flooding and adoption of a robust approach to avoiding inappropriate development in high risk areas. The advice was revised in 2010.
- Lewisham Bridge Primary School has been added to the statutory list of buildings (Grade II) that are of architectural and/or historic interest.

### 4.2.3 Spatial Development Strategy

- The London Plan (consolidated with alterations since 2004) was re-published in February 2008. The London Plan identifies Lewisham Town Centre as part of the Lewisham-Catford-New Cross Opportunity Area which is earmarked as having potential for intensification, regeneration and redevelopment in the context of good public transport accessibility. Mayor of London has reviewed the London Plan and a replacement Plan is due to be published in late 2011. The draft consultation version of the replacement plan retained the Opportunity Area.

- The Flood and Water Management Act received Royal Assent on 8th April 2010. The Act aims to improve both flood risk management and the way we manage our water resources. The Act creates clearer roles and responsibilities and instils a more risk-based approach. This includes a new lead role for local authorities in managing local flood risk (from surface water, ground water and ordinary watercourses) and a strategic overview role for all flood risk for the Environment Agency (EA). This falls short of being the comprehensive Act envisaged in the Pitt report, but Defra plan to introduce some additional measures on water management in the future. It is expected that the Act will be commenced in April 2011. However, risk management authorities will be expected to begin putting in place the organisational framework and strategic development ahead of this.

#### 4.2.4 *Lewisham Local Development Framework*

- Following significant strengthening of the local evidence base, the London Borough of Lewisham submitted its Core Strategy to the Secretary of State for formal examination in October 2010. The Council also published its Site Allocations Further Options Report in October 2010 for public consultation, which ran to 6 December 2011. This recommends that the former Watergate School site in Church Grove be allocated for a Gypsies and Travellers site to encompass five pitches and that Lewisham Bridge Primary school be allocated for redevelopment to cater for both primary and secondary education levels (an all-through school).
- The Core Strategy was adopted in June 2011.

#### 4.2.5 *Wider policy context*

- The Local Strategic Partnership published an updated Sustainable Community Strategy (Shaping Our Future) in 2008. In 2009, an updated set of improvement indicators and targets was published for Lewisham's Local Area Agreement, 'Opportunity and well-being for all'. It should be noted that the Coalition Government has recently abolished Local Area Agreements and associated indicators, effective from the end of the 2010-2011 monitoring period. In response the Council is currently reviewing the situation to ensure it maintains a suite of appropriate and local indicators within a monitoring framework for future years.
- The government's aspiration to create zero carbon new buildings started with the 'Building a Greener Future' document in 2007. This document contained a proposed timeline of incremental policy amendments, to be implemented via Part L of the Building Regulations, culminating in the requirement for all new homes submitted to Building Regulations approval after 2016 to be 'zero carbon'. The sustainability policy context continues to evolve and there is an increasing realisation that decentralised energy is a suitable policy option for urban areas.

- In line with guidance associated with the preparation of plans, the Council is placing greater emphasis on delivery and implementation to ensure that LDF documents are sound, and capable of realising the spatial policy objectives.

#### **4.3 Current and Predicted Future Social, Environmental and Economic Baseline Characteristics**

Baseline information is set out to establish the current state of the area covered by the AAP, and to identify trends in economic, environmental and social parameters. This information is then used to assess current sustainability issues that are evident in the area.

The baseline information is intended to provide a basis for predicting and monitoring the effects of implementation of the plan. It also helps to identify sustainability issues and alternative ways of dealing with them. This information was reported in the SA Scoping Report July 2005 and was reviewed and updated for the SA Report 2010.

Identifying the sustainability issues and problems is an opportunity to define the key social, environmental and economic issues which needed to be taken into account when preparing the AAP. In some cases these are constraints which must be overcome, or impacts which must be avoided; in other cases these may be opportunities (e.g. stimulating the local economy and employment markets).

Since the preparation of the original scoping report for the AAP, a series of consultation events have taken place leading up to, and as part of the Issues and Options stage (2005), the Preferred Options stage (2007) and the Further Options stage (2011). Consultation has included a range of techniques including workshops, exhibitions, written consultation, newsletters, online publications, stakeholder meetings and questionnaires. Full detail of the consultation process is outlined in the statement of consultation <sup>iv</sup>.

The social, economic and environmental issues that were identified from the review of each of these consultations and through collection of the baseline data identified in the Scoping Report 2010 are detailed in the SA Report 2011 Appendix 4 and summarised in

Table 4-2 below:

Table 4-2 Key Sustainability Issues

Key Sustainability issues
<p><b>Economic</b></p>
<p><b>Poor rates of retail growth in Lewisham Town Centre</b></p> <ul style="list-style-type: none"> <li>• With predicted population growth there is a need to enhance the vitality of Lewisham town centre, to improve the local economy and reduce the need to travel outside the borough for goods and services.</li> </ul> <p><b>Low quality retail offer</b></p> <ul style="list-style-type: none"> <li>• Issues with the street market, including mess and refuse, upgrading and improper parking.</li> <li>• Provision of adequate employment land to support business enterprise.</li> <li>• Sufficient employment land will need to be protected and new sites identified for mixed use development to improve the overall economy of the town centre and the borough.</li> <li>• Opportunities need to be taken to support employment growth sectors and improve local training opportunities.</li> <li>• Limited offer and a lack of growth of the evening economy. The vitality of the town centre should be enhanced beyond peak shopping hours.</li> </ul>
<p><b>Environmental</b></p>
<p><b>Protect and improve biodiversity and natural habitats including local waterways</b></p> <ul style="list-style-type: none"> <li>• Brownfield sites are important habitat for local species. Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered marked declines.</li> <li>• The naturalisation of Lewisham’s rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.</li> <li>• Climate change is predicted to increase adverse weather patterns, leading to more intense and severe flooding in flood risk areas. There is a need to reduce flooding and manage risk.</li> <li>• The Rivers Quaggy and Ravensbourne run through the AAP area and increase the risk of flooding in the area.</li> <li>• Future increased development could lead to increased potential risk of surface water flooding and sewer surcharging.</li> </ul> <p><b>Water quality and use</b></p> <ul style="list-style-type: none"> <li>• In order to proceed with housing growth then water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance.</li> <li>• Water quality of river and groundwater is needed as the town centre is situated within an Inner Source Protection Zone (SPZ1)</li> <li>• The Environment Agency have found evidence of plumbing misconnections at properties on Lee High Road which have resulted in foul water being discharged directly into the River Quaggy.</li> <li>• Lewisham Town Centre lies within Source Protection Zone 1 for a public water supply and is underlain by sensitive aquifers and so there may be constraints on drainage involving infiltration methods.</li> </ul>



Key Sustainability issues
<p><b>CO<sub>2</sub> emissions contributing to climate change</b></p> <ul style="list-style-type: none"> <li>• Climatic change due to greenhouse gas emissions from fossil fuel use is likely to affect the natural environment.</li> <li>• The built environment will need to adapt to these changes and find ways of reducing carbon emissions, including developing viable decentralised renewable energy networks to supply energy to new and existing developments.</li> <li>• Sustainable design and construction will be needed to reduce the heat island effect and provide landscaping, public realm and buildings that are better suited to the changing climate.</li> <li>• Lewisham's Energy policy requires a reduction in overall Carbon Dioxide (CO<sub>2</sub>) emissions from buildings by maximising efficiency gains through each stage of the Mayor of London's energy hierarchy.</li> </ul>
<p><b>Traffic congestion and car dependence</b></p> <ul style="list-style-type: none"> <li>• A growing population will increase movement, placing pressure on the road network and existing public transport. There is a need to locate development near existing transport links and improve walking and cycling routes and public transport; and adopt a managed and restrained approach to car parking.</li> </ul> <p><b>High levels of air pollution due to traffic</b></p> <ul style="list-style-type: none"> <li>• Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.</li> </ul>
<p><b>Aging building stock and poor levels of insulation</b></p> <ul style="list-style-type: none"> <li>• The existing building stock will require updating with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings.</li> </ul> <p><b>New building design</b></p> <ul style="list-style-type: none"> <li>• Inclusive design principles should inform the design of new buildings, public realm areas and facilities to ensure that the town centre is accessible to everyone.</li> </ul> <p><b>The need to increase the amount of renewable energy generated in the borough</b></p> <ul style="list-style-type: none"> <li>• Lewisham's Energy policy requires an increase in the proportion of energy generated from renewable energy sources.</li> </ul> <p><b>Low levels of recycling and the need to reduce total waste production</b></p> <ul style="list-style-type: none"> <li>• There is a need to reduce waste generation and improve recycling and composting rates. With requirements to manage waste within the borough boundaries this issue will become increasingly important.</li> </ul>
Social
<p><b>High demand for housing, affordability and continuous growth in population</b></p> <ul style="list-style-type: none"> <li>• The population is forecasted to rise. The Core Strategy target of 1,500 new additional homes by 2016 and a further 1,100 by 2026 in Lewisham town centre. The average income of the majority of households is insufficient to buy a house.</li> <li>• There is an issue with access to affordable housing in Lewisham, highlighted by Lewisham Housing Commission.</li> </ul> <p><b>Decent and accessible homes</b></p> <ul style="list-style-type: none"> <li>• The percentage of homes that do not meet decent homes standards is reducing;</li> </ul>

<b>Key Sustainability issues</b>
<p>however there is still a need to improve this.</p> <ul style="list-style-type: none"> <li>• New residential development should meet Lifetime Homes Standards and, where car parking can be provided, includes at least 10% of homes that are wheelchair accessible or easily adaptable to be so.</li> </ul>
<p><b>Improved access to health care, education and community facilities</b></p> <ul style="list-style-type: none"> <li>• Ensure that improved and accessible health, education and community facilities are provided to accommodate the needs arising from new developments and meeting existing needs.</li> </ul> <p><b>Low levels of educational attainment</b></p> <ul style="list-style-type: none"> <li>• There is a need to improve the educational attainment of students in primary and secondary schools as previous years. Lewisham is ranked in the worst third of Local Authorities for National Indicator 75.</li> </ul> <p><b>Addressing deprivation, social exclusion and health inequalities</b></p> <ul style="list-style-type: none"> <li>• The area covering Lewisham town centre is among the 20% most deprived areas within England. In Lewisham Central residents have also reported higher levels of limiting long term illness and lower than average food health levels.</li> <li>• There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.</li> </ul>
<p><b>General perception of high crime rates in Lewisham</b></p> <ul style="list-style-type: none"> <li>• Though Lewisham has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment with adequate natural surveillance.</li> <li>• Lewisham town centre is vulnerable to crime due to the high volume of people using it, therefore creating a safe environment and improving the perception of crime in the area is essential in achieving the objective to improve the retail performance of the centre.</li> </ul>
<p><b>Provision of open space and recreational facilities</b></p> <ul style="list-style-type: none"> <li>• Future growth in the housing sector will result in a lower proportion of open space per 1000 population. Opportunities to provide additional open spaces from potential developments must be used to improve health and well-being. Previous community consultation suggests that access to open and green space is a key issue for local residents.</li> </ul>
<p><b>Noise</b></p> <ul style="list-style-type: none"> <li>• Road traffic and road works noise are the most problematic types of noise for Lewisham residents.</li> </ul> <p><b>Road safety</b></p> <ul style="list-style-type: none"> <li>• The results of stakeholder consultations have identified problems with pedestrian safety, particularly in the High Street, where there are problems with conflict between traffic, buses and pedestrians.</li> <li>• The number of road accidents although reducing could still be improved.</li> </ul>

### Key Sustainability issues

#### **Protect and enhance local heritage assets (cultural, archaeological and historic) and their settings and maximise the contribution that the historic environment can make to an area**

- Lewisham has two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and four conservation areas in or around the town centre.
- The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals.

#### 4.3.1 *Economic climate*

There have been significant changes in the UK property market in recent years, largely in response to the impact of the “credit crunch” and recent period of recession. Public spending, as set out in the Government’s Public Sector Spending Review (October 2010), is also going to be severely constrained within the next 5-10 years. It is important that the AAP policies are reviewed to ensure that they remain robust and credible in the context of the current and projected property market and public sector spending regime.

#### 4.3.2 *Evidence base*

The council have undertaken a number of new and updated evidence base studies since 2007 in support of the wider local development framework process. The following summary of strengths, weaknesses and opportunities draws on a number of these evidence base documents to provide a summary of the key results. The studies include Lewisham Employment Land Study January 2009, Lewisham Housing Market Assessment February 2010, Lewisham Retail Capacity Study 2004, Lewisham Retail Capacity Study 2009, Lewisham Strategic Housing Market Assessment, South East London Strategic Housing Market Assessment 2009, London Strategic Housing Land Availability Assessment, Housing Capacity Study October 2009 and Lewisham Town Centre Transport Study 2010.

### Strengths

- Lewisham is the largest and most important retail centre in the Borough and provides the main opportunity to improve comparison goods shopping.
- The Lewisham Shopping Centre has a very strong occupational market with good demand by retailers for space. This is the key focus of retail activity in the town.
- Overall Lewisham has a relatively low retail vacancy rate which implies that the local retail market is strong.
- There is much residential development being planned or about to be constructed in Lewisham. Much of this residential space is due to come onto the market in 2011/2012.

- Although residential property prices have fallen since the credit crisis, they have since re-bounded. Lewisham is a popular location for young professionals to live hence the large number of 1 and 2 bedroom apartments. Lewisham also has a strong private-rent market which has remained so over the last 2 years despite weaknesses in other markets.
- Lewisham has excellent transport links, with a mainline railway station, DLR station and multiple bus routes. As a result large areas of the town centre have PTAL levels of 6b and 6a.

### Weaknesses

- Lewisham has a high proportion of residents who are classified as unemployed, requiring benefit or are vulnerable being either homeless or older persons with health problems.
- There are a high number of residents employed locally in Public Sector institutions. Although this area of employment was once secure, this position has changed and it is likely that employment cuts will be made throughout the Public Sector during 2010-2011 and for several subsequent years.
- The layout of Lewisham's busy roads which circulate the shopping centre, inhibit access to it by both foot and car.
- Retail development in the UK has slowed since 2007 with a number of planned schemes being shelved. This uncertainty will not help Lewisham's aspirations for development of retail floorspace.
- Although the Lewisham Shopping Centre is reportedly trading well, retailers located on secondary and tertiary streets may find trading hard in the present financial climate. There is a risk that some retail units on the outskirts of Lewisham Town Centre with low levels of foot flow, may become vacant.
- Some of the retail units located inside the Lewisham shopping centre are too small to satisfy modern retailers requirements.
- There are only a small number of leisure facilities in Lewisham therefore residents tend to travel out of Lewisham for facilities such as the cinema. There are plans for leisure development but these have yet to come to fruition.
- Lewisham has no critical mass of existing office space and a number of factors mean that it is unlikely that further large occupiers will be attracted to the town in the short to medium term.

- There is an over supply of 1 and 2 bedroom apartments in Lewisham which has created an imbalance between this type of housing and family housing. Demand for family housing is relatively strong but supply is poor.
- The buy to let market has faltered somewhat since 2008 due to the difficulties for investors to raise finance.

### Opportunities

- The population of Lewisham grew by 3% between 2001 and 2008. It is forecast to increase by almost a quarter (64,300) between 2006 and 2031 which will benefit the property market's ability to grow and the development of retail, office and residential space.
- There are a high proportion of individuals in Lewisham categorised as educated young professionals who work in Central London and who have relatively high levels of disposable income.
- There is demand from a number of major retailers located in Lewisham Town Centre for larger amounts of retail space. Due to the lack of supply and the high demand for space in the shopping centre, rents have remained constant from 2008 levels. There is also significant forecast retail capacity.
- The Lewisham Gateway development scheme is a major opportunity for Lewisham which will assist in bringing the town closer to its Metropolitan status and which, as well as providing new retail, and residential space will also address some of the issues associated with the existing road layout.
- There is a requirement over the next five years for 12,685 social rented homes in Lewisham Borough. The delivery of affordable housing in Lewisham is a key target for the Council and it is important that this is carefully managed so that development remains viable.

#### 4.4 Sustainability Appraisal Objectives, Targets and Indicators

The SA objectives provide a method for describing, analysing and comparing the sustainability effects of plans and policies. A series of sustainability objectives were developed at the scoping stage, taking into account the relationship between the AAP and the objectives of other plans and programmes, along with the findings of the baseline information review.

The SA objectives were developed and consulted on as part of the SA Scoping process. The objectives have been reviewed in light of comments received as part of the Scoping Report 2010 consultation and the revised objectives are listed below; changes made to the sustainability objectives as a result of consultation on the 2010 refreshed scoping report are highlighted in blue.

These objectives formed the basis for the SA Framework within which the evaluation of different AAP options and policies has been carried out; these are presented in Table 4-3 below.

The full list of SA objectives including, targets and indicator sources are available in Appendix C.

Table 4-3 Sustainability Appraisal Objectives

Ref	Topic	Sustainability Appraisal Objectives
<b>Social</b>		
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport
Soc2	Decent homes	To increase the provision of housing that meets decent homes standards
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities
Soc5	Historic environment	To protect and enhance heritage assets and their settings and utilise the historic environment in the creation of sustainable places
Soc6	Culture	To protect and enhance cultural diversity and promote community cohesion and civic pride
Soc7	Crime	To reduce crime levels in the town centre and reduce fear of crime
Soc8	Education	To increase access to lifelong learning
Soc9	Social inclusion and deprivation	To improve access to amenities for vulnerable members of the community and reduce poverty and deprivation
Soc10	Road safety	To improve pedestrian safety in the town centre
Soc11	Health	To improve inclusive access to local healthcare facilities and encourage healthy lifestyles through sustainable urban design
Soc12	Noise	To reduce noise from road traffic, construction and industry
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces
<b>Environmental</b>		
Env1	Effects of climate change	To ensure Lewisham town centre is resilient to climate change by using mitigation and adaptation measures through sustainable design and construction
Env2	Flood risk	To reduce and manage the risk and effects of flooding
Env3	Sustainable transport	To reduce dependency on private cars through enhancing pedestrian, cycle and public transport routes throughout the town centre

Ref	Topic	Sustainability Appraisal Objectives
Env4	Renewable energy	To increase on-site renewable energy provision
Env5	Energy efficiency	To increase the energy efficiency performance of existing buildings
Env6	Waste and recycling	To reduce the consumption of materials and resources and the production of waste and increase the amount of waste recycling
Env7	Water quality and use	To provide sustainable sources of water and promote water efficiency
Env8	Air quality	To improve air quality
Env9	Nature conservation	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies
Env10	Maintain and enhance landscapes and townscapes	To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape
<b>Sustainable economic growth</b>		
Eco1	Retail offer	To increase the diversity of the retail offer
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy
Eco3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment
Eco4	Local business	To increase density of local business
Eco5	Employment opportunities	To increase access to local employment and reduce local unemployment

#### 4.4.1 Sustainability Appraisal of the AAP objectives

It is important that the aims and objectives of the AAP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives (Table 4-4) to assist, where necessary, in refining the AAP aims and objectives as well as in identifying options. The objectives are listed in section 3.2.2 of this report (p17-18).

#### 4.4.2 Results of the Sustainability Appraisal of the AAP objectives

The appraisal carried out to test the AAP objectives against each SA objective was undertaken by Urban Practitioners and consulted on in the SA Further Options Report March 2011<sup>xii</sup>. The results of the comparison showed that there were some areas of possible conflict.

The following amendments were made to resolve these potential conflicts:

- Possible conflict with new affordable housing in terms of increasing car use for Objective 6. The current SA objectives were amended to include 'with good connectivity to public transport'.
- Possible conflict with new retail, residential and business development with increasing open space and protecting biodiversity. Consideration of biodiversity, open space and reducing impact on environment were added to the relevant AAP Objectives 1, 2 and 5.
- There is possible conflict between provision of additional housing and access to healthcare, employment and other local facilities for existing and new population. AAP Objectives 2 and 4 were amended to provide for this additional demand.
- Possible conflict with new development and heritage value of existing town centre. This consideration is now included in AAP Objective 5.



Sustainability Appraisal of the Lewisham Town Centre Area Action Plan Proposed Submission Version

Table 4-4 SA Appraisal of the AAP Objectives

	Objective 1 Retail and town centre status	Objective 2 Housing	Objective 3 Sustainable Design	Objective 4 Employment	Objective 5 Open space/recreation	Objective 6 Transport	Objective 7 Environment	Objective 8 Leisure and community	Objective 9 Implementing and monitoring the AAP
<b>Soc1</b>	Positive compatible	Positive compatible	Positive compatible	Possible conflict	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Positive compatible
<b>Soc2</b>	Positive compatible	Positive compatible	Neutral	Neutral	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Soc3</b>	Neutral	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Soc4</b>	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc5</b>	Possible conflict	Possible conflict	Positive compatible	Possible conflict	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Soc6</b>	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc7</b>	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc8</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc9</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc10</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc11</b>	Neutral	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc12</b>	Positive compatible	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc13</b>	Positive compatible	Possible conflict	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Env1</b>	Neutral	Possible conflict	Positive compatible	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env2</b>	Neutral	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env3</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Env4</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env5</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Env6</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env7</b>	Positive compatible	Positive compatible	Neutral	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env8</b>	Positive compatible	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible
<b>Env9</b>	Possible conflict	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env10</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible

Sustainability Appraisal of the Lewisham Town Centre Area Action Plan Proposed Submission Version

	Objective 1 Retail and town centre status	Objective 2 Housing	Objective 3 Sustainable Design	Objective 4 Employment	Objective 5 Open space/recreation	Objective 6 Transport	Objective 7 Environment	Objective 8 Leisure and community	Objective 9 Implementing and monitoring the AAP
<b>Eco1</b>	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Possible conflict	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Eco2</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Eco3</b>	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Eco4</b>	Positive compatible	Possible conflict	Neutral	Positive compatible	Possible conflict	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Eco5</b>	Positive compatible	Possible conflict	Neutral	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible

## 5 AAP Options and Alternatives

The following sections identify the issues and associated options that were considered during development of the AAP.

### 5.1 Main Strategic Alternatives Considered and How They Were Identified

#### 5.1.1 *Options and Alternatives*

In developing the AAP a series of options and alternatives were produced and a sustainability commentary on the proposed options was prepared to highlight potential conflict or issues and opportunities to strengthen the delivery of the sustainability objectives.

This SA Report should be read in conjunction with the Issues and Options Report 2005<sup>xi</sup> prepared by Urban Practitioners which discusses the issues and options in full details.

These results of the initial sustainability appraisal are also presented below in Table 5-1 to Table 5-16 of this Report.

Table 5-1 Housing LTC1 A, B, C –Options/Alternatives Initial Sustainability Commentary

HOUSING		
LTC1: THE BOROUGH HAS A TARGET OF 17,350 ADDITIONAL DWELLINGS (TO 2016). HOW CAN HOUSING NEED BEST BE MET IN THE TOWN CENTRE?		
LTC1A	Have policies seeking to increase the density of residential uses (see also Issue HSG3).	Increasing density through the redevelopment or conversion of existing sites (Option B) would help to reduce pressure on open space or on sites that may have ecological value.
LTC1B	Have policies encouraging the redevelopment or conversion of existing sites with residential as part of a mix (e.g. employment/retail ground floor with residential above).	Increasing the amount of dwellings could contribute towards Sustainability Objectives Soc1 (provision of high quality affordable homes) if there is a policy approach to delivering a proportion of affordable homes - as proposed below.
LTC1C	Promote new development in the town centre including residential uses as part of a mix of uses. This could be achieved by the allocation of specific additional sites in the town centre to include some residential development.	<p>If all housing developments (through either Option A, B or C) are close to public transport this would contribute towards meeting Sustainability Objective Env2 (to reduce dependency on private cars).</p> <p>Conversion of existing buildings (Option B) could contribute towards Sustainability Objective Soc2 (To increase the provision of housing that meets decent homes standards) where the new housing replaces poor quality existing housing.</p>

Table 5-2 Housing LTC2 A, B, C - Options/Alternatives Initial Sustainability Commentary

<b>LTC2: BOROUGH REQUIRES 7,250 TO 12,950 AFFORDABLE DWELLINGS FROM 2000 TO 2008 TO MEET FUTURE HOUSING NEED. SHOULD THERE BE A SPECIFIC TOWN CENTRE AFFORDABLE HOUSING POLICY?</b>		
LTC2A	No specific affordable housing policy required for Lewisham town centre, borough wide affordable housing policy should be adhered to.	Delivering a higher proportion of affordable housing (Option C) would meet Sustainability Objective Soc1 (increase the provision of high quality affordable homes with good connectivity to public transport) providing that the homes are of high quality and close to public transport nodes.
LTC2B	A policy which takes a more flexible approach to the provision of affordable housing in Lewisham town centre in terms of size, tenure, location and quantity of provision. This may result in delivery of fewer affordable homes than option LTC2A.	
LTC2C	A policy approach which seeks to deliver a higher proportion of affordable housing in Lewisham town centre. This may result in the delivery of more affordable homes than option LTC2A.	

Table 5-3 Housing LCT3 A, B, C - Options/Alternatives Initial Sustainability Commentary

<b>LCT3: HOW BEST CAN THE AAP PROMOTE HIGHER RESIDENTIAL DENSITIES IN AREAS OF HIGH PUBLIC TRANSPORT ACCESSIBILITY?</b>		
LTC3A	Retain existing Sustainable Living Area approach.	Promotion of car-free housing (Option B) for developments near public transport nodes would support Sustainability Objective Soc1 (increase the provision of high quality affordable homes with good connectivity to public transport).  Removal of right to street parking permits (Option C) could contribute to Sustainability Objective Env2, although there may be negative effects (e.g. illegal parking and congestion).
LTC3B	Promote car-free housing.	
LTC3C	Removal of right to a street parking permit for occupiers of new residential developments.	

Table 5-4 Housing LCT4 A, B, C- Options/Alternatives Initial Sustainability Commentary

LCT4: HOW SHOULD THE AAP MAKE PROVISION FOR THE TRAVELLER COMMUNITY?		
LTC4A	Identify and allocate a traveller site within Lewisham town centre.	This issue is not addressed by the sustainability objectives.
LTC4B	Identify and allocate a traveller site outside Lewisham Town Centre.	
LTC4C	Include a criteria-based policy in order to provide a framework to assess the suitability of new proposals.	

Table 5-5 Retail and Town Centres LTC5 A, B - Options/Alternatives Initial Sustainability Commentary

RETAIL AND TOWN CENTRE STATUS		
LTC5: HOW CAN LEWISHAM TOWN CENTRE BEST MOVE TOWARDS METROPOLITAN CENTRE STATUS?		
LTC5A	Rely on existing site allocations for new retail developments in the town and determine applications for additional retail developments on their merits.	Both Option A and B would address Sustainability Objective Eco1 (To increase the diversity of the retail offer), providing that this will increase the diversity of the retail offer.  Allocation of sites according to the retail capacity study would provide a more planned and predictable approach and may make it easier to consider the other impacts associated with the development. Other impacts would include: road safety (Soc10), sustainable transport (Env2), access to local employment (Eco4).
LTCB	Allocate new sites for retail development with regard to the retail capacity study in order to plan for and accommodate identified retail capacity to help the town centre move toward the floorspace required to meet metropolitan status (100,000m <sup>2</sup> ).	



Table 5-6 Retail and Town Centres LTC6 A, B, C, D, E, F, G H - Options/Alternatives Initial Sustainability Commentary

LTC6: HOW CAN LEWISHAM TOWN CENTRE'S VITALITY AND VIABILITY BEST BE SUPPORTED?		
LTC6A	Public realm enhancements.	<p>Supporting a greater mix of uses (Option C) would contribute towards Sustainability Objective Eco2 (To encourage a vibrant, well-managed evening economy) and Eco1 (To increase the diversity of the retail offer).</p> <p>Making Lewisham a safer place (Option D) would contribute towards Sustainability Objective Soc7 (To reduce crime levels in the town).</p> <p>Allocating new sites for retail development (Option F) could contribute towards Sustainability Objective Eco2 (To increase the diversity of the retail offer).</p> <p>Encouraging a greater mix of uses, including residential development would contribute towards Sustainability Objective Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport).</p>
LTC6B	Encourage new development on the Lewisham Gateway site to raise the profile of the town centre as a whole.	
LTC6C	Support a greater mix of uses including cafes, bars and other evening economy uses to support vitality of retail offer.	
LTC6D	Make Lewisham a safer place.	
LTC6E	Support shop front improvements and funding programmes.	
LTC6F	Allocate new sites for retail development.	
LTC6G	Encourage a greater mix of uses within the town centre including residential development.	
LTC6H	Re-development at key locations within the High Street to provide marker buildings with a mix of uses.	

Table 5-7 Retail and Town Centres LTC7 A, B, C, D - Options/Alternatives Initial Sustainability Commentary

LTC7: IF IMPLEMENTED, LEWISHAM GATEWAY HAS THE POTENTIAL TO BRING WIDE RANGING BENEFITS TO THE TOWN CENTRE. HOW SHOULD THE AAP ADDRESS THE ISSUES ASSOCIATED WITH LEWISHAM GATEWAY?		
LTC7A	Allocate the Lewisham Gateway site for high density mixed-use development.	<p>High density mixed use development (Option A) could include affordable homes, community facilities, retail and evening economy sites. This type of mixed use would support Sustainability Objectives:</p> <ul style="list-style-type: none"> <li>- Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport);</li> <li>- Soc4 (To increase the provision of accessible and inclusive everyday facilities);</li> <li>- Eco1 (To increase the diversity of the retail offer) providing that this will increase the diversity of the retail offer;</li> <li>- and Eco2 (To encourage a vibrant, well-managed evening economy).</li> </ul> <p>However, it is not clear what mixed use development is proposed for Option A.</p> <p>Using the southern part of the High Street as a prime focus for community activity (Option D) would support several Sustainability Objectives:</p> <ul style="list-style-type: none"> <li>- Soc4 (To increase the provision of accessible and inclusive everyday facilities);</li> <li>- Soc9 (To improve access to amenities for vulnerable members of the community);</li> <li>- and potentially Soc8 (To increase access to lifelong learning) through the library.</li> </ul>
LTC7B	Rely on existing development site allocation in the UDP to facilitate redevelopment of the roundabout site.	
LTC7C	Identify and allocate sites in the southern part of the centre for the redevelopment in order to seek to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development.	
LTC7D	Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime retail as a focus for community activity. This role might be a focus for community activity, with the library representing an obvious stimulus for this type of activity. An alternative focus could be a focus on evening economy uses.	

Table 5-8 Retail and Town Centres LTC8 A, B, C, D - Options/Alternatives Initial Sustainability Commentary

<b>LTC8: WHAT APPROACH SHOULD THE AAP TAKE TO THE DESIGNATION OF CORE AND NON-CORE SHOPPING FRONTAGES?</b>		
LTC8A	Maintain current distinction between core and non-core frontages as currently shown on the proposals map.	Integrating a more diverse mix of uses including the evening economy (Option C) could support Sustainability Objectives Eco1 (To increase the diversity of the retail offer) and Eco2 (To encourage a vibrant, well-managed evening economy).
LTC8B	Review existing allocation of core and non-core frontages.	
LTC8C	Introduce a geographical basis for designating retail zones with greater scope for integrating a more diverse mix of uses including evening economy.	
LTC8D	Remove shopping frontage designations and rely on town centre boundary.	

Table 5-9 Retail and Town Centres LTC9 A, B, C, D - Options/Alternatives Initial Sustainability Commentary

LTC9: HOW SHOULD THE TOWN CENTRE'S POTENTIAL FOR A MORE VIBRANT EVENING ECONOMY BE MANAGED?		
LTC9A	Do not provide a specific town centre policy approach.	Options B, C and D all contribute to sustainability objective Eco 2 (to encourage a vibrant, well-managed evening economy). The policy would have to consider how to ensure that the evening economy is well-managed.
LTC9	Maintain existing core and non-core frontage approach.	
LTC9C	Encourage evening economy uses as part of a mix of uses in specified locations.	
LTC9D	Concentrate evening economy uses in a particular zone.	

Table 5-10 Retail and Town Centres LTC10 A, B - Options/Alternatives Initial Sustainability Commentary

<b>LTC10: SHOULD THE TOWN CENTRE BOUNDARY BE ALTERED?</b>		
LTC10A	Maintain existing designation.	<p>Removing one or more of the options i-iv (Option B) would potentially limit the opportunities to provide affordable homes, community facilities, retail offer, employment opportunities, density of local business and access to local employment. This would have a negative contribution to Sustainability Objectives: Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport); Soc4 (To increase the provision of accessible and inclusive everyday facilities); Eco1 (To increase the diversity of the retail offer); or Eco2 (To encourage a vibrant, well-managed evening economy).</p> <p>Option i - North-west corner of the town centre and Option ii - Conington Road area both benefit from very good levels of public transport accessibility and, therefore, developments on this site would support Env2 (To reduce dependency on private cars).</p>
LTC10B	Review town centre boundary to achieve a tighter core by removing one or more of options (i)-(vi) on page 28.	

Table 5-11 Urban Design LTC11 A, B, C, D - Options/Alternatives Initial Sustainability Commentary

URBAN DESIGN		
LTC11: WHAT APPROACH SHOULD BE TAKEN TO THE LOCATION AND DESIGN OF TALL BUILDINGS?		
LTC11A	Retain existing approach whereby tall buildings are considered appropriate in Lewisham town centre if the site is covered by a development brief identifying it as such.	Setting out criteria against which all developments for tall buildings will be considered (Option D) would help to set standards for tall buildings to ensure they contribute towards sustainability. In particular, it could specify that tall buildings: <ul style="list-style-type: none"> <li>- are located close to transport hubs and so supporting Sustainability Objectives Env2 (To reduce dependency on private cars.)</li> <li>- consider carbon emissions from these buildings and so support Sustainability Objective Env3 (To increase on-site renewable energy provision).</li> <li>- consider management of waste and recycling and so support Sustainability Objective Env5 (To increase the amount of waste recycling).</li> </ul>
LTC11B	Seek generally to encourage tall buildings in the town centre, removing the requirement for development brief endorsement.	
LTC11C	Seek to concentrate tall buildings in a specific location(s).	
LTC11D	Set out criteria against which all developments for tall buildings will be considered, including the requirement to demonstrate the highest quality architecture.	

Table 5-12 Employment and Business Issues LTC12 A, B, C, D - Options/Alternatives Initial Sustainability Commentary

EMPLOYMENT AND BUSINESS ISSUES		
<b>LTC12: WHAT POLICY APPROACH SHOULD BE TAKEN TO EXISTING ESTABLISHED INDUSTRIAL AREAS IN THE TOWN CENTRE?</b>		
LTC12A	Seek to retain existing employment generating uses in the town centre.	Retaining existing employment generating uses (Option A) is not sufficient for Sustainability Objective Eco4 (To increase access to local employment).
LTC12B	Seek to release land from specific employment allocations in order to promote redevelopment and seek to make the best use of land through mixed use schemes.	Releasing land from specific employment allocations (Option B) could have a negative contribution towards Sustainability Objective Eco4 (To increase access to local employment), depending on the type of mixed use schemes proposed.
LTC12C	Seek to protect existing office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.	Promoting new office development (Option C) may contribute to Sustainability Objective Eco4, if this development allowed access to employment.
LTC12D	Seek to encourage the conversion of town centre office accommodation to residential uses.	Conversion of town centre office accommodation to residential uses (Option D) could contribute to Sustainability Objective Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport), but would contribute negatively to Sustainability Objectives Eco4.

Table 5-13 Open Space LTC13 A, B, C, D - Options/Alternatives Initial Sustainability Commentary

OPEN SPACE		
LTC13: HOW SHOULD THE AAP SEEK TO ADDRESS OPEN SPACE PROVISION WITHIN LEWISHAM TOWN CENTRE?		
LTC13A	Retain existing open space provision.	<p>Ensuring new development provides amenity space would contribute towards Sustainability Objective Soc13 (To increase the quality and provision of publicly accessible open spaces).</p> <p>The other options (A, B and D) would not contribute towards this objective as they either threaten or do not increase open space provision.</p> <p>Improve accessibility to existing provision could contribute towards Sustainability Objective Soc3 (To increase recreational access to the Quaggy and Ravensbourne rivers) if this is related to the river environment.</p>
LTC13B	Improve the quality of open space provision.	
LTC13C	Improve accessibility to existing provision.	
LTC13D	Ensure new development provides essential amenity space in high density developments.	



Table 5-14 Transport LTC14 6 A, B, C - Options/Alternatives Initial Sustainability Commentary

TRANSPORT		
LTC14: SHOULD PARKING STANDARDS FOR NEW DEVELOPMENTS BE REVIEWED?		
LTC14A	Retain existing standards for new development.	Reducing parking standards (Options B and C) would contribute towards Sustainability Objective Env2 (To reduce dependency on private cars) and potentially Soc 10 (To improve pedestrian safety in the town centre) and Soc12 (To reduce noise from road traffic, construction and industry).
LTC14B	Adopt London Plan Standards.	
LTC14C	Apply a more stringent approach than that standards set out in the London Plan.	

Table 5-15 Transport LTC15 A, B, C - Options/Alternatives Initial Sustainability Commentary

<b>LTC15: IN THE CONTEXT OF POTENTIAL SIGNIFICANT GROWTH IN RETAIL FLOORSACE IN LEWISHAM TOWN CENTRE, WHAT APPROACH SHOULD BE TAKEN TO THE PROVISION OF PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE?</b>		
LTC14A	Rationalise existing provision to encourage the use of public transport.	Maintaining existing parking standards (Option A) would contribute towards Sustainability Objective Env2 (To reduce dependency on private cars) and potentially Soc 10 (To improve pedestrian safety in the town centre) and Soc12 (To reduce noise from road traffic, construction and industry).
LTC14B	Seek to retain existing levels of public parking.	
LTC14C	Seek to increase provision of public parking.	

Table 5-16 LTC16 A, B - Options/Alternatives Initial Sustainability Commentary

<b>ENVIRONMENT</b>		
<b>LTC16: PROTECTION OF THE RIVER ENVIRONMENT</b>		
LTC16A	New development should contribute to enhancing and protecting the river environment.	Option A would contribute to Soc3 (To increase recreational access to the Quaggy and Ravensbourne Rivers) if they also increase access to the rivers. Option A would also contribute towards Sustainability Objective Env8 (To protect, value and enhance biodiversity) if the ecological value of the rivers is protected and enhanced.
LTC16B	On the basis that there is no demonstrable harm to the river and its environment contributions should not be sought.	

## 5.2 Preferred Options

The full Audit of Issues, Options, Preferred Options and Policies is contained within Appendix A of this Report.

Following consultation on the Issues and Options Report (2005) and the, initial Sustainability Appraisal a detailed range of draft policies which reflected the comprehensive coverage of the issues, options and preferred options identified by the AAP process was produced.

The AAP Preferred Options Report 2007 was accompanied by a Sustainability Appraisal of these draft policies produced by Faber Maunsell / AECOM 2007. This report has been included as Appendix B of this report.

The Preferred Options Report subsequently suggested policy options to correspond to the identified issues and Preferred Options covering the following themes:

- Housing
- Shopping and town centre
- Urban design
- Employment and business
- Open space
- Transport
- Environment
- Community and leisure
- Implementation

The following policies: Thematic Policies (Table 5-17) and Opportunity Area Policies (Table 5-18) were then established from the preferred options to provide a framework for the AAP development.

*Table 5-17 Draft PO Thematic Policies*

Thematic Policies		
Housing	HSG1	Meeting Housing Needs
	HSG2	Mixed Use Development
	HSG3	Conversion of Existing Buildings
	HSG4	Affordable Housing

Thematic Policies		
	<b>HSG5</b>	Dwelling Mix
	<b>HSG6</b>	Housing Density
	<b>HSG7</b>	A Restrictive Approach to Residential Parking
	<b>HSG8</b>	Traveller's Site
	<b>HSG9</b>	Residential Standards
<b>Shopping &amp; Town Centre</b>	<b>SH1</b>	Lewisham Town Centre
	<b>SH2</b>	Vitality and Viability
	<b>SH3</b>	Lewisham Market
	<b>SH4</b>	Impact of Lewisham Getaway on Southern Part of the Town Centre
	<b>SH5</b>	Core Shopping Areas
	<b>SH6</b>	Non-Core Shopping Areas
	<b>SH7</b>	Retail Character Areas
	<b>SH8</b>	Criteria for Evening Economy Uses
	<b>SH9</b>	Town Centre Boundary
<b>Urban Design</b>	<b>URB1</b>	Tall Buildings in Lewisham Town Centre
	<b>RRB2</b>	Sustainability
	<b>URB3</b>	High Quality Design
	<b>URB4</b>	Mixed Use
	<b>URB5</b>	Urban Enclosure, Grain
	<b>URB6</b>	Public Realm
	<b>URB7</b>	Enhancing Lewisham's Waterways
<b>Employment</b>	<b>EMP1</b>	Employment Uses in Lewisham Town Centre
	<b>EMP2</b>	Office Uses in Lewisham Town Centre
<b>Open Space</b>	<b>OS1</b>	Retention of Metropolitan Open Land
	<b>OS2</b>	Waterlink Way Celebrating the River Confluence
	<b>OS3</b>	Enhancing Open Space and Biodiversity
	<b>OS4</b>	Nature Conservation
<b>Transport</b>	<b>TRS1</b>	Lewisham Town Centre Parking Standards
	<b>TRS2</b>	Existing Public / Shopper Parking Spaces in the Town Centre
	<b>TRS3</b>	Cycling and Walking Routes
	<b>TRS4</b>	Mitigating Against the Impact of Roads and Roundabouts
	<b>TRS5</b>	Travel Plan
<b>Environment</b>	<b>ENV1</b>	Protect and Enhance the Environs of the River
	<b>ENV2</b>	Flood Plain

Thematic Policies		
Community and Leisure	COM1	Leisure Centre
	COM2	A New Secondary School for the Town Centre
	COM3	Range of Community, Leisure and Entertainment Spaces
	COM4	Major Developments
Implementation	IMP1	Monitoring
	IMP2	Compulsory Purchase Order Powers
	IMP3	Lewisham Town Centre S106 Pooling and Priorities
	IMP4	Partnership and consultation
	IMP5	Infrastructure and Services
	IMP6	Transport Capacity

Table 5-18 Draft Opportunity Area Policies

Opportunity Area Policies	
LTCOPP1	<b>Lewisham Gateway</b>
LTCOPP1a	General Principles for Lewisham Gateway
LTCOPP2	<b>Lewisham Centre and Adjoining Land</b>
LTCOPP2a	Entrances and Routes
LTCOPP2b	Urban Form
LTCOPP2c	Public Realm
LTCOPP2d	Vehicular Servicing and Parking
LTCOPP2e	Molesworth Street Frontage
LTCOPP2f	Land South of the Shopping Centre
LTCOPP2g	Land North East of the Shopping Centre
LTCOPP2h	Molesworth Street surface car park site
LTCOPP2i	Citibank Tower
LTCOPP2j	Lewisham High Street and Market
LTCOPP3	<b>Lee High Road</b>
LTCOPP3a	Lee High Road Western End
LTCOPP3b	Lee High Road Eastern End
LTCOPP3c	Clarendon Green
LTCOPP4	<b>Loampit Vale</b>
LTCOPP4a	Loampit Vale South - a mixed use urban centre
LTCOPP4b	East Side of Elmira Street
LTCOPP4c	West of Elmira Street
LTCOPP4d	Thurston Road Opportunity
LTCOPP4e	Land West of Jerrard Street

<b>LTCOPP4f</b>	Land East of Jerrard Street
<b>LTCOPP4g</b>	Railway Strip
<b>LTCOPP5</b>	<b>Conington Road</b>
<b>LTCOPP5a</b>	Northern Link
<b>LTCOPP5b</b>	Tesco Block
<b>LTCOPP5c</b>	Car Park and Petrol Station
<b>LTCOPP6</b>	<b>Engate Street</b>
<b>LTCOPP6a</b>	Engate Street Mixed Use Block

### 5.2.1 Assessment of the plan policies

The SEA Directive and related UK regulations require the SA to identify, describe and evaluate the likely significant effects on the environment of implementing the AAP.

The AAP policies were assessed in terms of their impact against each objective in the Sustainability Appraisal Framework set out in the Table 4-3.

The draft plan policies have been assessed against the “do nothing/business as usual” scenario, to provide a baseline. The predicted effects and assessment of the “do nothing/business as usual” scenario are set out in Appendix B of this report (SA of the Preferred Options Faber Maunsell / AECOM 2007; Table 8).

The results of the assessment are shown in the SA of the Preferred Options Faber Maunsell / AECOM 2007 Thematic Policies; Table 9 and Table 10, and Table 12 for the Opportunity Area Policies.

A characterisation which formed the basis for predicting the effects of the policies, and a detailed assessment for each policy showing how the summary assessment was derived is also set out in the SA of the Preferred Options Faber Maunsell / AECOM 2007 (Annex D).

The SA highlighted predicted significant negative effects of the plan policies in relation to:

- Noise pollution; and
- Waste minimisation.

Additional negative effects of the plan policies have been predicted in relation to:

- Water use;
- Air Quality; and

- Employment.

### **Mitigation**

The predicted effects, objectives affected, and proposed mitigation measures are summarised in Table 5-19 below.

### **Uncertainties and risks**

The following uncertainties were also outlined with the SA of the Preferred Options 2007:

The nature, scale and relative magnitudes of effects of the plan policies can be predicted with some confidence. However, there is considerable uncertainty regarding the actual quantitative effects of the proposed policies. The greater part of the effects, which the plan is considered to give rise to will occur over the lifetime of the buildings and infrastructure, developed as a result of the plan policies.

Effects related to building energy use, waste management, and travel preferences for work and leisure; for example, change over time due to policies and attitudes beyond the scope of the plan. Effects which may result directly from the plan, such as those arising immediately during the construction of buildings and infrastructure (e.g. noise, dust, construction jobs) often depend strongly on implementation.

The proposed monitoring plan suggests the data, in the form of indicators that could be gathered to improve the quantitative understanding of the effects of the Area Action Plan.

The Sustainability Appraisal has considered the predicted effects of the proposals being fully implemented. If only some phases or parts of the Plan are implemented, then there may be negative effects that are not mitigated. For example provision of additional housing without appropriate amenities.



Table 5-19 – Preferred Options - Predicted Effects, Objectives Affected, and Proposed Mitigation Measures

Ref	Topic	Comments/ Mitigation
Soc12	Noise	<p>The impacts of increased noise can be limited (by controlling when noise and vibration occur, for how long and at what levels) but not entirely eliminated.</p> <p>Unnecessary noise and vibration can be prevented by strict enforcement.</p> <p>Proposals:</p> <ul style="list-style-type: none"> <li>• Current noise levels should be surveyed to establish the current situation. Noise levels should be monitored adjacent to sensitive sites (e.g. dwellings and offices) during development works.</li> <li>• Developers should be asked at the planning stage to draw up a plan for mitigating noise impacts on sensitive sites including, for example: routing construction traffic away from sensitive sites; agreeing neighbourly site working schedules; noise monitoring during works; careful choice of plant to minimise noise on site; choice of lower noise construction techniques (e.g. for piling); plans for liaising with local stakeholders and responding to complaints.</li> <li>• The timing of different works, including works outside the plan area should be considered when assessing potential noise and disruption and planning mitigation.</li> </ul>
Env5	Waste and recycling	There would be short to medium-term impacts from construction activities that would have to be minimised through the implementation of Construction Site Management Plans.
Env6	Water use	New development will inevitably lead to an increase in water use. Water efficiency can be achieved through the implementation of appropriate measures in developments.
Env7	Air quality	There will be short to medium term impacts from construction activities, but measures to promote sustainable transport and the creation of additional open spaces should be beneficial in the long term
Eco4	Employment opportunities	There will be positive effects in the short to medium term with employment generated from the construction industry. The long term effects will depend on the type of retail and commercial uses to be developed.

### 5.3 Consultation on Preferred Options

#### 5.3.1 Key areas of feedback from consultation

- The following points highlight the principal feedback on the preferred options consultation which took place in June 2007.
- Comments on the scope of the AAP and overlap with other documents in the LDF including the Core Strategy. For example, the lack of a specific policy position on affordable housing within the LTC AAP.
- There is potential to include a Lewisham town centre specific flooding policy.
- Clarification is required in relation to the delivery and implementation of the key sites, many of which are coming forward as schemes, or benefit (in part at least) from planning consents.
- Objections to what is perceived as a relaxed approach to employment land and Metropolitan Open Land.
- Opportunities for decentralised energy networks and de-centralised power need to be investigated further as the AAP progresses.
- Sites policies are considered to be over-prescriptive by some consultees. In addition, there was an objection in relation to the use of the term 'Opportunity Area' which is already established in policy terms at the sub-regional scale.
- Requests to review the approach to Conington Road, Engate Street and the Lewisham Centre.
- Update references to Lewisham Gateway scheme which now has consent.
- Greater detail sought in relation to the approach to developer contributions in Lewisham which is now set out in the Planning Obligations SPD. Specific requirements on a site by site basis will be set out in the AAP.
- Need to strengthen the approach to the evening economy.
- A number of specific and detailed objections or statements of aspiration in relation to the Lewisham Gateway scheme.

### 5.4 Town Centre Area Action Plan Further Options Report

#### 5.4.1 Policies

This process has enabled the identification of an updated list of options and emerging policy statements which will form the basis of the pre-submission AAP in spring 2012.

The Further Options Report should be read in conjunction with the Preferred Options Report (2007) to get a full picture of the options / preferred options process. The

process of options identification and preferred options selection is discussed within the Further Options Report.

### **5.5 Town Centre Area Action Plan Further Options**

Strategic Environmental Assessment / Sustainability Appraisal is an iterative process and following revised Government guidance and more detailed work on other Development Plan Documents, including the Core Strategy, it was decided that the AAP should be more focused on addressing specific town centre issues. Therefore a Further Options Report was produced by Urban Practitioners: Lewisham Town Centre Area Action Plan Further Options Report March 2011<sup>xii</sup> and the Sustainability Appraisal Report 2010<sup>xi</sup>.

Within this report the number of draft policies were reduced to ensure that the AAP had an appropriate scope and focused on town centre specific issues only. The reduced scope does not mean that topics that have been left out are no longer important; it means that these topics are adequately addressed in other parts of the DPD or the Core Strategy.

The options generation process undertaken to date is located in Appendix A. Please refer to that section for further detail.

### **5.6 Significant environmental effects of the policies and proposals**

The SEA Directive and related UK regulations require the SA to identify, describe and evaluate the likely significant effects on the environment of implementing the AAP.

The prediction of likely effects involves adopting an evidence based approach to:

- Identify the changes to the environmental baseline which are predicted to arise from the implementation of the AAP.
- Describe these changes in terms of their magnitude, geographical scale, time period over which they will occur, whether they are permanent or temporary, positive or negative, the level of probability of the effect eventuating and any secondary, cumulative and/or synergistic effects.

Predictions and evaluations may be both qualitative and / or quantitative but must be based on evidence. The SA expresses the likely predicted and evaluated effects of the AAP with a series of matrix tables using a scaled approach as shown overleaf.

Table 5-20 Key Matrix Scores

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

5.6.1 *Appraising the AAP Area Wide Spatial Policies and Character Areas*

This section sets out a summary of the main issues resulting from the appraisal of the AAP FO area wide spatial policies and the appraisal of the character area policies (formerly opportunity area policies) against the SA Framework set out in the Table 4-3.

The full policy appraisal matrices are presented in Further Options Sustainability Appraisal Report 2010 Appendix 1 produced by Urban Practitioners. The results are summarised below.

**Key benefits**

**Housing and mixed use**

- The provision of new homes above empty offices or vacant premises was identified as a significant positive impact, as it will contribute towards achieving SA objectives SOC1 and SOC2 and also ENV10 through promoting the reuse of vacant buildings.
- The objective SOC7 is met by encouraging people to live above commercial units in the centre of the town as this would provide natural surveillance in the area throughout the day and evening.
- Policy URB4 promotes mixed use development in the town centre and particularly high density residential development above ground floor level. This policy therefore also contributes very positively to SA objectives SOC1 and SOC2 and positively towards achieving SOC7 and ENV10.

**Shopping**

- Significant positive economic impacts were identified in terms of policy SH2 as the policy promotes new retail and a sustainable mix of town centre uses and improvements to the shopping environment, which will help to improve the attractiveness of the town centre to both users and potential investors.

- Policy SH5 and SH3 also scored positively as they seek to protect existing A1 retail units and Lewisham Market. Retaining retail floorspace and increasing it where possible is essential to achieve Lewisham's wider objective of achieving Metropolitan retail status.
- Policy SH7 identifies different retail character areas in the AAP area and requires developments within each area to take account of its retail character. This contributes significantly towards achieving SA objective ECO1, in increasing the diversity of retail offered.

### **Design, public realm and movement**

- Policy URB6 sets out criteria for the design of the public realm In Lewisham Town Centre, including requirements for public art and improvements to pedestrian connections.
- Policy URB6 also scored particularly well against SA objectives ENV3 (sustainable transport) and ENV10 (maintain and enhance landscapes and townscapes).
- This policy also seeks to enhance community safety through ensuring the design of new development provides overlooking of entrances and exits and defines and addresses public spaces.

### **Environment**

- New policy 1 sets out requirements to reduce carbon dioxide emissions in Lewisham Town Centre. This policy therefore contributes very positively towards the achievement of ENV1 and ENV4 as it promotes the use of renewable energies and will help to ensure the town centre is resilient to climate change in the future.
- A potential conflict was flagged up in the appraisal process in terms of the impact on air quality as initial options included the potential for the promotion of biomass for energy generation on-site. However this was identified as having a potentially negative impact on the AQMA as the burning of biomass and the transportation of wood chip to the boiler could potentially have a negative impact upon the air quality of the area. Therefore as a result of the identification of this issue the use of biomass is not promoted in the final policy.

### **Key conflicts**

#### **Open space**

- The loss of Metropolitan Open Land (MOL) in association with the development of Lewisham Gateway and Loampit Vale was identified as a

significant negative impact in terms of SA objective SOC13, to increase the quality and provision of publicly accessible open space. However, the quality of the existing MOL is poor, as it consists of narrow strips of space alongside roads, railways and rivers and is not a large expanse of open space, therefore it is currently not truly performing the function of MOL. The approach taken to MOL is discussed in detail and appraised fully in the Core Strategy SA.

## **Flood Risk**

- The majority of Lewisham Town Centre has been identified as a high or medium risk of flooding; therefore many of the site specific policies conflict with the SA objective ENV2.
- The Central, Loampit Vale and Lee High Road character areas are affected by flood zone 3a and residential uses are promoted within these areas. As residential uses are classified as “more vulnerable” uses in PPS25 a sequential and exception test are required to demonstrate that the proposals are acceptable.
- The SFRA identifies some of the mixed use employment development sites as being located within Flood Zone 3a. This means a high probability of flooding and development may only be considered following application of the Sequential Test required by PPS 25. Having applied the sequential test these sites are considered acceptable for redevelopment.
- However, there will be a need for mitigation as part of the detailed design of individual buildings. It should also be recognised that these sites are protected by the Thames Barrier from flood risk. Policies will also reduce the amount of hard surfaces by requiring the provision of gardens, green roofs, SUDS etc.

## **Transport**

- Policy TRS2 seeks to retain the quantum of existing public/shopper car parking spaces in the town centre as a minimum level, and requires additional spaces in combination with any new retail development. The level of parking provided in a town centre such as Lewisham will be important to secure its competitiveness and differentiate its offer from other nearby shopping centres, and therefore support Lewisham’s bid to become a Metropolitan retail centre.
- This conflicts with a number of the sustainability objectives, in particular ENV3 as by retaining/increasing parking spaces in the town centre, the policy is facilitating the use of the private motor vehicle for shopping trips to the town centre.

## Employment

- EMP1 protects the Molesworth Street area as an employment site and states that in general employment uses will be sought to be retained; however the policy sets out the circumstances in which conversion of employment sites will be allowed, therefore the appraisal notes that there is potential for conflict with the economic growth if this is not carefully implemented.

## Resource use

- Encouraging new retail and improvements to the shopping environment will lead to an increase in resource use.

## Heritage Assets

- Following consultation of the AAP Further Options Report with English Heritage the responses received identified a weakness in the appraisal results with regard to the historic environment.
- The following Policy has now been inserted into the AAP,
  - Policy LAAP23: Heritage assets

## 5.7 Significant environmental effects of the AAP Area Proposed Submission Version

The AAP FO SA Report was consulted on alongside the AAP FO Report. Following consultation additional policies have been included within the AAP Proposed Submission Version these include:

- Policy LAAP19: Student Housing
- Policy LAAP19: Tall Buildings
- Policy LAAP23: Heritage assets
- Policy LAAP25: Adapting to climate change

Minor changes have been made to the following policies;

- Policy LAAP 11: Employment Use. Hotel Use is a new element at the Pre-Submission stage.
- Policy LAAP3: S2 Kings Hall Mews, Lewisham Gateway
- Policy LAAP4: Loampit Vale Town Centre Area
- S3 Railway Strip

- Policy LAAP5: Conington Road Town Centre Area
- Policy LAAP7: Ladywell Town Centre Area
- S6 Tesco block, car park and petrol station - Additional site specific requirements:

Appendix A of this report, compares the AAP FO March 2011 Area Wide policies and AAP Proposed Submission Version Area Wide policies and highlights where further SA is required.

The SA matrices for the new policies and amendments that required further SA are available below in Table 5-22.

The following key was used:

Table 5-21 Key

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

### 5.7.1 Results of new policy appraisals

The SA highlighted predicted negative effects of the plan policies in relation to:

- Possible conflicts with heritage assets and the historical environment may occur with the construction of new developments and tall buildings;
- Increased population density may lead to increased levels of crime;
- Construction will increase as will temporary construction traffic, leading to temporary negative impacts on air quality, resource use;
- Development situated within Flood Zone 3a scores negatively towards many environmental objectives and may impact the economy long term depending on how it is implemented;
- Resource use with increase.

### Mitigation

Proposed mitigation measures are summarised below and included in Table 5-19.



- Heritage assets should be protected during construction and tall buildings placed in appropriate locations;
- 'Secured by design' principles should be applied;
- Mixed use development within the AAP area should be promoted to create a safer environment;
- Liaison with the Environment Agency is essential to ensure development within the flood zone is appropriate;
- Ensure climate change adaptation techniques are incorporated into the AAP area and produce a surface water management Plan;
- Promote Site Waste Management Plans;
- Promote the use of recycled, locally sourced, sustainable materials for use in construction and operation of all new developments and refurbishments;
- Promote the use of water and energy efficiency measures.

Table 5-22 New Policy Appraisals

New Policies	Sustainability Objectives																												Comments
	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Env10	Eco1	Eco2	Eco3	Eco4	Eco5	
Policy LAAP13: Student Housing	+	+	0	+	0	+	0	0	0	0	0	+	0	++	++	++	++	++	++	++	0	0	0	0	0	+	0	0	<p><b>Social:</b> Positive to providing good quality affordable house for students, which is accessible and inclusive</p> <p><b>Environment:</b> sustainable and accessible student housing is positive to many environmental objectives</p> <p><b>Economic:</b> positive to the evening economy as student accommodation would provide an increased market demand for evening leisure</p>
Policy LAAP19: Tall Buildings	0	0	0	0	+	0	0	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0	<p><b>Social:</b> Tall buildings placed in appropriate places will enhance the urban environment</p> <p><b>Environment:</b> positive to climate change adaptation, tall buildings will be placed in areas adaptable to changing weather conditions</p>
Policy LAAP23: Heritage assets	0	0	0	0	++	0	0	0	0	0	0	0	0	-	0	0	-	0	0	0	0	-	0	0	0	-	0	0	<p><b>Social Environment economic</b></p> <p>Very positive to the protection of heritage assets, however conflict</p>

New Policies	Sustainability Objectives																												Comments	
	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Env10	Eco1	Eco2	Eco3	Eco4	Eco5		
																														may arise as restraints are imposed upon new developments and prevent economic growth.
Policy LAAP25: Adapting to climate change	0	0	0	0	-	0	0	0	0	+	+	0	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Social:</b> Adapting to climate change will create a safe, accessible urban environment, which will be positive to human health, possible conflicts with heritage assets and the historical environment</p> <p><b>Environment:</b> Overall very positive to the environment, use of appropriate materials, however materials should be locally sourced where appropriate. Flood risk will be maintained and biodiversity will be enhanced with the planting of appropriate vegetation and green roofs.</p> <p><b>Economic:</b> Long term adapting to climate change will be positive to the economy, and will promote the use of eco technology</p>

New Policies	Sustainability Objectives																											Comments	
	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Env10	Eco1	Eco2	Eco3	Eco4		Eco5
Policy LAAP 11: Hotel Use	0	0	0	+	-	0	0	0	0	+	0	-	0	++	++	++	+	+	-	-	+	0	+	0	0	+	+	+	<p><b>Social:</b> Positive to increased accessibility and pedestrian safety possible conflicts heritage assets.</p> <p><b>Environment:</b> Positive to climate change adaptability and reduction in congestion by increasing pedestrian access, possible conflicts new buildings require use of resources.</p> <p><b>Economic:</b> Positive to the economic environment, will boost the local economy and provide local employment opportunities, further enhancement could include apprenticeship schemes and skill development during construction. Student accommodation would provide an increased market demand for evening leisure</p>
Policy LAAP4: Loampit Vale Town Centre Area.			0	++	+			0		++	+	-	+		+	++	0	0	-	-	-	0	++	+	+	+			<p><b>Social:</b> New housing will be provided, increased access with good urban design, however affordable housing should be provided</p>

New Policies	Sustainability Objectives																											Comments	
	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Env10	Eco1	Eco2	Eco3	Eco4		Eco5
																													<p>complying with decent homes standards. Conflicts: increased population density may lead to increased levels of crime, unsure how the policy will assist with reducing poverty and deprivation. Construction will increase as will construction traffic, leading to temporary negative impacts on air quality, resource use. Development situated within Flood Zone 3a scores negatively towards many environmental objectives and may impact the economy long term depending on how it is implemented.</p>
<p><b>Policy LAAP7: Ladywell Town Centre Area</b></p> <p>4. There may be smaller development opportunities fronting Ladywell Road. All developments should provide a mix of uses suitable to an edge of town centre location and ensure active frontages to streets.</p>	0	0	0	0	0	+	0	0	+	0	0	0	0	0	0	0	+	+	0	0	0	0	+	+	0	+	+	+	<p><b>Social:</b> Should improve access to amenities</p> <p><b>Environment:</b> Any new developments will increase resource use. This policy promotes the Lewisham Low Carbon Zone; therefore this is positive to renewable energy and carbon reduction.</p> <p><b>Economic:</b> positive to the local economy</p>

New Policies	Sustainability Objectives																												Comments
	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Env10	Eco1	Eco2	Eco3	Eco4	Eco5	
<b>Policy - S6</b> Tesco block, car park and petrol station - Additional site specific requirements			+	++	+		+	0		+	0	-	0	-	-	-	0	0	-	-	-	-	+	+	0	+		+	<b>Social:</b> New housing will be provided, increased access with good urban design, however affordable housing should be provided complying with decent homes standards. Possibly conflicts: increased population density may lead to increased levels of crime, unsure how the policy will assist with reducing poverty and deprivation. Construction will increase as will construction traffic, leading to temporary negative impacts on air quality, resource use. May impact the economy long term depending on how it is implemented. however good urban design and good quality frontages will be beneficial to the local economy

## 5.8 Equalities Analysis Assessment

### 5.8.1 Introduction

An Equalities Analysis Assessment or EqAA enables a service or function to assess the possible implications on the whole community (including staff) when changes are proposed to the way a service is delivered, through policies, strategies, procedures, projects, reviews, organisational change or savings proposals. The EqAA followed standard procedures for the production of such a report to ensure a fair and appropriate assessment was performed. In brief, it assessed each of the preferred options identified by the Council in the Lewisham Town Centre Area Action Plan Further Options Report against eight equalities 'target groups'.

### 5.8.2 Summary of findings

It has been seen that a number of preferred options will have a positive impact upon equalities groups when they are delivered. The planned development will bring a number of improvements to the town centre, including enhanced accessibility; greater employment opportunities, better housing choice and design lead safety schemes.

Three potentially negative policy impacts have been identified, relating to residential access, parking and development in Flood Zone 3a. It was not deemed necessary to remove any of the preferred options and not take them forward to the AAP draft plan. Alternatively, a number of mitigatory measures have been suggested by the EqAA to protect the target groups. Further detail is available in the full EqAA<sup>xiv</sup>.

### 5.8.3 Monitoring

The Council understands the importance of monitoring the implementation of plans and developments to ensure that the findings of the EqAA are put in place. Therefore, relevant measures have been included in the AAP draft plan monitoring framework.

Monitoring arrangements in the Lewisham Annual Monitoring Report (AMR) will enable the Council to examine and assess more closely the implementation of policies in the AAP once they are adopted, and how they impact on equalities issues. Monitoring will be undertaken by the Planning Management Team, Resources & Regeneration Management Team, the Corporate Equalities Board and Mayor and Cabinet.

## 5.1 The Habitat Regulations Assessment (HRA)

### 5.1.1 Process

The purpose of a HRA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a Natura 2000 site (also known as a European Site) and to ascertain whether that plan would adversely affect the integrity of such a site.

Guidance from the Department of Communities and Local Government (DCLG) on Habitat Regulation Assessment summarises the HRA process prescribed in Article 6(3) and (4) of the Habitats Directive into three main stages:

- Task 1 Assess likely significant effects.
- Task 2 Appropriate Assessment and ascertaining the effect on site integrity.
- Task 3 Mitigation and alternative solutions.

Task 1 of the process is to identify whether the plan policy is 'likely to have a significant effect' on a European site, referred to as 'Screening'. If the Screening process identifies the potential for significant adverse impacts on Natura 2000 sites, tasks two and three of the HRA need to be completed.

In accordance with the Habitat Regulations a HRA is required when, in view of a European site's objectives, a land use plan:

- is likely to have a significant effect on a European site (Natura 2000 site) in Great Britain (either alone or in combination with other plans and/or projects); and
- is not directly connected with or necessary to the management of the site.

#### 5.1.2 *Outcome*

A Habitats Regulations Assessment screening report was undertaken in January 2012 on the Lewisham Site Allocations Development Plan Document and the Lewisham Town Centre Area Action Plan at pre-submission stage, in compliance with the Habitats Directive (92/43/EEC) and the Regulations.

There are no designated European sites within the London Borough of Lewisham. Through consultation with Natural England, the European sites assessed were those located within a 15 kilometre radius of the borough boundary as they were considered to be in close enough proximity to potentially be impacted. The report identifies Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation and the Lee Valley Special Protection Area (the Natura 2000 sites) for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors were presented. The report provides details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that a site allocation or policy set out in the proposed submission plans, would have on the European sites. This includes in combination and cumulative effects.

The screening report observes that none of the site allocations or policies in either plan at pre-submission stage, on their own or in combination with other plans or projects, are likely to result in significant adverse impacts on European Sites. In particular, the proposed site allocations and policies are unlikely to result in a



significant effect on the primary reasons for the designation of the European Sites and there is therefore no need to undertake Task 2 and Task 3 of the Habitats Regulations process.

## 5.2 Cumulative and long term effects

Many environmental problems result from the accumulation of multiple small and often indirect effects, rather than a few large and obvious ones. Examples include loss of tranquillity, changes in the landscape, loss of open space, and climate change.

Cumulative effects can arise where several developments each have effects but combined together have a significant effect, or where several individual effects of a plan (e.g. noise, dust and visual) have a combined effect.

Cumulative effects have been considered throughout the SA and development of the AAP. The cumulative effects of other plans and programmes were considered within Stage A of the SA process.

Core Strategies set out the key elements of a Local Authority's planning vision and strategy and form the central part of the Local Development Framework (LDF). All other LDF documents must be consistent with the Core Strategy. Therefore all policies within the AAP must be consistent with those in the Core Strategy.

The Lewisham town centre AAP is directly influenced by the Lewisham Core Strategy and is in conformity with it at all times.

### 5.2.1 Assessment of cumulative effects

Assessment of cumulative effects focuses on identifying the total impact of both direct and indirect effects of a plan on receptors. Receptors may include natural resources (e.g. air, water, soil, landscape), sections of the population (e.g. people living in particular areas or vulnerable members of the community) or ecosystems and species.

The likely significant effects on the environment of the AAP Proposed Submission Version including short, medium and long-term effects, permanent and temporary effects, and secondary, cumulative and synergistic effects were identified and discussed throughout the SA of the options and policies within the AAP.

There are many potential and complex interactions between the AAP and the environment, and many of the impacts predicted are cumulative in their nature but difficult to predict with certainty.

Implementation of the AAP may result in cumulative negative effects on air quality, landscape, soils, biodiversity, water quality and climate change, as can development pressure on land use in general.

However, without implementation of the AAP i.e.: the “business as usual” scenario, the impacts will be far greater, for example ‘ad hoc’ development is more likely and urban design principles will not be applied, resulting in further degradation of the urban environment, that will not promote active travel, include climate change adaptation techniques, reduce traffic congestion etc.

Taking into account the results of the SA at various stages, proposed mitigation measures have been included in the AAP in the form of policies, or revision of initially proposed policies, to ensure that negative effects are reduced.

The following summarises the cumulative effects identified in the SA FO Report produced by Urban Practitioners March 2011<sup>xi</sup>.

### **Economic**

There are likely to be positive cumulative effects on economic growth and employment with the retention and protection of strategic industrial locations and also the promotion of new retail within the town centre. The AAP also promotes a mixed use approach to sites, including new homes and evening economy uses, thus improving the diversity of the town centre offer and ensuring there is activity and vibrancy throughout the day and evening. The combined impact of this will help to improve the attractiveness of the town centre to users and potential investors and contribute towards achieving Metropolitan status, therefore there is likely to be a positive overall cumulative impact.

### **Environmental**

The implementation of New Policy 1 and URB4 in particular will help to improve the environmental quality of the town centre, and will have a positive cumulative impact upon the environment through helping to promote sustainable town centre living and low carbon development. The cumulative impact of developing within flood zones is potentially a negative impact, however the policies require that development is in accordance with PPS25 guidance and that the design should be developed in discussion with the Environment Agency and incorporate appropriate flood mitigation designs to reduce flood risk. Care will need to be taken to ensure that development here does not impact upon wider flood risk and the water environment.

### **Social**

The proposals are likely to impact positively on the social fabric of the borough through the provision of new high quality housing in a central and easily accessible location. New community facilities, improved public realm and social infrastructure will ensure that the area is able to cope with the new housing development, and improve the existing condition of the area for the existing residents

### 5.3 SA Report AAP Further Options Consultation Responses

The consultees included the three statutory bodies: Natural England, Environment Agency and English Heritage who were consulted with during the development of the Lewisham Town Centre AAP FO Report stage (March 2011<sup>xii</sup>).

*Table 5-23 and*

Table 5-24 below document the consultation responses received and explain how the issues raised have been addressed.

Table 5-23 SA Report AAP Further Options Consultation Responses Environmental Agency

Organisation	Environmental Agency
Comment	Response
<p>We are pleased to note that LB Lewisham's Strategic Flood Risk Assessment (SFRA) is referred to throughout the document. However, we would point out that it is a high level assessment covering the whole borough. We would reiterate our previous recommendation that a more detailed assessment of risk from all sources of flooding is carried out specifically to inform the major development sites within the Lewisham Town Centre Area.</p> <p><b>Lewisham and Catford Flood Alleviation Scheme</b></p> <p>A feasibility study is currently being undertaken for a £8m flood alleviation scheme which will protect 430 properties in Lewisham and Catford. It's essential the proposed flood alleviation scheme and ongoing regeneration are linked to ensure:</p> <ul style="list-style-type: none"> <li>▪ flood risk is managed carefully</li> <li>▪ river environments are improved as new development occurs, and</li> <li>▪ developer contributions are used where appropriate through partnership working.</li> </ul> <p>This will help deliver the joint vision and actions from the Ravensbourne River Corridor Improvement Plan.</p>	<p>Discussions between the Council and the Environment Agency continue to progress regarding both the process for undertaking more detailed flood risk assessments and for the continuing work on the flood alleviation scheme. At the current time there are not sufficient results to warrant modifying the AAP or the accompanying SA, however it is acknowledged that either may need to incorporate minor amendments before they are finalised if new or improved evidence becomes available.</p>
<p><b>2.1 Geographical Context</b> - Please acknowledge the role of the Environment Agency in preparing the River Ravensbourne Corridor Improvement Plan in the penultimate paragraph of this section.</p>	<p>The geographical context of the Proposed Submission version now includes acknowledgement of the Environment Agency role played.</p>

Organisation	Environmental Agency
Comment	Response
<p><b>2.2.2 Environment - Flood Risk</b> - This should mention the new responsibilities of the LPAs under the Flood and Water Management Act 2011. The Act gives LPAs responsibility for preparing and putting in place strategies for managing flood risk from groundwater, surface water and ordinary watercourses in their areas</p>	<p>The Flood and Water Management Act is now included in Table 4-1 and section 4.2.2</p>
<p><b>2.4 Objectives</b> - Objective 7 – Environment - We suggest this could be re-worded to include river restoration, that is, 'To protect, enhance and restore the Rivers Quaggy and Ravensbourne...' This also applies to preferred option LTC URB7, of which we are very supportive.</p>	<p>It is not appropriate to change the SA Objectives at the stage, these issues have been addressed across the whole borough by the Core Strategy Strategic Objective 6 and Policies 10 and 11. Further support is provided by the AAP Town Centre Area policies.</p>
<p>There is no mention of surface water flooding, however. The council should lead and coordinate the production of a Surface Water Management Plan (SWMP) that considers flood risk from surface water, groundwater and ordinary watercourses. The plan should include an assessment of flood risk from these sources and a programme of actions to manage these risks. A SWMP will help put in place:</p> <ul style="list-style-type: none"> <li>• support for greater use of Sustainable Drainage Systems (SuDS) to help avoid large investments in unsustainable hard infrastructure;</li> <li>• identify design approaches that avoid and reduce flood risk to and from new development (PPS 25);</li> <li>• information to improve emergency planning decisions for local authorities and awareness of surface water flooding when preparing for emergencies.</li> </ul>	<p>Since this request was made the Council have produced a draft Surface Water Management Plan for the borough.</p> <p>See Policy LAAP25: Adapting to climate change which also addressed some of these issues.</p>

Organisation	Environmental Agency
Comment	Response
<p>Area-wide spatial policies and sub-area specific policies. We are pleased to note that, although the policies in the previous version of the document relating to flood risk have been removed, flood risk is highlighted as an issue to be considered in the amended site specific policies. It is important that the benefits from buffer zones are highlighted with respect to site specific policies. Buffer strips help reduce the risk of/impact from flooding, provide environmental/ecological improvements to urban areas and also provide valuable amenity space.</p>	<p>Lewisham to ensure that this is addressed in the site specific policies. Policy LAAP25: Adapting to climate change which also addressed some of these issues.</p>
<p><b>Character Area Policy 4</b> - Lee High Road Our enforcement team have found evidence of plumbing misconnections at properties on Lee High Road which have resulted in foul water being discharged directly into the River Quaggy. We therefore welcome the key principles identified in this preferred policy to protect and enhance the river in this area.</p>	<p>No Action required</p>
<p><b>SA Objective Env7</b> - We would reiterate our advice regarding the protection of controlled waters and, in particular, groundwater quality. Lewisham Town Centre lies within Source Protection Zone 1 for a public water supply and is underlain by sensitive aquifers and so there may be constraints on drainage involving infiltration methods.</p> <p>Similar constraints may influence the suitability of other groundwork's carried out as part of future developments such as ground source heat pump schemes and foundation works. You may therefore wish to consider highlighting a potential conflict between DPD objectives 2 (housing) and 3 (sustainable design) with sustainability objective Env7 (water quality and use).</p>	<p>It is not appropriate to change the SA Objectives at the stage; This issue is concerned with a wider area than the town centre and has been dealt with through the process of producing the Core Strategy. It is not felt that specific reference to the issue in the AAP is necessary.</p>

Table 5-24 SA Report AAP Further Options Consultation Responses English Heritage

Organisation	English Heritage
Comment	Response
<p>Relevant plans, programmes and objectives - The European Landscape Convention, which was ratified by the United Kingdom government in 2006, can also be included. We recommend PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide is also referenced.</p>	<p>Included in Table 4-1</p>
<p>Summary of Key Sustainability Issues for the Area</p> <p>Comments on local heritage assets noted and supported. Sources should also include archaeology e.g. the English Heritage Historic Environment Record and the boroughs Archaeological Priority Areas. The English Heritage Heritage at Risk Register is another important source of information on the state of the historic environment in Lewisham.</p>	<p>Included in Table 4-2</p>
<p><b>Appraising the APP</b></p> <p>The indicator for the historic environment in Appendix 4 should be updated to include data from the English Heritage, Heritage at Risk Register (NB this does not just cover listed buildings).</p> <p>The possible conflict between new development and heritage values in the AAP objectives is noted on Page 40. Similarly, in the table on page 41, Objective 1 (retail), 2 (housing) and 4 (employment) of the DPD are shown to have a possible conflict with Soc5.</p> <p>Section 9.3 appraising the AAP area wide spatial policies and character areas is disappointing in relation to the historic environment (Soc5).</p> <p>There is no consideration of heritage issues in the key benefits, key conflicts, mitigation measures and cumulative/long term effects.</p>	<p>The following Policy has now been inserted into the AAP:</p> <ul style="list-style-type: none"> <li>• Policy LAAP23: Heritage assets</li> </ul>



Organisation	English Heritage
Comment	Response
Monitoring Appendix 5 should be updated to include data from the English Heritage at Risk Register (NB this does not just cover listed buildings).	See monitoring section 6.1.2

## 5.4 Proposed Mitigation Measures

Mitigation is one of the key outputs of the SEA and appraisal process. The SEA Regulations require that “*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*”<sup>iii</sup> must be documented in the Environmental Report.

Mitigation measures may themselves have adverse environmental effects which should be recognised. In identifying the need for mitigation and developing specific mitigation measures, attention has been given to the “mitigation hierarchy” set out in Table 5-25. The initial focus of the mitigation hierarchy is avoidance of adverse effects wherever possible.

Table 5-25 Mitigation Approach

Mitigation Approach	Comment
Avoidance or prevention	This involves modifying alternative options and policies for the AAP.
Reduction	At the level of SEA/SA mitigation could focus on timing or phasing to reduce adverse effects.
Offsetting or compensation	This approach is used where opportunities are not available to either avoid or reduce adverse effects.
Remediation	Remediation is used where an adverse effect is unavoidable but the long term effects can be reduced by restoring the affected area to its original state.
Enhancement	Although not strictly a measure to mitigate an adverse effect, enhancement is an opportunity to improve social, environmental and economic conditions. Enhancement could be used successfully to improve conditions.
Further information	Although the overall effects of the preferred options have been assessed through the SA there may be a degree of uncertainty as to the anticipated effects of specific project measures on the ground. In such circumstances mitigation could include specification of the need to conduct further assessments at the measure / scheme level e.g. EIA, HIA.

SA guidance requires the adoption of mitigating measures that will prevent, reduce or minimise as far as possible any significant adverse effects of implementing the AAP. The predicted effects of the AAP have been evaluated and this has highlighted the need to balance the economic objectives of increasing the diversity of retail offer and the provision of more affordable homes with the potential impact upon the environment in terms of the use of resources, flood risk, traffic and carbon emissions.

Mitigation measures for each predicted effect are discussed in the commentary section of the appraisal (SA FO Report produced by Urban Practitioners March

2011see Appendix 1<sup>xi</sup>). The appraisal matrices have been analysed for the purpose of this report to identify all the suggested mitigation.

Table 5-26 below summarises the required mitigation identified through the SA process (including this review) in relation to each SA Objective and the key sustainability issues identified and highlights the section or policy in the AAP where the mitigation is addressed.

Table 5-26 Mitigation and Where Addressed within the AAP

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
Social			
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	Provide affordable homes close to sustainable travel opportunities	Policies LAAP3 – LAAP8 all deal with the provision of housing in sustainable travel areas. This is supported by the Core Strategy over-arching policy regarding affordable housing (CSP1).
Soc2	To increase the provision of housing that meets decent homes standards	Ensure all new developments are compliant with decent homes standards	This is supported in over-arching Core Strategy policies CSP1, 12, 15 and 18. Additionally, the AAP policies regarding Public Realm (LAAP18) and Tall Buildings (LAAP19) are supportive.
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	Increase recreational access to the Quaggy and Ravensbourne rivers	Town Centre Area policies regarding Gateway (LAAP3), Conington Road (LAAP5), Lee High Road (LAAP6) and Ladywell (LAAP7) encourage improvements to the accessibility of both rivers and encourage the use of planning obligations for this purpose. Additionally, LAAP21 encourages improved access via cycling and walking routes.
Soc4	To increase the provision of accessible and inclusive everyday facilities	Ensure social infrastructure and community facilities are provided	LAAP22 relates directly to the provision of social and community infrastructure. This is supported through the delivery and monitoring policy (LAAP26) and the delivery strategy in Appendix 3. LAAP7 also encourages the use of planning obligations to support the delivery of community facilities.

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
Soc5	To protect and enhance heritage assets and their settings and utilise the historic environment in the creation of sustainable places	Protect heritage assets	LAAP23 ensures suitable protection is afforded to heritage assets in the town centre. This is supported by LAAP7 which specifically protects the concentration of historic assets in the Ladywell Town Centre Area.
Soc6	To protect and enhance cultural diversity and promote community cohesion and civic pride	Ensure social infrastructure and community facilities are provided	LAAP22 relates directly to the provision of social and community infrastructure. This is supported through the delivery and monitoring policy (LAAP26) and the delivery strategy in Appendix 3. LAAP7 also encourages the use of planning obligations to support the delivery of community facilities.
		Increase opportunities for cultural activities	
Soc7	To reduce crime levels in the town centre and reduce fear of crime	Ensure secured by design principles are applied to new developments and refurbishments	LAAP18 requires developers to demonstrate how they have taken 'Secure by Design' into account. This policy also supports good urban design alongside LAAP19 and a number of Core Strategy policies.
		Promote good urban design	
Soc8	To increase access to lifelong learning	Ensure social infrastructure and community facilities are provided	LAAP22 relates directly to the provision of social and community infrastructure, including education requirements. This is supported through the delivery and monitoring policy (LAAP26) and the delivery strategy in Appendix 3. LAAP7 also encourages the use of planning obligations to support the delivery of community facilities.
		Ensure sustainable affordable access is provided and maintained to education facilities for people of all ages	
Soc9	To improve access to amenities for vulnerable members of the community and reduce poverty and deprivation	Ensure inclusive sustainable affordable access is provided and maintained to all amenities and community facilities	This is dealt with by the over-arching Core Strategy Policy CSP19.
Soc10	To improve pedestrian safety in the town centre	Reduce traffic levels	Policies LAAP3 – LAAP8 encourage the delivery of car-free and car-limited developments where appropriate. This will assist in managing traffic
		Provide adequate walkways and good urban design	

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
		Ensure safe cycle routes are provided	<p>levels. The realignment of roads as part of the Lewisham Gateway development will also produce a safer and less onerous pedestrian environment and improve access between the transport interchange and the retail centre.</p> <p>Policies LAAP18 and LAAP21 require developments to make major improvements to pedestrian and cycling provision. This will enhance all major routes into the town centre and multiple cycle routes such as the Waterlink Way. Where appropriate policies LAAP3 – LAAP8 detail scheme specific improvements that are required as part of individual developments.</p>
Soc11	To improve inclusive access to local healthcare facilities and encourage healthy lifestyles through sustainable urban design	<p>Promote active travel</p> <p>Ensure inclusive sustainable affordable access is provided and maintained to all amenities and community facilities</p> <p>Ensure safe cycle routes and parking is provided</p> <p>Provide adequate walkways and good urban design</p>	<p>The realignment of roads as part of the Lewisham Gateway development will also produce a safer and less onerous pedestrian environment and improve access between the transport interchange and the retail centre.</p> <p>Policies LAAP18 and LAAP21 require developments to make major improvements to pedestrian and cycling provision and contribute towards the enhancement of the public transport network. This will enhance all major routes into the town centre and multiple cycle routes such as the Waterlink Way. Where appropriate policies LAAP3 – LAAP8 detail scheme specific improvements that are required as part of individual developments.</p> <p>Sustainable access to community facilities is dealt with by the over-arching Core Strategy Policy CSP19.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
Soc12	To reduce noise from road traffic, construction and industry	Current noise levels should be surveyed to establish the current situation. Noise levels should be monitored adjacent to sensitive sites (e.g. dwellings and offices) during development works.	The AAP policies direct development to the most appropriate locations in the town centre, and protect those areas that are more sensitive. While some disruption may be inevitable during construction, the long term benefits of sustainably located developments with reduced car parking are considerable.
		Noise complaints should be monitored	
		Considerate constructors schemes should be promoted through policy for all new developments	
Soc13	To increase the quality and provision of publicly accessible open spaces	Ensure public space is accessible to all	LAAP18 protects the public realm and ensures that new development leads to open space improvements. Due to the town centre location, there is little green space, but what exists is primarily supported by the Core Strategy open space policy (CSP12). LAAP18 supports both green space and hard space, such as plazas and the streetscape.
		Protect open space	
		Where loss of open space and Metropolitan Open Land (Mol) is unavoidable, open space replacement should be provided	
Environmental			
Env1	To ensure Lewisham town centre is resilient to climate change by using mitigation and adaptation measures through sustainable design and construction	Reduce CO <sub>2</sub> emissions	Matters relating to climate change, sustainable design, energy efficiency and air quality are dealt with comprehensively on a boroughwide level by Core Strategy Policies CSP7, CSP8 and CSP9. The AAP provides further detailed policies only where sites or the town centre location requires so.  LAAP24 details measures that are required by development to reduce CO <sub>2</sub> emissions, including the use and preparation for the emergence of decentralised energy networks.  LAAP25 ensures that developments remain sustainable in the long term and are adaptable to
		Ensure all new developments are energy efficient	
		Improve energy efficiency in existing buildings	
		Reduce traffic congestion	
		Ensure all new developments achieve BREEAM excellent accreditation	

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
			<p>climate change.</p> <p>Policies LAAP3 – LAAP8 encourage the delivery of car-free and car-limited developments where appropriate. This will assist in managing traffic levels. The realignment of roads as part of the Lewisham Gateway development will also produce a safer and less onerous pedestrian environment and improve access between the transport interchange and the retail centre.</p> <p>Policies LAAP18 and LAAP21 require developments to make major improvements to pedestrian and cycling provision and contribute towards the enhancement of the public transport network. This will enhance all major routes into the town centre and multiple cycle routes such as the Waterlink Way. Where appropriate policies LAAP3 – LAAP8 detail scheme specific improvements that are required as part of individual developments.</p>
Env 2	To reduce and manage the risk and effects of flooding	<p>Encourage the use of green roofs, SUDS</p> <p>Ensure appropriate flood mitigation are incorporated into designs</p> <p>Enhance and restore the Rivers Quaggy and Ravensbourne</p> <p>Ensure Surface Water Management Plan (SWMP) is developed and applied through-out the AAP area</p>	<p>Matters relating to flooding are dealt with comprehensively on a boroughwide level by Core Strategy Policies CSP10 and CSP11. The AAP provides further detailed policies only where sites or the town centre location requires so.</p> <p>Policies LAAP3 – LAAP8 detail, where appropriate, the actions that are required to mitigate against flood risk in each location. The policies require Flood Risk Assessments and close working with the</p>



Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
		<p>Consider using buffer strips to help reduce the risk of/impact from flooding, and provide environmental/ecological improvements to urban areas and also provide valuable amenity space.</p> <p>Prevent pollution to all water courses</p> <p>Ensure protection of Source Protection Zone (SPZ) 1</p>	<p>Environment Agency.</p> <p>Policy LAAP25 specifically encourages a number of measures that are vital for reducing flood risk including, living roofs and walls, water saving measures, SUDS, vegetation and planting, siting and design of buildings and the use of materials.</p>
Env3	To reduce dependency on private cars through enhancing pedestrian, cycle and public transport routes throughout the town centre	<p>Promote active travel</p> <p>Ensure safe cycle routes and parking is provided</p> <p>Provide adequate walkways and good urban design</p>	<p>Policies LAAP3 – LAAP8 promote development in the most sustainable locations, much of which is car-free or car-limited. This will encourage the use of sustainable transport methods such as the bus, rail and DLR routes that serve the town centre and also walking and cycling.</p> <p>The realignment of roads as part of the Lewisham Gateway development will also produce a safer and less onerous pedestrian environment and improve access between the transport interchange and the retail centre.</p> <p>Policies LAAP18 and LAAP21 require developments to make major improvements to pedestrian and cycling provision. This will enhance all major routes into the town centre and multiple cycle routes such as the Waterlink Way. Further, LAAP21 will deliver improved frequency, quality, accessibility and reliability of the public transport network. This will help reduce reliance on car use, relieving pressure on roads and car parking, has the potential to reduce air pollution levels and generally contribute to the environmental sustainability objectives of the AAP.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
			Where appropriate, policies LAAP3 – LAAP8 detail scheme specific improvements that are required as part of individual developments.
Env4	To increase on-site renewable energy provision	Promote the use on-site renewable energy provision	Core Strategy Policy CSP8 details the borough-wide requirements for developments to supply renewable energy. The AAP expands upon this in LAAP24, which details measures that are required by development to reduce CO2 emissions, including the use and preparation for the emergence of decentralised energy networks.
Env5	To increase the energy efficiency performance of existing buildings	Promote energy efficiency designs in developments for example, solar, wind, passive solar	The Code for Sustainable Homes and BREEAM standards required are set on a borough-wide basis in Core Strategy Policy CSP8. AAP Policy LAAP13 ensures that the same standards are followed for Student Housing.
		Ensure all new developments achieve BREEAM excellent accreditation	
Env6	To reduce the consumption of materials and resources and the production of waste and increase the amount of waste recycling	Promote the reuse and recycling of waste from all streams	Waste management policy is dealt with on a borough-wide basis in the Core Strategy (CSP13).
		Promote the use of site waste management plans	
		Promote the use of locally sourced sustainable materials	
Env7	To provide sustainable sources of water and promote water efficiency	Promote water efficiency designs in developments for example, rain water harvesting, water recycling	LAAP25 promotes water saving measures in support of Core Strategy Policy CSP8.
		Ensure all new developments achieve BREEAM excellent accreditation	The Code for Sustainable Homes and BREEAM standards required are set on a borough-wide basis in Core Strategy Policy CSP8. AAP Policy LAAP13 ensures that the same standards are followed for Student Housing.

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
Env8	To improve air quality	Reduce traffic congestion and car use	<p>Core Strategy Policy CSP9 sets out the borough-wide policy on air quality. The AAP adds detail to the requirements on a site by site basis.</p> <p>Policies LAAP3 – LAAP8 encourage the delivery of car-free and car-limited developments where appropriate. This will assist in managing traffic levels.</p> <p>Policies LAAP18 and LAAP21 require developments to make major improvements to pedestrian and cycling provision. Further, LAAP21 will deliver improved frequency, quality, accessibility and reliability of the public transport network. This will help reduce reliance on car use, relieving pressure on roads and car parking, has the potential to reduce air pollution levels and generally contribute to the environmental sustainability objectives of the AAP.</p> <p>Meanwhile, the Gateway scheme will improve access from the transport interchange to the retail centre.</p>
Env9	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies	<p>Promote enhancements of biodiversity through green roofs, green walls, creation of open space, roof gardens, planting of street trees</p> <p>Prevent flood risk and surface run off through the implementation of SUDS, greens roofs etc</p> <p>Promote permeable surfaces where appropriate</p>	<p>LAAP18 Public Realm and LAAP25 Adaptation to Climate Change promote the provision of green spaces and flood reducing features, including living roofs and walls, open space, street trees, SUDS and permeable materials.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
Env10	To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape	Reduce the amount of derelict	The AAP Spatial Strategy LAAP2 and the Town Centre Area policies LAAP3 – LAAP8 detail the available land for redevelopment in the town centre. This in turn reduces the amount of derelict and available land. LAAP18 and LAAP19 and aspects of LAAP3 – LAAP8 then support the overarching policies of the Core Strategy to ensure good urban design.
		Reduce the amount of contaminated land	
		Encourage good urban design	
Sustainable economic growth			
Eco1	To increase the diversity of the retail offer	Encourage small independent mixed local business	<p>Policies LAAP 9 and 14 support the retail growth of the town centre as well as the development encouraged by the site policies of LAAP3 – LAAP8. More specifically LAAP16 defines retail areas of different types, promoting large scale retail in the central 'primary shopping area', while protecting other retail areas and encouraging small local businesses.</p> <p>The Core Strategy employment policies CSP3 – CSP5 apply to the town centre and ensure that redevelopment of old employment locations provides replacement employment space during any intensification of use. Additionally, policies LAAP10, LAAP11 and LAAP15 also afford protection to important sources of local employment.</p>
Eco2	To encourage a vibrant, well-managed evening economy	Improved public realm	The evening economy is promoted across several sectors of the town centre by LAAP17. The redevelopments encouraged by policies LAAP3 – LAAP8 (particularly the Gateway site), supported by LAAP18 Public Realm, will provide an improved environment for an evening economy.
		Encourage a vibrant, mixed well-managed evening economy accessible to all	

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
Eco 3	To ensure the town centre is capable of adapting to changes in the economy and environment	All of the above	The policies of the AAP are focused on achieving the vision and objectives set out at the front of the AAP. They are, however, adaptable should changes in circumstances require. Policy LAAP26 details the delivery strategy for the AAP and the accompanying Appendix 3 details the delivery strategy. Within this strategy, it can be seen that there are monitors to ensure that the desired results are being achieved and for the site based policies, risks and flexible approaches are identified.
Eco3	To increase density of local business	Encourage independent mixed local business	<p>Policies LAAP 9 and 14 support the retail growth of the town centre as well as the development encouraged by the site policies of LAAP3 – LAAP8. More specifically LAAP16 defines retail areas of different types, promoting large scale retail in the central ‘primary shopping area’, while protecting other retail areas and encouraging small local businesses.</p> <p>The Core Strategy employment policies CSP3 – CSP5 apply to the town centre and ensure that redevelopment of old employment locations provides replacement employment space during any intensification of use. Additionally, policies LAAP10, LAAP11 and LAAP15 also afford protection to important sources of local employment.</p>
Eco4	To increase access to local employment and reduce local unemployment	<p>Encourage independent mixed local business</p> <p>Ensure sustainable affordable access is provided and maintained to educational facilities for people of all</p>	<p>Policies LAAP 9 and 14 support the retail growth of the town centre as well as the development encouraged by the site policies of LAAP3 – LAAP8. More specifically LAAP16 defines retail areas of different types, promoting large scale retail in the central ‘primary shopping area’, while protecting other retail areas and encouraging small local</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the AAP
			<p>businesses.</p> <p>The Core Strategy employment policies CSP3 – CSP5 apply to the town centre and ensure that redevelopment of old employment locations provides replacement employment space during any intensification of use. Additionally, policies LAAP10, LAAP11 and LAAP15 also afford protection to important sources of local employment.</p>

## 6 Implementation Monitoring

### 6.1 Links to Other Tiers of Plans and Programmes and the Project Level

This SEA/SA has been developed taking account of the aims and objectives of related plans and programmes at the international, European, national, regional and local level. The AAP provides a basis for development of appropriate design guidance and, in particular, a framework for project-specific applications and where required Environmental Impact Assessment (EIA).

#### 6.1.1 *Proposals for Monitoring*

The SEA Directive requires that *“Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action”* (Article 10.1)."

DCLG guidance on SA for DPD states that the SA Report shall include a description of the measures envisaged concerning monitoring and that proposals for monitoring must be considered early in the SA process, included in the SA Report, and reviewed in the light of any responses to consultation.

The London Borough of Lewisham needs to ensure that monitoring information is appropriate to the need of the AAP, up to date and reliable, and that sources of information are referenced. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to implementation of the AAP when they occur. However, in line with European Commission guidance, this provision may be understood as covering effects which differ from those which were predicted, or unforeseen effects which are due to changes of circumstances.

#### 6.1.2 *Monitoring Process*

The results of monitoring will be provided by the London Borough of Lewisham as part of the process of annual reporting on DPD progress. Contingency procedures will be developed to identify and address poor performance against objectives or unforeseen adverse impacts of the AAP.

Table 6-1 sets out a proposed list of monitoring activities currently being considered. The following set of SA monitoring indicators along with the AAP monitoring indicators set out have been selected in combination to monitor the performance of the AAP.

By reviewing and monitoring the Plan the Council will be able to consider:

- The impact that the Plan is having in helping to achieve national, regional and local targets;

- Whether the policies are working effectively, or require adjusting; and
- Whether any wider national or regional strategy or policy changes require a change to the Plan.

This may be revised prior to adoption of the AAP. Any changes to proposed monitoring and responsibilities that arise as a consequence of the proposed submission version and examination will be set out in the SEA Adoption Statement.



Table 6-1 Monitoring

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
<b>Social</b>						
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property Prices (£)	Borough-wide only	Land Registry	Annual
			Proportion of rented accommodation (number of renting households)	Borough-wide only	LBL	3yrs
			Number of people applying for statutory homelessness	n/a	LBL	Annual
			Number of homeless applications accepted	n/a	LBL	Annual
			Number of households in temporary accommodation	n/a	LBL	Annual
			% of affordable housing	n/a	LBL	Annual
			Increase supply of new homes	n/a	LBL	Annual
			Number and percentage of dwellings by bedroom size	n/a	LBL	Annual
			Net additional pitches (Gypsy and Traveller)	n/a	LBL	Annual
Soc2	Decent homes	To increase the provision of housing that meets decent	% of local authority houses designated as non-decent (number of dwellings)	n/a	LBL	3yrs

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		homes standards	% of new residential accommodation completed to lifetime homes standards	n/a	LBL	3yrs
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers	Numbers of the members of the public who attend council organised river activities?	n/a	LBL	Annual
			Amount of new schemes increasing access to river	n/a	LBL	Annual
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities	Funding secured through planning obligations for infrastructure, facilities, services and employment and training	n/a	LBL	Annual
Soc5	Heritage	To protect and enhance heritage buildings	Levels of investment in retaining and maintaining list buildings	n/a	LBL	Annual
			Condition of listed building in the local area	n/a	LBL	Annual
			Number of listed buildings and scheduled monuments on the 'at risk' register	n/a	LBL	Annual
			No. of conservation areas covered by up-to date CA appraisals and management plans	n/a	LBL	Annual
			No. of planning permissions granted for buildings in protected vistas, the London Panorama, and local views and panoramas	n/a	LBL	Annual

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
			Number of planning applications in buffer zones of Scheduled Ancient Monuments, Heritage Sites etc	n/a	LBL	Annual
Soc6	Culture	To protect and enhance cultural diversity	Numbers of the members of the public who attend council organised river activities?	n/a	LBL	Annual
			Gains and losses of community and recreational facilities completed	n/a	LBL	Annual
Soc7	Crime	To reduce crime levels in the town centre	Number of offences per 1000 of population  Detailed indicators for the following: - violence against person - burglaries - robberies - violent crime - sexual offences	n/a	London Metropolitan Police	Annual
Soc8	Education	To increase access to lifelong learning	Adult education provision	n/a	LBL	Annual
			% pupils receiving 5 or more GCSEs at grades A* to C equivalent	Borough wide only	LBL	Annual
			Participation of 16-18 year olds in education and training	Borough wide only	LBL	Annual

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
			Amount of apprentice schemes coordinated with local colleges	n/a	LBL	Annual
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.	% of population with access to services by walking / public transport (borough wide)	Borough wide only	LBL	Annual
			Number of shop mobility schemes	n/a	LBL	Annual
Soc10	Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population / Serious or fatal)  Detailed indicators could include: - number of road accidents with people slightly injured	Borough wide only	LBL	Annual
Soc11	Health	To improve inclusive access to local healthcare facilities	% respondents in 'good health'	Borough wide only	Census	10 year
			Life expectancy (years)	Borough wide only	NHS	Annual
			Infant mortality rates	Borough wide only	NHS	Annual
			Mortality ratio	Borough wide only	NHS	Annual
			% of people with lifelong limiting illnesses	Borough wide only	NHS	Annual

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Soc12	Noise	To reduce noise from road traffic, construction and industry	Number of complaints related to noise from: Roads, Construction, Maintenance, Noisy neighbours and Other	n/a	LBL	Annual
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces	ha of accessible open space per 1000 population	Borough wide	LBL	2010
			Gain and Loss of open space	n/a	LBL	Annual
<b>Environmental</b>						
Env1	Effects of climate change	To reduce the risk and effects of flooding	Number of people and properties affected by fluvial flood incidents.	n/a	Environment Agency	Annual
			Length of river restored and amount of restoration projects	n/a	LBL	Annual
			Amount of planning permissions granted contrary to advice of Environment Agency	n/a	LBL	Annual
			Number of approved developments which incorporate SUDS	n/a	LBL	Annual
			Number of flood prevention schemes	n/a	LBL	Annual
Env2	Sustainable transport	To reduce dependency on private cars	Proportion of people going to work by different means i.e. private car, cycle, walk, bus, train, underground etc.	n/a	Census	10 year

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
			Percentage of completed non-residential development complying with car-parking standards	n/a	LBL	Annual
			Percentage of residents surveyed using different modes of transport, reasons and distance travelled.	n/a	Census	10 year
			Number of car clubs and bays in the borough	n/a	LBL	Annual
			Number of completed car free or car limited development	n/a	LBL	Annual
			Electric car charging points	n/a	LBL	Annual
			% of permitted major developments with travel plans	n/a	LBL	Annual
			Cycle parking	n/a	LBL	Annual
Env3	Renewable energy	To increase on-site renewable energy provision	Per capita reduction in CO2 emissions	Borough wide only	LBL	Annual
			Renewable energy generation	n/a	LBL	Annual
			Provision of decentralised energy	n/a	LBL	Annual

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Env4	Energy efficiency	To increase the energy efficiency performance of existing buildings	% of new developments and refurbishments accredited to BREEAM excellent or other rating	n/a	LBL	Annual
			% CO2 energy savings from new developments	n/a	LBL	Annual
			Compliance with CSH (code for sustainable homes)	n/a	LBL	Annual
Env5	Waste and recycling	To increase the amount of waste recycling	kg of household waste per head per year	n/a	LBL	Annual
			% household waste recycled	n/a	LBL	Annual
			Number so Site Waste Management Plans submitted with planning applications	n/a	LBL	Annual
Env6	Water use	To provide sustainable sources of water	Water loss through leakages	n/a	Thames Water	Annual
			% of dwellings that have a water meter	n/a	Thames Water	
Env7	Air quality	To improve air quality	Air pollution levels of Fine Particles, Nitrogen Oxide, Carbon Monoxide, Ozone and Benzene	n/a	LBL	Annual
			Number of Local Air Quality Management Areas (LAQMA)	n/a	LBL	Annual

Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Env8	Biodiversity	To value, protect and enhance biodiversity	Achievement of Biodiversity Action Plan Targets	n/a	LBL	Annual
			Number of tree planting schemes	n/a	LBL	Annual
			Number of biodiversity enhancements schemes	n/a	LBL	Annual
			Number of completed living roofs and walls	n/a	LBL	Annual
			Number of applications within SINC granted or refused planning permission	n/a	LBL	Annual
			Change in areas and populations of biodiversity importance	n/a	LBL	Annual
<b>Economic</b>						
Eco1	Retail offer	To increase the diversity of the retail offer	Retail floorspace	n/a	LBL	Annual
			% non-retail uses in primary shopping frontages	n/a	LBL	Annual
			Number of different retail functions and types accommodated in the area	n/a	LBL	Annual
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy	Evening Economy - available floorspace	n/a	LBL	Annual



Ref	Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Eco3	Local business	To increase density of local business	Number of new businesses in the area	n/a	LBL	Annual
			Vacancy rates	n/a	LBL	Annual
			Amount of completed retail, office and leisure development	n/a	LBL	Annual
Eco4	Employment opportunities	To increase access to local employment	% of population of working age who claim unemployment benefit by age	n/a	Census	10 years
			Number of years unemployed by age?	n/a	Census	10 years
			Total amount of additional employment floorspace – by type	n/a	LBL	Annual
			Losses of employment land No net loss of B use class floor space in defined employment land areas (SIL, LEL, MEL)			

- 
- <sup>i</sup> Urban Practitioners, Sustainability Appraisal and Strategic Environmental Assessment Lewisham Town Centre further options report November 2010
- <sup>ii</sup> Lewisham Borough Council, Core Strategy June 2011
- <sup>iii</sup> European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the Strategic Environmental Assessment or ‘SEA Directive’)
- <sup>iv</sup> London Borough of Lewisham, Statement of Consultation for the Lewisham Town Centre Area Action Plan Area January 2012
- <sup>v</sup> A Practical Guide to the Strategic Environmental Assessment Directive - ODPM Sept 2005
- <sup>vi</sup> Urban Renaissance Lewisham: Health and Social Impact Assessment’ March 2004
- <sup>vii</sup> Urban Practitioners, Sustainability Appraisal Scoping Report 2010
- <sup>viii</sup> London Borough of Lewisham Sustainability Scoping Report 2005
- <sup>ix</sup> Faber Maunsell/AECOM Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Preferred Options report 2007
- <sup>x</sup> Urban Practitioners Lewisham Town Centre Area Action Plan Issues and Options Report June 2005
- <sup>xi</sup> Urban Practitioners Sustainability Appraisal Report of the Lewisham Town Centre Area Action Plan Preferred Options April 2007
- <sup>xii</sup> Urban Practitioners: Lewisham Town Centre Area Action Plan Further Options Report March 2011
- <sup>xiii</sup> London Borough of Lewisham Sustainable Community Strategy 2008-2020:
- <sup>xiv</sup> Equalities Analysis Assessment Lewisham Town Centre Area Action Plan Further Options Report June 2011

## Appendix A

The following section includes:

- Table 1 - Area Action Plan Further Options March 2011 - Policies and Area Action Plan Proposed Submission Version 2012 – Policies
- Table 2 - Area-wide policy development from Issues and Options to Preferred Option to AAP Draft Policy
- Table 3 - Preferred Options - Site-specific policy development

**Table 1 - Area Action Plan Further Options March 2011 - Policies and Area Action Plan Proposed Submission Version 2012 – Policies**

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>LTC HSG3 – CONVERSION OF EXISTING BUILDINGS</b></p> <p>The Council will encourage the conversion of existing buildings such as vacant offices or premises above shops for residential purposes provided that:</p> <ul style="list-style-type: none"> <li>(a) A satisfactory living environment can be provided;</li> <li>(b) There is no conflict with existing land uses; and</li> <li>(c) The proposal complies with policy LTC EMP1.</li> </ul>	<p><b>LAAP 12 Conversion of Existing Buildings</b></p>	<p>No new information – No further SA required</p>
<p><b>LTC SH2 – VITALITY AND VIABILITY</b></p> <p>Development should sustain and enhance the vitality and viability of the town centre in the context of the strategic development of Lewisham Gateway. To ensure this, the Council will encourage the following:</p> <ul style="list-style-type: none"> <li>a. Implementation of Lewisham Gateway proposals (see Core Strategy Strategic Site Allocations Policy 6);</li> <li>b. Public realm enhancements (see LTC URB6);</li> <li>c. Retail and mixed use allocations on key development sites (LTC URB4);</li> <li>d. A greater mix of uses including cafés, bars and</li> </ul>	<p><b>Policy LAAP9: Growing the local economy</b> <b>And</b> <b>LAAP 14 Town Centre Vitality And Viability</b></p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>other evening economy uses to support vitality of retail offer (see LTC SH8);</p> <p>e. Incorporation of design principles such as a mix of uses, active frontages and effective street lighting with a view to making the town centre a safer place (see LTC URB4, LTC URB5 and LTC URB6);</p> <p>f. Shopfront improvements and funding programmes (see shopfront Supplementary Planning Document);</p> <p>g. A greater component of residential development within the town centre within the overall mix of uses (see Core Strategy and London Plan targets);</p> <p>h. Provision of community and leisure facilities (see LTC COM1 and LTC COM2);</p> <p>i. Retention and/or re-provision of employment and office uses in the town centre (see LTC EMP1 and LTC EMP 2); and</p> <p>j. Creation of a secondary focus of activity at the southern end of the pedestrianised High Street, incorporating a mix of uses to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development</p>		
<p><b>LTC SH3 – LEWISHAM MARKET</b> [Retained with amendment]</p> <p>The Council will continue to promote Lewisham Market as an essential part of the retail centre and encourage ancillary facilities in order to maintain its viability. The Council will investigate, in consultation with market traders, retailers and other town centre stakeholders, ways in which the Market can be improved including temporary use of the Market space for alternative activities (e.g. street food stalls or informal leisure activities) in the evenings and other times when the Market is not in use).</p>	<p><b>Policy LAAP 15 – Lewisham Market</b></p>	<p>No new information – No further SA Required</p>
<p><b>LTC SH5 – PRIMARY SHOPPING AREAS</b></p>	<p><b>Policy LAAP- 16 Retail Areas</b></p>	<p>No new information – No further</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>Within the Primary Shopping Areas, as defined on Figure 4, the Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions:</p> <p>(a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1uses and 70% maintained in A1 use);</p> <p>(b) Whether the proposal will generate a significant number of pedestrian visits; and</p> <p>(c) Whether the proposal uses vacant units (having regard both to their number within the centre as a whole and the Core Area and the length of time they have been vacant). All proposals for non retail development within Core Areas, including where relevant changes of use, should:</p> <p>(d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and</p> <p>(e) Where appropriate, provide attractive display windows and entrances that are compatible with adjoining shop units.</p>		<p>SA Required</p>
<p><b>LTC SH6 – SECONDARY SHOPPING AREAS</b> [Retained with amendment]</p> <p>Within the Secondary Shopping Areas, as defined on Figure 4, proposals for development or change of use from an A1 shop will generally be acceptable provided:</p> <p>(a) It is to another A use class, community use or amusement centre where such a change does not result in an over-concentration of non A1 uses</p>	<p><b>Policy LAAP 16 Retail Areas</b></p>	<p>No new information – No further SA Required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>(normally 3 non A1 uses);</p> <p>(b) It does not harm the amenity of adjoining properties;</p> <p>(c) It does not harm the retail character (with reference to Policy LTC SH7), attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units; and</p> <p>(d) It is considered appropriate in relation to the area"s specific retail character.</p>		
<p><b>LTC SH7 – Retail Character Areas</b></p> <p>The town centre benefits from areas of discrete retail character which, individually and collectively contribute positively to the vitality and viability of the centre. There are also areas where major retail led developments are anticipated and the retail character that they create will be an important consideration.</p> <p>Development proposals should take account of, not compromise and seek to complement existing and anticipated retail character of specific parts of the town centre as follows:</p> <p><b>1. Lewisham Gateway</b></p> <p>The retail character that should be aspired to in this area is a mixture of retail and leisure uses. Creation of an open space at the confluence of rivers provides opportunity for cafes, bars and similar uses.</p> <p><b>2. Lee High Road</b></p> <p>The western end of Lee High Road is a mixed use traditional high street with retail (A1 &amp; A3) at ground floor and flatted accommodation above. Retailing on Lee High Road has a strong independent character and frontages are relatively short. There are already high concentrations of take-away and other non-retail uses and care will need to be taken to ensure over</p>	<p><b>Policy LAAP 16 Retail Areas</b></p>	<p>No new information – No further SA Required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>concentrations are not established.</p> <p><b>3. Loampit Vale North</b></p> <p>The retail character that should be aspired to at this „edge of centre“ location is for large retail units, with parking, to support primary shopping.</p> <p><b>4. Ladywell Road</b></p> <p>Ladywell is a mixed area with a good range of secondary retailing providing everyday servicing needs of the local area. Most commercial premises have shopfronts of traditional character. Ladywell Road is more residential in character, with several community uses and a limited number of commercial uses.</p>		
<p><b>LTC SH8 – Criteria For Evening Economy Uses</b> [Retained with amendment]</p> <p>Overall approach: The Council will encourage proposals for new uses that would positively contribute to the evening economy of the town centre where the following criteria are met:</p> <p>(a) The retail character of the area is not harmed (with reference to LTC SH7), and in particular the retail character of the primary shopping area;</p> <p>(b) The proposal would contribute positively to the character of the particular area, as outlined in the LTC SH7; and</p> <p>(c) The cumulative impact of the proposal does not unreasonably harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours. Suitable town centre locations: It is considered that the following areas would be suitable locations for evening</p>	<p><b>Policy LAAP 17 - LTC SH8 – Criteria For Evening Economy Uses</b></p>	<p>No new information – No further SA Required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>economy uses, as part of a wider mix of uses:</p> <ul style="list-style-type: none"> <li>(a) Lewisham Gateway</li> <li>(b) Lewisham High Street between Limes Grove and Morley Road</li> <li>(c) Ladywell</li> <li>(d) Lee High Road</li> </ul>		
<p><b>LTC URB4 – Mixed Use</b>  [Retained without amendment]</p> <p>An appropriate mix of compatible land uses will be encouraged both vertically and horizontally in Lewisham Town Centre. In particular, high density residential development above ground floor retail and commercial uses will be encouraged.</p> <p>Wherever possible, new development should be designed to accommodate active uses at ground floor level, with significant amount of window display and entrances.</p>	<p><b>Policy LAAP 10 – Mixed Use</b></p>	<p>No new information – No further SA Required</p>
<p><b>LTC URB5 - Urban Enclosure, Grain</b></p> <p>Urban enclosure and urban grain play a critical role in creating good quality environments and the following principles should be considered in any proposals for development:</p> <ul style="list-style-type: none"> <li>(a) Public spaces should be strongly defined by the built edges that surround them and groups of building should be designed to form unified urban 'backdrops'.</li> <li>(b) Existing street patterns should be respected and where possible extended in areas of new development. Single-use and overly long blocks should be avoided.</li> <li>(c) Buildings should front public spaces, and on major streets and public spaces backs" of properties should be avoided wherever possible.</li> </ul>	<p><b>Combined with Policy LAAP18: Public Realm</b></p>	<p>No new information – this has been incorporated in LAAP18: Public Realm – No further SA Required</p>



AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>LTC URB6 - PUBLIC REALM</b></p> <p>Public spaces in Lewisham should be designed to be attractive, safe and robust through consideration of the following factors:</p> <p>(a) Unnecessary street clutter should be avoided, and where it is useful and functional, street furniture and lighting should be designed to delight.</p> <p>(b) The provision of public art in association with all major development in the town centre will be encouraged and should be considered at the early stages of the design process.</p> <p>(c) Development should enhance community safety through the overlooking of entrances and exits and clear definition of public and private space. Developers should show how they have taken „Secure by Design" into account with a view to designing out crime".</p> <p>(d) New development and public space improvements should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes. Enhancements to connections between the town centre and surrounding residential communities are particularly important.</p> <p>(e) The Council will promote opportunities to make innovative use of existing and additional public realm areas as publicly accessible open space that can be used for recreation purposes and events and footways and civic spaces need to be generously sized, designed and managed accordingly.</p> <p>(f) Development should ensure that the public realm and development projects incorporate inclusive design principles. The Council will also seek to make</p>	<p><b>Policy LAAP18: Public Realm</b></p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
provision for shopmobility initiatives.		
<p><b>LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS</b> [New policy]</p> <p>The Council will seek to protect and enhance the environs of the River Quaggy and the River Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the deculverting of rivers and programmes of naturalisation of riparian environments. Proposals should also respond positively to waterway heritage. The Council will seek to safeguard Waterlink Way and the East London Green Grid network, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency and the GLA.</p> <p>The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park.</p>	<p>This policy has been removed from the AAP Pre-Submission Version. It is repetitious of the Core Strategy on the most part. Site specific issues and opportunities have been added to the Town Centre Area and site policies.</p>	<p>N/A</p>
<p><b>LTC EMP1 – Employment Uses in Lewisham Town Centre</b> Molesworth Street will be protected as an</p>	<p><b>LAAP 11: Employment Uses In Lewisham Town Centre</b></p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>employment site in line with the site"s designation as a Local Employment Location in Core Strategy Policy 2.</p> <p>In general, the Council will seek to retain or re-provide existing employment uses in the town centre (uses falling within the category of Use Class B).</p> <p>In recognition of the opportunity to enhance vitality and viability of the town centre, the Council will consider redevelopment or conversion of other employment sites/buildings for a mix of uses. It is envisaged that redevelopment proposals will enable the intensification of sites and as such there is an opportunity to re-provide employment floorspace as part of a wider mix of uses, including residential.</p> <p>Employment sites which will be considered for redevelopment include the following:</p> <ul style="list-style-type: none"> <li>(a) Former Beatties building (offices over ground floor retail);</li> <li>(b) Engate Street;</li> <li>(c) Thurston Road and Jerrard Street;</li> <li>(d) Conington Road; and</li> <li>(e) Citibank Tower.</li> </ul> <p>The conversion of other existing employment sites to a mix of uses including residential may be considered acceptable where:</p> <ul style="list-style-type: none"> <li>(a) The building has been vacant for at least 2 years and appropriately marketed for that length of time, and evidence is provided to this effect; and</li> <li>(b) The scheme will considerably assist in meeting other regeneration objectives such as:</li> </ul> <p>Improvement to the vitality and viability of the town centre;</p> <p>Meeting the Borough"s housing priority needs; and/or</p>		

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>The provision of community and leisure facilities within an accessible and socially inclusive location. (c) The design is capable of longer term adaptation</p>		
<p><b>LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE</b> [Retained with amendment] Lewisham Town Centre is the preferred location for large scale office development in the Borough and the Council will seek to promote new office development where appropriate. The Council will resist the loss of office space in the town centre with reference to the criteria identified in LTC EMP1. Where redevelopment entails the loss of office uses, proposals will be encouraged to re-provide this office space in a modern format.</p>	<p><b>LAAP 11: Employment Use.</b> Hotel Use is a new element at the Pre-Submission stage policy.</p>	<p>Further SA required for the new element</p>
<p><b>LTC TRS2 – Existing Public / Shopper Parking Spaces In The Town Centre</b> [Retained with amendment] The Council will seek to retain the quantum of existing public /shopper parking spaces in the town centre as a minimum level. The Council will, where possible, also seek to broadly maintain the existing ratio of parking spaces to retail floorspace through a moderate increase in provision in line with an expansion in retail floorspace. The development of the following opportunity areas and sites are expected to involve a significant amount of new retail floorspace and all existing and any new associated parking spaces should be publicly accessible. (a) Hartwell Ford site (b) Conington Road Opportunity Area (c) Loampit Vale Opportunity Area (d) Ladywell Leisure Centre</p>	<p><b>LAAP 20 - Existing Public / Shopper Parking Spaces</b></p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>LTC TRS3 – Cycling and Walking Routes</b> [Retained without amendment]</p> <p>Opportunities should be maximised to enhance routes such as Waterlink Way, and to connect other parts of the town centre into the wider cycling and pedestrian network that links with surrounding areas should be maximised.</p>	<p><b>Policy LAAP21 – Sustainable transport</b></p>	<p>No new information – No further SA required</p>
<p><b>LTC TRS4 – Mitigating Against the Impact of Roads and Roundabouts</b> [Retained with amendment]</p> <p>The Council will support measures to improve the visual, and pedestrian and cyclist experience of the town centre, including at the following locations:</p> <ul style="list-style-type: none"> <li>(a) Northern roundabout;</li> <li>(b) Loampit Vale;</li> <li>(c) Lee High Road and Belmont Hill;</li> <li>(d) Lewisham High Street;</li> <li>(e) Molesworth Street;</li> <li>(f) Southern roundabout; and</li> <li>(g) The junctions at Ladywell Road / Lewisham High Street / Courthill Road.</li> </ul>	<p><b>Policy LAAP21 – Sustainable transport</b></p>	<p>No new information – No further SA required</p>
<p><b>LTC COM3 – Range of Community, Leisure And Entertainment Spaces</b></p> <p>In order to contribute to town centre vitality, the Council is supportive of the provision of a flexible community spaces along with a range of leisure and entertainment uses in Lewisham Town Centre. In particular, the Council will be supportive of proposals for a cinema in the town centre, and a site at the northern end of the centre, such as the Lewisham Gateway site, is considered to be an appropriate location.</p>	<p><b>Policy LAAP22: Social Infrastructure</b> LTC COM3 has been included in LAAP22 Social Infrastructure in the Pre-Submission Version.</p> <p>The part highlighted in bold and italics has been added to the policy LAAP22, while the other parts have just been added to the supporting text of the policy.</p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>The AAP is proactive in identifying opportunities for additional community and leisure facilities as follows:  Refurbishment of the Playtower building on Ladywell Road into a multi-use community asset  Potential for further enhancement of the Leemore Resource Centre on Lee High Road.</p> <p>The Loampit Vale Leisure Centre will provide a significant improvement in the provision of indoor sports and leisure facilities in the town centre, enabling the development of the Ladywell Leisure Centre site for other uses. <b><i>The redevelopment of other existing community, leisure and entertainment spaces for alternative uses will only be permitted if it can be demonstrated that:</i></b></p> <p><b><i>(a) the facility is no longer needed or an equivalent facility can be replaced at an alternative site with an equal or improved level of accessibility;</i></b></p> <p><b><i>(b) the locational requirements for the facility are not met;</i></b></p> <p><b><i>(c) the facilities need updating which cannot be achieved at a reasonable cost;</i></b></p> <p><b><i>and/or</i></b></p> <p><b><i>(d) alternative provision of equivalent benefit to the community is made.</i></b></p> <p>Opportunities also need to be maximised for the provision of enhanced/additional leisure and sports facilities in and around the town centre.</p>		
<p><b>LTC IMP1 – Monitoring</b></p> <p>The Council will facilitate the monitoring of the AAP through the monitoring framework and the following interventions:</p> <p>(a) Adherence to PPS4 recommendations for town</p>	LAAP27 Monitoring	No new information – No further SA required

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>centre healthcheck monitoring;</p> <p>(b) Monitoring progress on planning applications;</p> <p>(c) Reporting progress on infrastructure delivery to the Asset Management Board and Sustainable Development Partnership; and.</p> <p>(d) The inclusion of a town centre specific section in the Annual Monitoring Report (AMR)</p> <p>The full monitoring framework including indicators, targets, trends and indicator sources, can be viewed in Appendix 4.</p>		
<p><b>Energy</b></p> <p><b>Carbon Dioxide Emission Reduction in Lewisham Town Centre</b></p> <p>All proposed development will be expected to minimise energy consumption through the adoption of sustainable design and construction methods.</p> <p>Prospective developers are encouraged to liaise with the Local Planning Authority at the pre-application stage when considering potential site-specific energy strategies. Planning applications for „major development“ are expected to be supported by a Sustainability Statement and Energy Statement (in accordance with Core Strategy Policy 8) which, amongst other things, provides a comprehensive assessment of the nature of heat and electrical loading to inform the approach. The following methods should be considered as part of potential energy strategies:</p> <p>PV technologies to offset electrical load.</p> <p>Gas-fired CHP and solar thermal to offset heat load (together with electricity in the case of CHP).</p> <p>CHP option, which can be implemented at either a building or a community scale.</p>	<p>LAAP24 - <b>Carbon Dioxide Emission Reduction</b></p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>All „major development“ will be expected to incorporate communal heating which future-proofs the development and allows for larger scale decentralised energy clusters to be developed in the medium to long term, in some cases beyond the plan period. Where it has been demonstrated that a communal heating system would not be the most suitable option in the short to medium term, the development should ensure a connection can still be facilitated in the medium to long term. In doing so developments should:</p> <p>Incorporate energy centres that are appropriately sized not only to accommodate the interim requirements of CHP/other centralised plant, but to accommodate a „consumer substation unit“ – to provide all the necessary equipment for a connection to a heating network and for domestic hot water preparation;</p> <p>Where a communal heating system is not installed, incorporate pipework to the edge of the site, ensuring the likely shortest distance to future networks;</p> <p>Locate energy centres close to a street frontage (but without creating „dead frontage“ to a street), ensuring the likely shortest distance to future networks;</p> <p>and</p> <p>Safeguard routes from site boundaries to energy centres to enable a connection to be made to a network in the future.</p> <p>The Council will actively pursue options for decentralised energy by, amongst other things:</p> <p>Monitoring opportunities and managing and co-ordinating development proposals;</p> <p>Working with public and private sector stakeholders;</p> <p>Facilitating further detailed assessment of logistical</p>		



AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>and technical issues such as potential energy centre locations, connecting pipework routes and operator issues for sites/clusters that have potential; and Working with Transport for London and utility companies, seek to facilitate potential pipework routes when undertaking any major highway works.</p>		
<p><b>NEW POLICY 2 – Social Infrastructure</b> The Council working with public, voluntary, community and private sector partners will ensure that social infrastructure provision in and around the Town Centre is sufficient to support the growth promoted by the AAP and that it is delivered in a timely manor that keeps pace with the delivery of additional homes.</p>	<p><b>Policy LAAP22: Social Infrastructure</b> The social infrastructure element of the Pre-Submission Version policy has been re-written to make it more thorough and understandable; this does not change the essence of the policy.</p>	<p>No new information – No further SA required</p>
<p><b>Implementation strategy</b> The Council will implement the AAP by working with public, voluntary, community and private sector partners and co-ordinating action, including:</p> <ul style="list-style-type: none"> <li>(a) Allocating sites for particular uses;</li> <li>(b) Engaging in pre-application discussions with prospective developers;</li> <li>(c) Using the Lewisham Design Panel to help secure high quality design;</li> <li>(d) Requiring planning applications to address the AAP's vision, objectives and policies;</li> <li>(e) Developing and selling its own land;</li> <li>(f) Where appropriate using its compulsory purchase powers;</li> <li>(g) Implementing the Infrastructure Delivery Plan, Local Implementation Plan and Borough Investment Plan;</li> <li>(h) Partnership working; and</li> </ul>	<p>Policy LAAP26: Implementation</p>	<p>No new information – No further SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
(i) Planning Obligations/Community Infrastructure Levy.		
<b>N/A</b>	<b>Policy LAAP19: Student Housing</b>	New Policy SA Required
<b>N/A</b>	<b>Policy LAAP19: Tall Buildings</b>	New Policy SA Required
<b>N/A</b>	<b>Policy LAAP23: Heritage assets</b>	New Policy SA Required
<b>N/A</b>	<b>Policy LAAP25: Adapting to climate change</b>	New Policy SA Required
Sub-Area Specific Policies		
<p><b>SITE SPECIFIC POLICY 1.1: Kings Hall Mews</b>  This site occupies an important location adjacent to the Lewisham Gateway site.  Acceptable uses include Retail (A1 to A3), Business (B1) and a hotel (C1) and proposals will be expected to adhere to the following principles</p> <p>1 Any proposals should be of the highest design quality and relate carefully to both the four storey Victorian terrace on Granville Grove, the St. Stephen"s conservation area and proposals for the Lewisham Gateway site and provide active ground floor frontages to Kings Hall Mews and Lewisham High Street;</p> <p>2 In the context of principle 1, proposals must be justified by a clearly articulated rationale for the proposed use(s), height, scale and massing; and</p> <p>3 Proposals must conform to the highest quality design principles, in particular to overcome the site and environmental constraints</p>	<b>Policy LAAP3: S2 Kings Hall Mews, Lewisham Gateway</b>	The order and the wording of the policy have been amended only. No new information – No further SA required
<p><b>CHARACTER AREA POLICY 2: Loampit Vale character area</b>  The Loampit Vale character area provides the western gateway to the town centre.</p>	<p><b>Policy LAAP4: Loampit Vale Town Centre Area</b>  Major new mixed use development is required in this area to complement the Lewisham Gateway Town Centre Area, as</p>	<p>New Elements – further SA Appraisal required  Policy LAAP4 parts 1, 2 and 5 are taken from the previous character</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>The area has considerable capacity for urban growth and radical improvements in townscape quality. The Loampit Vale character area has the following indicative capacity:</p> <ul style="list-style-type: none"> <li>o 1,650 homes; and</li> <li>o 13,100 sqm net retail.</li> </ul> <p>New development should be coordinated to transform Loampit Vale into a wide, tree-lined urban boulevard. Key priorities for the area are as follows:</p> <p>1 Radical improvement to the quality of the public realm in the area including pedestrian and cycle routes, facilitated by major new developments coming forward within the character area;</p> <p>2 Major new mixed use development providing:</p> <ul style="list-style-type: none"> <li>(a) residential units across a range of dwelling types and sizes in this highly sustainable location; and</li> <li>(b) retail floor space appropriate to this location that complements rather than competes with the core town centre retail offer.</li> </ul> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <ul style="list-style-type: none"> <li>a. Public realm improvements including Loampit Vale and Jerrard Street pavement widening and tree planting;</li> <li>b. Public transport improvements;</li> <li>c. Public access to any non-residential car parking;</li> <li>d. Communal heating; and</li> <li>e. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities).</li> </ul>	<p>follows:</p> <ol style="list-style-type: none"> <li>1. Ground floor and possibly first floor uses will be retail, business and community spaces which complement rather than compete with existing town centre uses. The retail character of this area is 'edge of centre' and suits large units with parking.</li> <li>2. Further storeys will provide residential units across a range of dwelling types and sizes in this highly sustainable location.</li> </ol> <p>Further, the following priorities are expected to be delivered by all developments:</p> <ol style="list-style-type: none"> <li>3. Ground floors must provide active frontage and strong built edges proportionate to the town centre location, especially facing Loampit Vale.</li> <li>4. <b><i>Buildings must be of an appropriate scale and 'lead up' to Lewisham Gateway, while taking account of local environmental and micro-climatic impacts.</i></b></li> <li>5. Facilitation of radical improvement to the quality of the public realm in the area, through the provision of pedestrian and cycle route improvements, generous tree lined pavements (6-8m width) to create boulevards and coordinated material treatment. Key routes include, Loampit Vale, Thurston Road, Jerrard Street and north-south routes that link to the wider hinterland.</li> <li>6. The site is situated within Flood Zone 3a High Probability. Developers will be expected to provide an FRA and work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</li> </ol>	<p>area policy.</p> <p>Part 3 and part 6 featured in the previous site specific policies 2.1, 2.2 and 2.3. They have been combined into one Town Centre Area policy, but are not new to the document as policies.</p> <p>Part 4 was included in the previous version as parts 1 and 3 of the site specific policy 2.2. As this has been moved to a Town Centre Wide policy, it is technically new, as it covers a wider area now.</p>
<p><b>SITE SPECIFIC POLICY 2.1: Loampit Vale North –</b></p>	<p><b>Additional site specific requirements:</b></p>	<p>No new information – No further</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>east of Jerrard Street</b></p> <p>The land east of Jerrard Street is allocated for mixed use development that will complement the mixed use development of other sites in this Character area and in the Gateway character area.</p> <p>The Council will require a comprehensive masterplan which is endorsed by landowners for the land east of Jerrard Street and its surrounds that delivers the following principles:</p> <ol style="list-style-type: none"> <li>1 Creation of a strong defined built edge to Loampit Vale with new development providing activities and interest at the ground floor;</li> <li>2 Creation of generous tree lined pavements with a coordinated approach to public realm material treatment (width of 6-8m);</li> <li>3 Taller elements of new development should address Loampit Vale;</li> <li>4 Improvement of north-south routes across the site and under the railway lines that link to the wider hinterland;</li> </ol> <p>Enhance accessibility to Lewisham Station where possible;</p> <p>Dedicated bus lane for turning from Loampit Vale into Jerrard Street which may require building lines to be set back to facilitate the necessary depth of pavement;</p> <p>7 Jerrard Street and Thurston Road will take on more importance as new low car-parking schemes encourage walking and cycling and the quality and width of the footways require improvement; and</p> <p>8 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are</p>	<p><b>S1 Loampit Vale north–east of Jerrard St</b></p> <p><b>S2 Loampit Vale north–wst of Jerrard St</b></p>	<p>SA Required</p> <p>SA required</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
incorporated.		
<p><b>SITE SPECIFIC POLICY 2.2: Loampit Vale North – west of Jerrard Street</b></p> <p>[Amended version of preferred option draft policy LTC OPP4e]</p> <p>The Thurston Industrial Estate is allocated for mixed use town centre development.</p> <p>The Council will encourage development of this prominent and important site.</p> <p>Proposals should incorporate the following principles:</p> <p>1 Create an active building frontage to Loampit Vale and Jerrard Street of a scale appropriate to this town centre location. New development should prepare the visitor for the scale of the development they will encounter in the Lewisham Gateway to the west;</p> <p>2 Ground and possibly first floor uses should ideally be retail, business and community spaces with flatted accommodation above, taking account of the southerly aspect available and the amenity provided by the new publicly accessible open space being created to the south of Loampit Vale;</p> <p>3 The use and design of any new building needs to take account of the impact of shadows cast from buildings on the south side of Loampit Vale on this site and the microclimatic impact of any proposals on Thurston Road;</p> <p>4 Support the improvement of the public realm adjoining the railway line and facing the Thurston Road Industrial Estate, in order to enhance amenity for residents on surrounding development sites;</p> <p>5 Enhancement of public realm on Thurston Road;</p> <p>6 Creation of generous tree lined pavements with a coordinated approach to public realm material</p>		

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>treatment (width of 6-8m);</p> <p>7 Jerrard Street and Thurston Road will take on more importance as new low car-parking schemes encourage walking and cycling and the quality and width of the footways require improvement; and</p> <p>8 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p>		
<p><b>POLICY 2.3: Railway strip</b></p> <p>The railway strip site is allocated for a commercial-led mix of uses.</p> <p>All proposals should incorporate the following principles:</p> <p>1 Proposals for the land north of the existing Thurston Road Industrial Estate should relate to the geographic constraints presented by the narrow plot depth and location adjacent to the Victorian railway viaduct. This land is considered appropriate for commercial or mixed uses.</p> <p>2 Proposals for the land parcels to the west, leading to the Brookmill Road do not contribute positively to townscape quality. The plots in this location are deeper and therefore have greater potential for a mix of uses. Flatted residential accommodation might be appropriate if the environmental issues associated with this location are satisfactorily mitigated.</p> <p>3 Any proposals should seek to enhance the quality of the pedestrian environment to enhance the arrival experience for pedestrians travelling to and from the town centre from the northwest. This highlights the need for active, non-residential uses at groundfloor.</p> <p>4 The site is situated within Flood Zone 3a High</p>		

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p> <p>5 Any proposal or residential development on the site must overcome any environmental issues and the constraints of the site to provide a high quality of accommodation and amenity</p>		
<p><b>CHARACTER AREA POLICY 3: Conington Road character area</b></p> <p>The Conington Road character area provides the opportunity for the establishment of a new and compact town centre neighbourhood with improved links to the station interchange, Lewisham Gateway and the core town centre beyond. The area has considerable capacity for urban growth and radical improvements in townscape quality together with an expanded Tesco store.</p> <p>Development opportunities in the Conington Road area have the following indicative capacity:</p> <ul style="list-style-type: none"> <li>• 400 homes; and</li> <li>• 3,000 sqm net retail.</li> </ul> <p>New development should address the key routes of Conington Road, Silk Mills Path and the River Ravensbourne. Key priorities for the area are as follows:</p> <p>1 To improve and create accessible pedestrian and cycle routes across the area to the Gateway site, Lewisham Station and the River Ravensbourne.</p> <p>2 To enhance the ecological quality of river environment and ensure the river corridor is also improved to form a valuable public amenity, potentially as a riverside walk.</p> <p>3 To support appropriate expansion of the Tesco</p>	<p><b>Policy LAAP5: Conington Road Town Centre Area</b></p>	<p>No new information – No further SA required.</p> <p>The other parts of the policy have been taken from the previous Character Area Policy 3.</p> <p>The section below has been removed from the policy and has been added to the supporting text:</p> <p>The Conington Road character area provides the opportunity for the establishment of a new and compact town centre neighbourhood with improved links to the station interchange, Lewisham Gateway and the core town centre beyond. The area has considerable capacity for urban growth and radical improvements in townscape quality together with an expanded Tesco store.</p> <p>Development opportunities in the Conington Road area have the following indicative capacity:</p> <ul style="list-style-type: none"> <li>• 400 homes; and</li> </ul>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>store for additional convenience retail floorspace, so long as it does not prejudice the wider objectives for the Character Area as a whole.</p> <p>4 To ensure the most sustainable use is made of the land available to support the further establishment of a new high quality residential neighbourhood in this sustainable location.</p> <p>5 The scale and grain of existing historic fabric at the southern end of this area, its mix of uses and townscape character, are important assets of the town and should be retained and enhanced.</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <ul style="list-style-type: none"> <li>a. Public realm improvements</li> <li>b. Naturalisation and improvements to the ecological quality of the river</li> <li>c. Provision of the publicly accessible pedestrian and cycle routes</li> <li>d. Improved access to Lewisham Station.</li> <li>e. Public access to non-residential car parking</li> <li>f. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)</li> </ul>		<ul style="list-style-type: none"> <li>• 3,000 sqm net retail.</li> </ul> <p>And</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <ul style="list-style-type: none"> <li>a. Public realm improvements</li> <li>b. Naturalisation and improvements to the ecological quality of the river</li> <li>c. Provision of the publicly accessible pedestrian and cycle routes</li> <li>d. Improved access to Lewisham Station.</li> <li>e. Public access to non-residential car parking</li> <li>f. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)</li> </ul>
<p><b>SPECIFIC POLICY 3.1: Tesco block and car park land</b></p> <p>The Tesco site and its car parks are allocated for mixed use development including an overall increase in the amount of convenience floorspace in line with identified capacity.</p> <p>1 Access to the river, both visual and physical, from Conington Road should be improved.</p>	<p><b>Additional site specific requirements:</b></p> <p><b>S6 Tesco block, car park and petrol station</b></p> <p>Development involving some retail expansion, residential development and other uses such as a hotel on this site will be satisfactory providing it will respond to the following principles:</p> <ul style="list-style-type: none"> <li>a) Any proposals must be accompanied by a masterplan demonstrating the wider approach across the TCA and</li> </ul>	<p>Further SA Appraisal required of whole policy.</p>



AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>2 Establishment of a new direct and publicly accessible pedestrian and cycle route linking Lewisham Road to the existing footbridge across the river, enabling new links to Lewisham Station and Gateway site.</p> <p>3 Redevelopment/refurbishment of this site provides a valuable opportunity to improve the quality of frontages to Lewisham Road and the southern end of Silk Mills Path, which are currently poorly addressed by the existing development.</p> <p>4 Parking could be provided beneath a redeveloped car park site, utilising the change in levels across the site. A multi storey parking structure on the island site adjacent to the railway line may help release other surface car park sites and ensure new parking spaces are closer to the store and may be acceptable if of outstanding design and does not prejudice the creation of a secondary access to Lewisham Station.</p> <p>5 Significant residential development could be accommodated on the existing surface car park site either side of and directly addressing Silk Mills Path and Conington Road.</p> <p>6 The location of the existing Petrol Filling Station constrains the extent to which this highly accessible site can be transformed into a genuine urban mixed use quarter. The disparate urban form and highly trafficked nature of the filling station does not match the objective of enhancing the Silk Mills Path connection. In this context, the Council will seek to work closely with the developer to mitigate the impact of any filling station, ideally through its relocation off-site.</p> <p>7 Proposals should seek to maintain the security and privacy of the existing properties south of Silk Mills Path.</p>	<p>how proposals link in with the town centre, including Lewisham Gateway, and Lewisham Station and must facilitate the delivery of a mixed use development appropriate to this town centre location.</p> <p>b) Taller elements should be avoided next to the existing historic fabric and the river. However, development may take advantage of the natural slope of the site to influence building heights and to incorporate underground car parking.</p> <p>c) The quality of frontages to Lewisham Road and Silk Mills Path should be improved, including opportunities to enhance the southern portion of Silk Mills Path and to activate the frontage onto the River both physically and visually.</p> <p>d) New buildings should provide high quality urban space with generous, functional and formal landscaped areas forming the central part of an improved Silk Mills Path and river corridor.</p> <p>e) Underground or ground floor parking should be masked by development which provides activity to public routes around the block</p> <p>f) Any redevelopment involving the retention of the existing store should seek to enhance the existing building.</p> <p>g) Proposals should seek to maintain the security and privacy of the existing properties south of Silk Mills Path.</p>	

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>CHARACTER AREA POLICY 4: Lee High Road character area</b></p> <p>Development opportunities in the Lee High Road Character area have the following indicative capacity:</p> <ul style="list-style-type: none"> <li>• 110 homes; and</li> <li>• 2,000sqm net retail</li> </ul> <p>The Council has identified the following key principles for sites within the Lee High Road character area:</p> <p>1 Protect and enhance the traditional high street character of Lee High Road;</p> <p>2 Protect and enhance the biodiversity along the River Quaggy and its immediate environment and, where possible, improve visual and physical access to the river corridor in consultation with the Environment Agency and other relevant stakeholders; Protect and enhance amenities of existing residents from and through new development; and</p> <p>4 Improve the environmental quality of the area, In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <p>a. Improvements to the channel and environs of the River Quaggy;</p> <p>b. Environmental improvements to Albion Road car park; and</p> <p>c. Physical/public realm Improvements to Lee High Road.</p>	<p><b>Policy LAAP6: Lee High Road Town Centre Area</b></p> <p>The Council will encourage development that contributes to the realisation of the following principles:</p> <ol style="list-style-type: none"> <li>1. Protect and enhance the retail character of the area, particularly the focus on small scale, independent retailers and evening economy uses.</li> <li>2 Protect and enhance the amenities of existing residents and through new development.</li> <li>3 The scale of new development should respect the scale of surrounding development.</li> </ol> <p>Further focus should be on improving the environmental quality of the area, particularly through:</p> <p>Ensuring the high quality design of new and replacement shopfronts.</p> <p>Enhancing the public realm in general and particularly reinforcing the positive relationship between the small stretches of cobbled street on the northern side of Lee High Road, including the western end of Marischal Road, to the busier Lee High Road.</p> <p>Protect and enhance the biodiversity along the River Quaggy and its immediate environment and, where possible, improve visual and physical access to the river corridor in consultation with the Environment Agency and other relevant stakeholders.</p> <p>The site The site is situated within Flood Zone 3a High Probability. Developers will be expected to provide an FRA and work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p>	<p>No further SA Appraisal required Character Area Policy 4 and Site Specific Policy 4.1 were combined to create LAAP6 in the new Pre-Submission Version.</p> <p>All of the parts of LAAP6 can be sourced back to either the previous site or area policies (4 or 4.1).</p> <p>The following text has been removed from the policy and added to the supporting text:</p> <p>Development opportunities in the Lee High Road Character area have the following indicative capacity:</p> <ul style="list-style-type: none"> <li>• 110 homes; and</li> <li>• 2,000sqm net retail</li> </ul> <p>And</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <p>a. Improvements to the channel and environs of the River Quaggy;</p> <p>b. Environmental improvements to Albion Road car park; and</p> <p>c. Physical/public realm Improvements to Lee High Road.</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>SITE SPECIFIC POLICY 4.1: Lee High Road western end</b></p> <p>The Council will encourage development to contribute to the realisation of the following principles:</p> <p>1 Protect and enhance the retail character of the area with respect to its focus for small independent retailers and evening economy uses;</p> <p>2 Improve pedestrian and retail environment by pavement widening, improving formal crossing opportunities, tree planting and opening up better links to the River Quaggy;</p> <p>3 Provide a high design quality to new and replacement shopfronts;</p> <p>Redevelopment of the single storey shops to include small retail or food and drink units on the ground floor and residential or office uses above taking advantage where possible of opportunities to provide glimpse views of the river channel;</p> <p>5 Heights of new development should respect and reflect the heights of surrounding development; and</p> <p>6 Reinforce the positive relationship between the small stretches of cobbled street on the northern side of Lee High Road, including the western end of Marischal Road, to the busier Lee High Road.</p> <p>7 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p>	<p><b>Policy LAAP6: Lee High Road Town Centre Area</b></p>	<p>Combined with above policy. No further SA Required</p>
<p><b>CHARACTER AREA POLICY 5: Ladywell Road character area</b></p> <p>Development opportunities in the Ladywell Road Character area have the following indicative capacity:</p>	<p><b>Policy LAAP7: Ladywell Town Centre Area</b></p> <p>All developments in the Ladywell Town Centre Area should adhere to the following principles:</p> <p>1 To promote the conservation and enhancement of the multiple heritage assets in the area through sensitive</p>	<p>New Elements – further SA Appraisal required</p> <p>Parts 1 to 3 have been taken from the previous Character Area</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<ul style="list-style-type: none"> <li>• 150 homes; and</li> <li>• 1,400sqm net retail (focused on the Ladywell Leisure Centre site)</li> </ul> <p>The Council has identified the following key principles within the Ladywell Road character area:</p> <p>1 Conserve and enhance the heritage assets in the area through sensitive development and environmental improvement.</p> <p>2 Support efforts to bring the Ladywell Baths (Playtower) site back into use so the building can once again play a key role in community life.</p> <p>3 Promote the Ladywell Leisure Centre site for redevelopment for an appropriate mix of uses including retail and residential.</p> <p>4 Promote development that contributes to the Lewisham Low Carbon Zone target to reduce CO2 emissions of 20% by 2012 and a 60% reduction by 2025</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <ol style="list-style-type: none"> <li>a. Investing in the Waterlink Way initiative.</li> <li>b. Ensuring the heritage assets contribute positively to community life.</li> <li>c. Highway improvements particularly by the Ladywell Leisure Centre site.</li> <li>d. Support delivery of the Low Carbon Zone CO2 reduction targets</li> <li>e. Public access to non-residential car parking</li> </ol>	<p>development and environmental improvement.</p> <p>2 Support efforts to increase the hub of community facilities in Ladywell Road. In particular, to bring the Ladywell Playtower building back into active community use.</p> <p>3 Promote development that contributes to the Lewisham Low Carbon Zone target to reduce CO2 emissions of 20% by 2012 and a 60% reduction by 2025</p> <p><b>4. There may be smaller development opportunities fronting Ladywell Road. All developments should provide a mix of uses suitable to an edge of town centre location and ensure active frontages to streets.</b></p>	<p>Policy 5.</p> <p>Part 4 is new, highlighted in bold and italics.</p> <p>The following text has been removed from the policy and added to the supporting text:</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <ol style="list-style-type: none"> <li>a. Investing in the Waterlink Way initiative.</li> <li>b. Ensuring the heritage assets contribute positively to community life.</li> <li>c. Highway improvements particularly by the Ladywell Leisure Centre site.</li> <li>d. Support delivery of the Low Carbon Zone CO2 reduction targets</li> <li>e. Public access to non-residential car parking</li> </ol>
<p><b>SITE SPECIFIC POLICY 5.1: Ladywell Leisure Centre site</b></p> <p>The Council will seek to bring forward a</p>	<p><b>Additional site specific requirements:</b></p> <p><b>S8 Ladywell leisure centre site</b></p> <p>The Council will seek to bring forward a comprehensive</p>	<p>No further SA Appraisal required.</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>comprehensive development of this site and adjoining land where appropriate for a mix of uses including retail (A1-A3) and housing (C3).</p> <p>The following key principles will apply:</p> <p>1 New development should seek to improve vehicular servicing of adjoining land to the south.</p> <p>2 Proposals could include the redevelopment of Lewisham Free School, subject to the allowance being made for alternative provision of equivalent benefit to the community (see LTC COM3).</p> <p>3 Proposals should seek to enhance the Lewisham High Street frontage through the incorporation of active uses at groundfloor and enhancements to the public realm in front of the site and enhancements to permeability through the site. Residential units should be situated at upper levels and to the rear of the site with associated amenity space provision.</p> <p>4 Opportunities to establish a site-specific communal energy system with potential to link into a larger Lewisham Hospital decentralised energy system in the longer term will be encouraged.</p>	<p>development of the Ladywell Leisure Centre site and adjoining land where appropriate for a mix of uses including retail (A1-A3) and housing (C3).</p> <p>The following key principles will apply:</p> <p>a) New development should seek to improve vehicular servicing of adjoining land to the south.</p> <p>b) Proposals should seek to enhance the Lewisham High Street frontage through the incorporation of active uses at groundfloor and enhancements to the public realm in front of the site and enhancements to permeability through the site. Residential units should be situated at upper levels and to the rear of the site with associated amenity space provision.</p> <p>c) Opportunities to establish a site-specific communal energy system with potential to link into a larger Lewisham Hospital decentralised energy system in the longer term will be encouraged.</p> <p>d) Proposals could include the redevelopment of Lewisham Free School, subject to the allowance being made for alternative provision of equivalent benefit to the community (see LTC COM3).</p>	
<p><b>CHARACTER AREA POLICY 6: Central area character area</b></p> <p>Development opportunities in the Central Character Area have the following indicative capacity:</p> <p>200 homes; and</p> <p>600sqm net retail</p> <p>The Council has identified the following key principles within the Central area character area:</p> <p>1 As the centre is managed, refurbished and redeveloped over time, ensure every opportunity is taken to improve the number and nature of the eastwest connections across the shopping centre area;</p>	<p><b>Policy LAAP8 Lewisham Centre Town Centre Area</b></p> <p>The Council has identified the following key principles within the Central Town Centre Area:</p> <p>1 As the centre is managed, refurbished and redeveloped over time, ensure every opportunity is taken to improve the number and nature of the east-west connections across the shopping centre area</p> <p>2 Create a more coherent and pleasant environment which meets the needs of both pedestrians and vehicles</p> <p>3 Secure investment in the Waterlink Way concept along the alignment of the River Ravensbourne</p> <p>4 Create an active frontage to Molesworth Street</p> <p>5 Working in partnership with market traders and other</p>	<p>No further SA Appraisal required</p> <p>There is nothing new in this policy. Parts 1 to 5 are from the previous Character Area Policy 6 and part 6 is taken from the previous site specific parts.</p> <p>The following text has been removed from the policy and added to the supporting text:</p> <p>Development opportunities in the Central Character Area have the following indicative capacity:</p> <p>200 homes; and</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p>2 Create a new southern anchor for Lewisham High Street to encourage customers to travel the full length of the High Street;</p> <p>3 Create a more coherent and pleasant environment which meets the needs of both pedestrians and vehicles, including possibly replacing the current roundabout arrangement with a signified junction (subject to satisfactory traffic modelling and design development) and maintaining and where possible enhancing the existing Shopmobility scheme;</p> <p>4 Achieve a welcoming and accessible gateway to the centre at the northern (interface with Lewisham Gateway) and southern entrances to the centre through high quality architecture and urban design;</p> <p>5 Secure investment in the Waterlink Way concept along the alignment of the River Ravensbourne;</p> <p>6 Create an active frontage to Molesworth Street; and</p> <p>7 Working in partnership with market traders, achieve environmental improvements to Lewisham High Street and market area.</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <p>a. Secure contributions to investment in the Waterlink Way initiative;</p> <p>b. Secure long term improvements to the Lewisham street market; and</p> <p>c. Secure environmental improvements to the pedestrianised areas of Lewisham High Street and the Molesworth Street corridor including improved pedestrian crossings and landscaping measures.</p> <p>d. Promotion of long-term decentralised energy</p>	<p>stakeholders, achieve environmental improvements to Lewisham High Street and market area</p> <p>6 The area is within Flood Zone 3A high Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p>	<p>600sqm net retail</p> <p>And</p> <p>In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:</p> <p>a. Secure contributions to investment in the Waterlink Way initiative;</p> <p>b. Secure long term improvements to the Lewisham street market; and</p> <p>c. Secure environmental improvements to the pedestrianised areas of Lewisham High Street and the Molesworth Street corridor including improved pedestrian crossings and landscaping measures.</p> <p>d. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
options (either by direct provision or by safeguarding opportunities)		
<p><b>SITE SPECIFIC POLICY 6.1: Land north east of the shopping centre</b></p> <p>The Council will encourage redevelopment of the corner site north east of the shopping centre in conjunction with more comprehensive improvements to the Lewisham Centre to provide retail (A1-A3) and/or leisure use (D2) on the ground floor with commercial and/or residential (C3) on the upper floors. Such redevelopment should take account of the following principles:</p> <p>1 Redevelopment should respond positively to the Lewisham Gateway development and tall buildings may be considered appropriate subject to Core Strategy Policy 18;</p> <p>2 Forming the northern end of the core shopping area, any redevelopment should seek to retain commercial uses at ground floor level on Lewisham High Street;</p> <p>3 Active frontages should be provided at ground floor level to Lewisham High Street, the new connection road between Lewisham High Street and Molesworth Street and the new entrance mall to the shopping centre; and</p> <p>4 New residential development should not require new dedicated car parking spaces, making wheelchair accessible housing here inappropriate.</p> <p>5 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p>	<p><b>Additional site specific requirements:</b></p> <p><b>S8 Land north of the shopping centre</b></p> <p>This site comprises land to the north east of the shopping centre, the Citibank Tower and the land surrounding it. Redevelopment of the site could be in sections or phases, following the principles identified below:</p> <p>a) Redevelopment will be encouraged in conjunction with more comprehensive improvements to the Lewisham Centre to provide retail (A1-A3) and/or leisure use on the ground floor with commercial and/or residential on the upper floors.</p> <p>b) Active frontages (see Fig 4.6) should be provided at ground floor level to Lewisham High Street, the new connection road between Lewisham High Street and Molesworth Street and the new entrance mall to the shopping centre.</p> <p>c) Proposals which include the recladding or redevelopment of Citibank Tower and it's surrounds will be encouraged. More intensive office use or residential conversion would be favourably considered by the Council.</p> <p>d) Redevelopment (including taller elements) should respond positively to the Lewisham Gateway development and provide a welcoming and accessible entrance to the centre from Lee High Road.</p> <p>e) New development should be mindful of future aspirations both on site and on nearby sites including required connections</p>	<p>No new information – No further SA required</p> <p>The previous Site Specific Policies 6.1 Land north east of the shopping centre and 6.3 Citibank tower have been combined into one site – S8 Land north of the shopping centre.</p> <p>Parts a, b and d are from previous Site Specific Policy 6.1, while c is taken from 6.3.</p>
<p><b>SITE SPECIFIC POLICY 6.2: Land south of the</b></p>	<p><b>Additional site specific requirements:</b></p>	<p>No new information – No further</p>

AAP FO March 2011 Area Wide Policies	AAP Pre- Submission Version Area Wide Policies	SA Required
<p><b>shopping centre</b></p> <p>The Council will encourage the comprehensive redevelopment of the Beatties Buildings and Model Market sites to provide retail or leisure uses on the ground floor with commercial and/or residential uses on the upper floors. Such redevelopment should take account of the following principles:</p> <p>1 Redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre and may take the form of an extension to the shopping centre.</p> <p>2 Buildings should make best use of the corner site and provide enclosure and active frontage to both Molesworth Street and Lewisham High Street as positive public spaces.</p> <p>3 New residential development should not require new dedicated car parking spaces making wheelchair accessible housing here inappropriate.</p> <p>4 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.</p>	<p><b>S9 Land south of the shopping centre</b></p> <p>a) Comprehensive redevelopment of the Beatties Buildings and Model market sites should provide retail (A1-A3) or leisure uses on the ground floor with commercial and or residential uses on the upper floors.</p> <p>b) The redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre, while respecting the local surroundings. It should create a new southern anchor for Lewisham High Street to encourage customers to travel the full length of the High Street</p> <p>c) Buildings should make the best use of the corner site and provide enclosure and active frontages to both Molesworth Street and Lewisham high Street as positive public space</p>	<p>SA required</p> <p>This policy is taken entirely from the previous Site Specific Policy 6.2. There are no new elements.</p>
<p><b>SITE SPECIFIC POLICY 6.3: Citibank Tower</b></p> <p>Citibank Tower is an important landmark for Lewisham and an anchor for commercial life; however its appearance does not fulfil its potential in this respect.</p> <p>Proposals which include the recladding or redevelopment of the tower will be encouraged in order to enhance the character and identity of Molesworth Street and the wider town centre. More intensive office use or residential conversion would be favourably considered by the Council.</p>	<p>Included in the above</p>	<p>No new information – No further SA required</p> <p>This is now part of S8 Land north of the shopping centre</p>



**Table 2: Area-wide policy development from Issues and Options to Preferred Option to AAP Draft Policy**

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<b>Housing</b>				
<b>ISSUE LTC1: The Borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?</b>				
<p><b>LTC1A</b> Have policies seeking to increase the density of residential uses (see issue LTC3)</p>	<p>The preferred option is an approach that combines elements of all three options to have policies which encourage high density residential uses [LTC1A], encourage the redevelopment or conversion of existing</p>	<p>LTC HSG1 - MEETING HOUSING NEED New development should, where possible, include residential uses at an appropriate density (see LTC HSG 6) to ensure land is being put to best use and assist in meeting the borough's housing target of 9,750 additional dwellings by 2016.  It is estimated that mixed use development of key sites as identified in the Opportunity Area policies and on the Proposals Map will allow provision for approximately 4,100 additional homes. Table 1</p>	<p>Omitted</p>	<p>Not required as repetition of London Plan targets.  Density is specified in CSP15.  CSSP2 states 2,600 additional homes, not 4,100.</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p><b>LTC1B</b> Have policies encouraging the redevelopment or conversion of existing sites with residential uses as part of a mix (e.g. employment/ retail ground floor with residential above).</p>	<p>sites with residential uses as part of a mix [LTC1B] and also encourages new mixed use (to include residential units of varying size and tenure) development in the town centre, perhaps by the allocation of specific additional sites. [LTC1C].</p>	<p>outlines the estimated number of additional homes for each Opportunity Area.</p> <p><b>LTC HSG2 – MIXED USE DEVELOPMENT</b> The Council will expect new development in the town centre to provide a mix of uses, including independent residential accommodation with separate access. Exceptions may be considered where it can be demonstrated that the site is not suitable to accommodate a mix of uses. Guidance for appropriate mix of uses for key development sites is provided in the Opportunity Area policies.</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p>Omitted</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Covered by CSP1 and London Plan LP3.3, LP4.2</p>
<p><b>LTC1C</b> Promote new development in the town centre including residential uses as part of a mix of uses. This could be achieved by the allocation of specific additional sites in the town centre to include some residential development of varying size and tenure.</p>		<p><b>LTC HSG3 – CONVERSION OF EXISTING BUILDINGS</b> The Council will encourage the conversion of existing buildings such as vacant offices or premises above shops for residential purposes provided that:</p> <p>(a) a satisfactory living environment can be provided; (b) there is no conflict with existing land uses; and (c) the proposal complies with policy LTC EMP2.</p>		

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes		
<b>ISSUE LTC2: The Council will seek to deliver and exceed an additional 9,750 homes to be built by 2016, of which 3,160 will be affordable housing. Should there be a specific town centre affordable housing policy?</b>						
<b>LTC2A</b> No specific affordable housing policy is required for Lewisham town centre, and a Borough wide affordable housing policy should be adhered to.	The preferred option for this issue is closest to LTC2A, to provide no specific affordable housing policy for Lewisham town centre, with adherence to the Borough wide affordable housing policy by default. In addition to affordable housing, the preferred option encourages provision of a policy on dwelling mix.	<b>LTC HSG4 – AFFORDABLE HOUSING</b> Where a development site is capable of accommodating 10 or more dwellings or is 0.3 hectares or more, the Council will seek to secure 35% of new residential build as affordable housing. The required affordable housing tenure mix will be 70% social rented and 30% intermediate provision delivered across private sites.	<b>Omitted</b>	Repetition of Core Strategy and London Plan policies: CSP1 / LP3.12, LP3.13 and LP3.14  CSP1 – starting point for negotiation = 50% affordable.		
<b>LTC2B</b> A policy which takes a more flexible approach to the provision of affordable housing in Lewisham town centre in terms of size, tenure, location and quantity of provision. This may result in the delivery of fewer affordable homes than option LTC2A.		Developers would be required to demonstrate a mechanism for retaining affordable housing in perpetuity.  <b>LTC HSG5 – DWELLING MIX</b> The Council will expect new housing development on proposals for 10 units or more to provide a full mix of dwelling type and sizes, including family units. A family unit is considered to consist of 3 or more bedrooms and include a directly accessible, private amenity space of appropriate size. The degree of the housing mix for any given site will depend on local circumstances and site characteristics. The Council will encourage innovative and imaginative solutions to dwelling mix and provision of outdoor amenity space.			<b>Omitted</b>	Both are repetition of London Plan and Core Strategy and there is no evidence for a town centre specific approach
<b>LTC2C</b> A policy approach which seeks to deliver						

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>No change</li> <li>Omitted</li> <li>Retained with amendment</li> <li>New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
a higher proportion of affordable housing in Lewisham town centre. This may result in the delivery of more affordable homes than option LTC2A.				
<b>ISSUE LTC3: How best can the AAP process promote higher residential densities in areas of high public transport accessibility?</b>				
<b>LTC3A</b> Retain existing Sustainable Living Area (SLA) approach (as defined in the existing UDP).	The preferred option is a combination of all three options; to bring forward an approach that seeks higher densities in a sustainable location (similar to the SLA approach of the current UDP) and also to support car-free housing where appropriate and to consider the removal of rights to on-street parking permits for occupiers of new residential developments.	<b>LTC HSG6 – HOUSING DENSITY</b> The Council will expect housing densities of new development to be appropriate to the local setting in terms of existing building form, massing and character. For guidance, the Council will consider Lewisham Town Centre a ‘Central’ setting when referring to the London Plan Density Matrix (Table 4B.1, London Plan, 2004).	<b>Omitted</b>	CSP15 states that LTC must be considered as ‘Central’ in relation to LP table 3.2 under Policy 3.4
<b>LTC3B</b> Promote car-free housing.		<b>LTC HSG7 – A RESTRICTIVE APPROACH TO RESIDENTIAL PARKING</b>	<b>Omitted</b>	CSP14 / LP6.1 provide appropriate standards
<b>LTC3C</b> Consider the removal of rights to street parking permits for occupiers of new residential developments.		Within Lewisham Town Centre, the Council will promote car-free housing. As a starting point in negotiation with developers, the Council will seek not to issue new on-street parking permits for inhabitants of new residential development. Exceptions may be made for people with disabilities and mobility problems.		

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<b>ISSUE LTC4: How should the AAP make provision for the traveller community?</b>				
<b>LTC4A</b> Identify and allocate a traveller site within Lewisham town centre.	The preferred option is option LTC4C which states that criteria based policy should be included within the AAP in order to provide a framework to assess the suitability of new proposals.	<b>LTC HSG8 – TRAVELLERS’ SITES</b> There are no identified travellers’ sites within the Lewisham Town Centre. However, if proposed within the town centre, gypsy and travellers’ sites will be assessed against the following criteria:  (a) it is accessible to local shops, services and community facilities in particular schools and health services;  (b) it has safe and convenient access to the road network;  (c) it has provision for parking, turning, service and emergency vehicles and servicing of vehicles;  (d) the activities do not have an adverse impact on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site;  (e) it has a supply of essential services such as water, sewerage and drainage and waste disposal; and	Omitted	CSP2 identifies a policy approach and sites are to be identified for this use through the Site Allocations process.
<b>LTC4B</b> Identify and allocate a traveller site outside Lewisham town centre.				
<b>LTC4C</b> Include a criteria based policy in order to provide a framework to assess the suitability of new proposals.				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		(f) it is designed and landscaped to a high standard.		
<b>OTHER POLICIES</b>		LTC HSG9 – RESIDENTIAL STANDARDS Proposals for residential development should provide an acceptable standard of accommodation in accordance with Council’s Supplementary Planning Document “Residential Development Standards”, June 2006.	<b>Omitted</b>	Repetition of LP Policy 3.6 and SPD
<b>Shopping and Town Centre</b>				
<b>ISSUE LTC 5: How can Lewisham town centre best move towards Metropolitan Centre status?</b>				
<b>LTC5A</b> Rely on existing site allocations for new retail development in the town and determine applications for additional retail developments on their merits.	Option LTC5B is the preferred option.	LTC SH1 – LEWISHAM TOWN CENTRE The Council will seek to increase the amount of retail floorspace, in particular comparison floorspace, to support Lewisham's move from a Major Centre to a Metropolitan Centre. Approximately 43,000m2 of additional food and non food retail floorspace is anticipated to be provided within the short to long term mixed use development of the following site allocations:	<b>Omitted</b>	CSSP2 covers this strategic target. Although policy is not required, site specific character area policies incorporate broad capacities for implementation purposes
<b>LTC5B</b> Allocate new sites for retail development with regard to the retail capacity study in order to plan for and accommodate identified retail		(a) Lewisham Gateway (b) Lewisham Centre and land south of Lewisham Centre (c) Lee High Road – western and eastern ends (d) Loampit Vale (e) Conington Road - Tesco block		

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>No change</li> <li>Omitted</li> <li>Retained with amendment</li> <li>New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
capacity to help the town centre move toward the floorspace required to achieve Metropolitan Status (100,000sqm).		(f) Engate Street		
<b>ISSUE LTC6: How can Lewisham town centre's vitality and viability be best supported?</b>				
<b>LTC6A</b> Public realm enhancements	It is considered that in order to promote the vitality and viability of Lewisham town centre, a combination of all options would prove most effective. The draft policies also recognise the importance of the market in supporting the vitality and viability of the market.	LTC SH2 – VITALITY AND VIABILITY Development should sustain and enhance the vitality and viability of the town centre <b>in the context of the strategic development of Lewisham Gateway</b> . To ensure this, the Council will encourage the following: <b>(a) Implementation of Lewisham Gateway proposals (see Core Strategy Strategic Site Allocations Policy 6)</b> <b>(b)</b> Public realm enhancements (see LTC URB6); <b>(c)</b> Retail and mixed use allocations on key development sites (LTC URB4); <b>(d)</b> A greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer (see LTC SH8); <b>(e)</b> Incorporation of design principles such as a mix of uses, active frontages and effective street lighting with a view to making the town centre a safer place (see LTC URB4, LTC URB5 and LTC URB6); <b>(f)</b> Shopfront improvements and funding programmes (see shopfront Supplementary	Retained with amendment	There is a clear need for specific policies that focuses on the vitality and viability of the town centre and the market as an extension of CSSP2. Minor amendments and additions to ensure policy is comprehensive.
<b>LTC6B</b> Encourage new development on the Lewisham Gateway site to raise profile of town centre as a whole				
<b>LTC6C</b> Support a greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer				
<b>LTC6D</b> Make Lewisham a safer place				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p><b>LTC6E</b> Support shopfront improvements and funding programmes</p> <p>LTC6F Allocate new sites for retail development</p> <p>LTC6G Encourage a greater mix of uses within the town centre including residential development (see LTC1)</p> <p>LTC6H Redevelop at key locations within the High Street to provide marker buildings with mix of uses.</p>		<p>Planning Document); and (g) A greater component of residential development within the town centre within the overall mix of uses (see <del>LTC HSG1 and LTC HSG2</del> <b>LTC COM1 and LTC BOM2</b>).</p> <p>LTC SH3 – LEWISHAM MARKET The Council will continue to promote Lewisham Market as an essential part of the retail centre and encourage ancillary facilities in order to maintain its viability. The Council will investigate, in consultation with market traders, retailers and other town centre stakeholders, ways in which the Market can be improved, <b>including the temporary use of the Market space for alternative activities (e.g. street food stalls or informal leisure activities) in the evenings and other times when the Market is not in use.</b></p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p>Retained with amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p><b>ISSUE LTC7: If implemented Lewisham Gateway has the potential to bring wide ranging benefits to the town centre. How should the AAP address the issues associated with Lewisham Gateway?</b></p>				
<p><b>LTC7A</b> Allocate the Lewisham Gateway site for high</p>	<p>It is considered that a combination of options LTC7A, C</p>	<p>LTC SH4 – IMPACT OF LEWISHAM GATEWAY ON SOUTHERN PART OF THE TOWN CENTRE In order to address the change in the centre of</p>	<p>Omitted</p>	<p>CSP6 and CSSP2 provide a general indication of the</p>



Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>density mixed use development.</p> <p><b>LTC7B</b> Rely on existing development site allocations in the UDP to facilitate redevelopment of the roundabout site.</p> <p><b>LTC7C</b> Identify and allocate sites in the southern part of the centre for redevelopment in order to seek to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development.</p> <p><b>LTC7D</b> Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime</p>	<p>and D should be used to address the issues associated with Lewisham Gateway.</p>	<p>gravity that is likely to result from the Lewisham Gateway development the Council will promote the creation of a secondary focus of activity at the southern end of the pedestrianised High Street, incorporating a mix of uses.</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>need to maintain vitality and viability in relation to the town centre and retail frontages. LTC SH4 promotes a strategic response to the Gateway proposals and has incorporated within a re-cast SH2.</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>retail. This role might be a focus for community activity, with the library representing an obvious stimulus for this type of activity. An alternative focus would be evening economy uses.</p>			<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p><b>ISSUE LTC8: What approach should the AAP take to the designations of core and non-core shopping frontages?</b></p>				
<p><b>LTC8A</b> Maintain current distinction between core and non-core frontages as currently on the proposals map.</p>	<p>The preferred option for the approach to the designation of core and non-core shopping frontages in Lewisham town centre is derived from options LTC8B and C.</p>	<p>LTC SH5 – <b>CORE PRIMARY SHOPPING AREAS</b> Within the Core Shopping Areas, as defined on the <del>Proposals Map</del> and indicated in Figure 13.4, the Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions:</p> <p>(a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1 uses and 70% maintained in A1 use);</p> <p>(b) Whether the proposal will generate a significant number of pedestrian visits; and</p> <p>(c) Whether the proposal uses vacant units (having regard both to their number within the centre as a</p>	<p>Retained with amendment</p>	<p>Renamed Primary Shopping Areas. Para 6.93 of the Core Strategy confirms the Council's intention to identify primary and secondary shopping areas. Table 4.2 identifies current primary and secondary frontages in Lewisham town.</p> <p>CSP6 identifies the intention to designate primary</p>
<p><b>LTC8B</b> Review existing allocation of core and non core frontages</p>				
<p><b>LTC8C</b> Introduce a geographical basis for designating retail zones with scope for integrating a more diverse mix of uses</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
including evening economy.		<p>whole and the Core Area and the length of time they have been vacant).</p> <p>All proposals for non retail development within Core Areas, including where relevant changes of use, should:</p> <p>(d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and</p> <p>(e) Where appropriate, provide attractive display windows and entrances that are compatible with adjoining shop units.</p> <p><b>LTC SH6 – NON-CORE SECONDARY SHOPPING AREAS</b></p> <p>Within the Non Core Shopping Areas, as defined on the Proposals Map, and indicated in Figure 4.3, proposals for development or change of use from an A1 shop will generally be acceptable provided:</p> <p>(a) It is to another A use class, community use or amusement centre where such a change does not result in an over-concentration of non A1 uses (normally 3 non A1 uses);</p> <p>(b) It does not harm the amenity of adjoining properties;</p> <p>(c) It does not harm the retail character (with</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p style="text-align: center; color: orange;">Retained with amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>and secondary areas.</p> <p>Renamed Secondary Shopping Areas (see above)</p>
<p><b>LTC8D</b></p> <p>Remove shopping frontage allocations and rely on town centre boundary.</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>reference to Policy LTC SH7), attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units; and (d) It is considered appropriate in relation to the area's specific retail character.</p> <p><b>LTC SH7 – RETAIL CHARACTER AREAS</b> The town centre benefits areas of discrete retail character which, individually and collectively contribute positively to the vitality and viability of the centre. There are also areas where major retail led developments are anticipated and the retail character that they create will be an important consideration. Development proposals should take account of, not compromise and seek to complement existing and anticipated retail character of specific parts of the town centre as follows:</p> <p>1. Lewisham Gateway The retail character that should be aspired to in this area is a mixture of retail and leisure uses. Creation of an open space at the confluence of rivers provides opportunity for cafes, bars and similar uses.</p> <p>2. Lee High Road The western end of Lee High Road is a mixed use traditional high street with retail (A1 &amp; A3) at ground</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p><b>Retained with amendment</b></p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>LTC SH7 provides a useful bridging point between area wide retail / vitality policies and guidance for individual character areas</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>floor and flatted accommodation above. Retailing on Lee High Road has a strong independent character and frontages are relatively short. There are already high concentrations of take-away and other non-retail uses and care will need to be taken to ensure over concentrations are not established.</p> <p>3. Loampit Vale North The retail character that should be aspired to at this 'edge of centre' location is for large retail units, with parking, to support primary shopping.</p> <p>4. Ladywell Road Ladywell is a mixed area with a good range of secondary retailing providing everyday servicing needs of the local area. Most commercial premises have shopfronts of traditional character. Ladywell Road is more residential in character, with several community uses and a limited number of commercial uses.</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<b>ISSUE LTC9: How should the town centre's potential for a more vibrant evening economy be managed?</b>				
<p><b>LTC9A</b> Do not provide a specific town centre policy approach.</p>	<p>The preferred option for the approach to managing the town centre's potential for</p>	<p>LTC SH8 – CRITERIA FOR EVENING ECONOMY USES The Council will encourage proposals for new uses that would positively contribute to the evening</p>	<p>Retained with amendment</p>	<p>Specific principles for evening economy uses is required for the</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<b>LTC9B</b> Maintain existing core and non-core frontage approach.	a more vibrant evening economy is derived from options LTC9C and D	economy of the town centre where the following criteria are met:  (a) The retail character of the area is not harmed (with reference to LTC SH8 7), and in particular the retail character of the core shopping area; (b) The proposal would contribute positively to the character of the particular area, as outlined in the LTC SH8 7; and (c) The cumulative impact of the proposal does not unreasonably harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours.  It is considered that the following areas would be suitable locations for evening economy uses, as part of a wider mix of uses:  (a) Lewisham Gateway (b) Lewisham High Street between Limes Grove and Morley Road (c) Ladywell (d) Lee High Road	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	LP = Draft London Plan CS = Emerging Core Strategy  town centre to expand upon general policy guidance
<b>LTC9C</b> Encourage evening economy uses as part of a mix of uses in specified locations.				
<b>LTC9D</b> Concentrate evening economy uses in a particular zone.				
<b>ISSUE LTC10: Should the town centre boundary be altered?</b>				
<b>LTC10A</b> Maintain existing town	The preferred option is LTC10B with the	LTC SH9 - TOWN CENTRE BOUNDARY The AAP boundary is defined as set out in the	No change	AAP requires clear definition of town

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>centre boundary</p> <p><b>LTC10B</b> Review town centre boundary to achieve a tighter core by removing one or more of the following options:</p> <p>LTC10Bi) North-west corner of the town centre west of the DLR and north of the railway. The area around Armoury Road is former industrial land that was comprehensively redeveloped for housing in the 1980's. The area benefits from very good levels of public transport accessibility being within walking distance (via a railway arch opposite Jerrard Street) to Lewisham mainline and DLR</p>	<p>removal of areas LTC10B(iii) and LTC10B(iv) from the town centre boundary. These areas are predominantly residential and therefore are considered not to contribute positively to the centre's vitality and viability. As such the removal of the two areas will result in a tighter, more logical and defensible town centre boundary.</p>	<p>following plan (see main document):</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>centre boundary</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>stations and the numerous associated bus routes and Elverson Road DLR station.</p> <p>LTC10Bii) Conington Road area east of the DLR and north of the railway. This mixed-use area is occupied by a large Tesco store and associated decked and surface car park, some industrial units on the east side of Conington Road and established residential housing blocks to the west. The area benefits from very good levels of public transport accessibility being within walking distance to Lewisham mainline and DLR stations and the numerous associated bus routes and</p>				



Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>Elverson Road DLR station.</p> <p>LTC10Biii) Area around Caterham and Boyne Roads, south of railway and north of Lee High Road. This established residential area is immediately to the east of the new divisional police station and to the north of the secondary shopping facilities along Lee High Road. The area falls within the Blackheath Conservation Area.</p> <p>LTC10Biv) Limes Grove Area – This established residential area lies on the immediate eastern side of Lewisham High Street north of the railway line.</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>LTC10Bv) Southern end of the High Street south of the railway, towards Ladywell. The character and feel of the town centre changes south of the railway as one approaches Ladywell. This is a mixed part of town with the High Street presenting a range of secondary retail services together with the Ladywell Leisure Centre to the south. A large Council depot occupies land immediately to the south of the converging railway lines. The depot is accessed through an area of established and mixed Edwardian housing. At the southern extreme of</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>the town centre is the St. Mary's centre.</p> <p>LTC10Bvi) Jerrard Street, Loampit Vale and Elmira Street area – this is the large and varied area with a wide range of land uses. Large scale retail warehousing units dominate the north side of Loampit Vale together with some small scale employment uses. The Sundermead housing estate is undergoing a phased comprehensive redevelopment on the south of Loampit Vale where Lewisham Bridge Primary School is also located. Generally the area is well located to benefit from the good levels of public transport</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
accessibility provided by Lewisham Station.			<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	LP = Draft London Plan CS = Emerging Core Strategy
<b>Urban Design</b>				
<b>ISSUE LTC11: What approach should be taken to the location and design of tall buildings in Lewisham town centre?</b>				
<b>LTC11A</b> Retain exiting approach whereby tall buildings are considered appropriate in Lewisham town centre if the site is covered by a development brief identifying it as such.	Tall buildings are a useful way to achieving high densities, however it is important that their siting is managed effectively and that the highest quality architecture is emphasised, therefore the preferred option is a combination of options LTC11A and D. Where a site is not covered by a development brief which identifies it as a suitable location for tall buildings [LTC11A] the council should set out the specific criteria against which all	<b>LTC URB1 – TALL BUILDINGS IN LEWISHAM TOWN CENTRE</b> Planning applications for tall buildings may be permitted in Lewisham Town Centre subject to assessment of the following factors:  (a) Design of tall buildings should be of the highest architectural quality; (b) The degree to which the proposal makes a positive response to urban setting and townscape; (c) Transport accessibility and impact of the proposal; (d) The visual impact of the proposed development on Strategic and Local views; (e) Effect on Listed Buildings themselves and the setting of Conservation Areas; (f) Effect on Metropolitan Open Land and other open spaces; (g) Relationship to existing tall buildings and structures; (h) Relationship with the town centre's topography;	<b>Omitted</b>	CSP18 identifies Lewisham TC as a place where tall buildings will be directed to and sets out design criteria.  The emerging proposals plan highlights local landmarks which are relevant in terms of views and legibility.
<b>LTC11B</b> Seek generally to encourage tall buildings in the town centre, removing the requirement for development brief endorsement.				
<b>LTC11C</b> Seek to encourage tall buildings in specific				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>location(s).</p> <p><b>LTC11D</b> Set out criteria against which all development for tall buildings will be considered, including the requirement to demonstrate the highest quality architecture.</p>	<p>developments for tall buildings will be considered [option LTC11D].</p>	<p>and</p> <p>(i) Impact on microclimate and overshadowing.</p> <p>All development applications for tall buildings must be accompanied by:</p> <p>(a) an environmental impact assessment; and</p> <p>(b) a design and access statement.</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan</p> <p>CS = Emerging Core Strategy</p>
<p><b>OTHER POLICIES</b></p>	<p>LTC URB2 – SUSTAINABILITY</p> <p>Development should be designed to achieve the best possible outcomes in terms of sustainable development through:</p> <p>(a) high density, mixed use developments with convenient pedestrian and cycle access to shops, services, community facilities and public transport facilities;</p> <p>(b) mix of residential tenures and unit sizes;</p> <p>(c) best use of Lewisham's natural resources, including its rivers;</p> <p>(d) developments that allow maximum flexibility in accommodating a range of uses over time;</p> <p>(e) innovative ways of reducing the need for private vehicles;</p> <p>(f) sustainable design and construction;</p> <p>(g) construction materials from sustainable resources and use of recycled and re-used materials;</p> <p>(h) incorporation of renewable energy;</p> <p>(i) protection and conservation of water supplies including minimisation of</p>	<p>Omitted</p>	<p>Core Strategy policies and other LDF documents cover the majority of these specific policy areas which are considered Borough-wide rather than AAP specific. The exception is carbon dioxide emissions which is a new issue.</p>	

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>treated water, maximisation of harvesting opportunities and incorporation of grey water recycling systems;</p> <p>(j) sustainable urban drainage systems;</p> <p>(k) flood risk assessment, including adequate flood protection and mitigating measures where necessary;</p> <p>(l) Air Quality Impact assessment; and</p> <p>(m) Waste Management Plans for both construction and occupation stages.</p> <p><b>LTC URB3 - HIGH QUALITY DESIGN</b>  The Council supports a commitment to working with the highest quality architects and urban designers to ensure that the aspirations for these sites are realised. Design competitions and partnership working will be encouraged to promote high quality design, particularly on key sites promoted through the opportunity area policies.</p> <p><b>LTC URB4 – MIXED USE</b>  An appropriate mix of compatible land uses will be encouraged both vertically and horizontally in Lewisham Town Centre. In particular, high density residential development above ground floor retail and commercial uses will be encouraged. Wherever possible, new development should be designed to accommodate active uses at ground floor level, with significant amount of window display and entrances.</p> <p><b>LTC URB5 - URBAN ENCLOSURE, GRAIN</b>  Urban enclosure and urban grain play a critical role in creating good quality</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p><b>Omitted</b></p> <p><b>No change</b></p>	<p>LP = Draft London Plan  CS = Emerging Core Strategy</p> <p>Covered in more detail by CSP15</p> <p>Specific guidance required for town centre</p> <p>Specific guidance</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>environments and the following principles should be considered in any proposals for development:</p> <p>(a) Public spaces should be strongly defined by the built edges that surround them and groups of building should be designed to form unified urban 'backdrops'.</p> <p>(b) Existing street patterns should be respected and where possible extended in areas of new development. Single-use and overly long blocks should be avoided.</p> <p>(c) Buildings should front public spaces, and on major streets and public spaces 'backs' of properties should be avoided wherever possible.</p> <p>LTC URB6 - PUBLIC REALM</p> <p>Public spaces in Lewisham should be designed to be attractive, safe and robust through consideration of the following factors:</p> <p>(a) Unnecessary street clutter should be avoided, and where it is useful and functional, street furniture and lighting should be designed to delight.</p> <p>(b) The provision of public art in association with all major development in the town centre will be encouraged and should be considered at the early stages of the design process.</p> <p>(c) Development should enhance community safety through the overlooking of entrances and exits and clear definition of public and private space. Developers should show how they have taken 'Secure by Design' into account <b>with a view to 'designing out' crime.</b></p> <p>(d) New development and public space improvements should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes. Enhancements to</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p>No change</p> <p>Retained with minor amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>required for town centre</p> <p>Specific guidance required – minor amendments incorporated</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>connections between the town centre and surrounding residential communities are particularly important.</p> <p><b>(e) The Council will promote opportunities to make innovative use of existing and additional public realm areas as publicly accessible open space that can be used for recreation purposes and events and footways and civic spaces need to be generously sized, designed and managed accordingly.</b></p> <p><b>(f) Development should ensure that the public realm and development projects incorporate inclusive design principles. The Council will also seek to make provision for shopmobility initiatives.</b></p> <p>LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS</p> <p><del>In close liaison with the Environment Agency, new development in close proximity to the rivers should be designed to address the river positively, to create attractive waterfront environments, to respect and enhance natural habitats and to accommodate appropriate flood defences and should contribute to the physical environmental improvement of the river corridors.</del></p> <p><b>The Council will seek to protect and enhance the environs of the River Quaggy and the River Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the de-culverting of rivers and programmes of naturalisation of riparian</b></p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p>New Policy</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Specific guidance required – minor amendments incorporated</p>



Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
	<p><b>environments. Proposals should also respond positively to waterway heritage.</b></p> <p><b>The Council will seek to safeguard Waterlink Way, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency.</b></p> <p><b>The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park as shown in Figure 3.</b></p>		<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan</p> <p>CS = Emerging Core Strategy</p>
<b>Employment and Business</b>				
<b>ISSUE LTC12: What policy approach should be taken to existing established industrial areas and business uses in the town centre?</b>				
<p><b>LTC12A</b> Seek to retain existing employment uses in Lewisham town centre.</p>	<p>The preferred option for employment land is a balanced approach which incorporates all options. This will allow for the protection of existing office and employment uses whilst being in line</p>	<p>LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE</p> <p>In general, the Council will seek to retain existing employment uses in the town centre (uses falling within the category of Use Class B). However, In recognition of the opportunity to enhance vitality and viability of the town centre, the Council will consider redevelopment or conversion of the following employment sites for a mix of uses, including residential. <b>It is envisaged that redevelopment proposals will enable the intensification of sites</b></p>	<p>Retained with minor amendment</p>	<p>Important to keep this policy with minor amendments to reflect a more proactive statement of support for employment uses.</p> <p>Core Strategy Policy 2 identifies Molesworth Street as a Local</p>
<p><b>LTC12B</b> Seek to release land from specific employment allocations in order to</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>promote redevelopment and seek to make the best use of land through mixed use schemes.</p>	<p>with government guidance and promoting the best use of land.</p>	<p><b>and as such there is an opportunity to re-provide employment floorspace as part of a wider mix of uses, including residential. Employment sites which will be considered for redevelopment include the following:</b></p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p><b>LTC12C</b> Seek to protect existing office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.</p>		<p>(a) Former Beatties building (offices over ground floor retail); (b) Engate Street; (c) Thurston Road and Jerrard Street; (d) Conington Road; and (e) Citibank Tower.</p>		<p>Employment Location</p> <p>Core Strategy Policy 3 seeks to protect Local Employment Locations</p>
<p><b>LTC12D</b> Seek to encourage the conversion of town centre accommodation to residential use.</p>		<p>The conversion of other existing employment sites to a mix of uses including residential may be considered acceptable where:</p> <p>(a) the building has been vacant for at least <del>48 months</del> <b>2 years</b> and appropriately marketed for that length of time, and evidence is provided to this effect; and (b) the scheme will considerably assist in meeting other regeneration objectives such as:</p> <p>- improvement to the vitality and viability of the town centre;</p>		<p>Core Strategy Policy 5(2) seeks to retain employment land in town centres which could contribute to a cluster of commercial and business uses</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>- meeting the Borough's housing priority needs; and/or</p> <p>- the provision of community and leisure facilities within an accessible and socially inclusive location.</p> <p><b>(c) The design is capable of longer term adaptation.</b></p> <p>LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE</p> <p>Lewisham Town Centre is the preferred location for large scale office development in the Borough and the Council will seek to promote new office development where appropriate. <b>The Council will resist the loss of office space in the town centre with reference to the criteria identified in LTC EMP1. Where redevelopment entails the loss of office uses, proposals will be encouraged to re-provide this office space in a modern format.</b></p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p>Retained with minor amendment</p>	<p>LP = Draft London Plan</p> <p>CS = Emerging Core Strategy</p>
<b>Open Space</b>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<b>LTC13: How should the AAP process seek to address open space provision within Lewisham town centre?</b>				
<b>LTC13A</b> Retain existing open space provision.	All options are seen to have a role to play in ensuring the provision of high quality open space in Lewisham town centre and the preferred option is therefore a combination of these options.	<p><b>LTC OS1 – RETENTION OF METROPOLITAN OPEN LAND</b></p> <p>In general, the open character of Metropolitan Open Land (MOL) will be protected. In exceptional circumstances such as those relating to Lewisham Gateway, the Council will consider the re-provision of and alteration to the boundary of MOL where the regenerative benefits arising will make a significant positive contribution to the quality of MOL and the vitality of Lewisham town centre in the context of its sub-regional status in the town centre network and the aspiration to attain Metropolitan status.</p>	Omitted	LP and CS12 provide satisfactory general policy context.
<b>LTC13B</b> Improve the quality of open space provision.				
<b>LTC13D</b> Ensure new development provides essential amenity space in high density developments.		<p><b>LTC OS2 – WATERLINK WAY AND CELEBRATING THE RIVER CONFLUENCE</b></p> <p>The Council will seek to safeguard Waterlink Way, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency.</p>	Omitted	Repetition of Core Strategy Policy 12)
		<p>The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue</p>		

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>linking Conington Road Area to the new Confluence Park as shown in Figure 15.</p> <p><b>LTC OS3 – ENHANCING OPEN SPACE AND BIODIVERSITY</b>  The Council will seek to protect and enhance the quality, biodiversity and accessibility of existing and new open space provision in Lewisham Town Centre including those which form part of the Waterlink Way. In addition to formal open spaces, the Council also promotes the value of green and brown roofs and ‘wildspace’ projects in providing amenity and enhancing biodiversity.</p> <p>There would be limited opportunity to increase open space provision in the town centre area, however the Albion Street surface car park has been identified as a suitable site for a new open space, provided parking spaces can be appropriately relocated elsewhere in the town centre.</p> <p><b>LTC OS4 – NATURE CONSERVATION</b>  Development on or within the Sites of Nature Conservation Importance will not be permitted if it is likely to destroy, damage or adversely affect the protected environment</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p><b>Omitted</b></p> <p><b>Omitted</b></p>	<p>LP = Draft London Plan  CS = Emerging Core Strategy</p> <p>Repetition of CS7 and CS12.</p> <p>Repetition of national policy</p>
<b>Transport</b>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<b>ISSUE LTC14: Should parking standards for new development be reviewed?</b>				
<b>LTC14A</b> Retain existing standards for new development including retail development.	The preferred option for LTC14 is option B; to adopt London Plan standards for new development, including new retail development.	<b>LTC TRS1 – LEWISHAM TOWN CENTRE PARKING STANDARDS</b>  The Council will seek to enhance the attractiveness of Lewisham Town Centre and reduce congestion in the area. New development should not exceed the maximum parking standards as set out in Table 3.2 and should seek to minimise parking where possible, taking account of:  (a) the level of public transport accessibility in the town centre; (b) the aspiration to enhance sustainability in the town centre; and (c) pedestrian and cycle access.  Council will encourage multi-use parking including public use of private commercial car parking spaces.  New development should seek to make provision for high standards of accessibility, storage and changing facilities for cyclists and pedestrians, including those with disabilities, in the town centre. The Council will require development to make provision for cycle parking in accordance with the standards set out in Table 3.2.	<b>Omitted</b>	London Plan and LDF standards / policies apply
<b>LTC14B</b> Adopt London Plan standards for new development including retail development.				
<b>LTC14C</b> Apply a more stringent approach than the standards set out in the London Plan.				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
			<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	LP = Draft London Plan CS = Emerging Core Strategy
<b>ISSUE LTC15: In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?</b>				
<b>LTC15A</b> Rationalise existing provision to encourage the use of public transport.	Notwithstanding the response received from the GLA, the preferred option is that the existing levels of public parking in Lewisham town centre should be retained in line with option LTC15B. The option does have a degree of flexibility, and the draft policy interprets the retention of parking levels with respect to maintaining the proportion of parking in relation to the expansion of retail floorspace, which is in conformity with PPS6.	<b>LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE</b> The Council will seek to retain the quantum of existing public /shopper parking spaces in the town centre as a minimum level. The Council will, <b>where possible</b> , also seek to broadly maintain the existing ratio of parking spaces to retail floorspace through a moderate increase in provision in line with an expansion in retail floorspace. The development of the following opportunity areas and sites will involve a significant amount of new retail floorspace and <b>all existing and any</b> new associated parking spaces should be publicly accessible.  (a) Hartwell Ford site <del>(b) Engate Street site</del> (b) Conington Road Opportunity Area (c) Loampit Vale Opportunity Area <b>(d) Ladywell leisure Centre</b>	<b>Retained with amendment</b>	Need a proactive and coordinated strategy in the context of the expansion of retail floorspace
<b>LTC15B</b> Seek to retain existing levels of public parking.				
<b>LTC15C</b> Seek to increase provision of public parking.				
<b>OTHER POLICIES</b>	LTC TRS3 – CYCLING AND WALKING ROUTES	Opportunities to enhance routes such as Waterlink Way, and to connect other parts of the town centre into the cycling and pedestrian network should	No change	Town centre specific statements required

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>be maximised.</p> <p>LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS</p> <p>The Council will support measures to improve the visual and pedestrian experience of the town centre, including at the following locations:</p> <p>(a) Northern roundabout;  (b) Loampit Vale;  (c) Lee High Road and Belmont Hill;  (d) Lewisham High Street;  (e) Molesworth Street; <del>and</del>  (f) Southern roundabout <b>and</b>;  <b>(g) the junctions at Ladywell Road/Lewisham High Street/Courthill Road</b></p> <p>LTC TRS5 – TRAVEL PLANS</p> <p>Developments that will have a significant transport impact (reaching or exceeding the thresholds set out in Table 3.3) will be required to submit a travel plan in order to reduce the impact of travel and transport on the environment. The Council will support car sharing and car club schemes and provision for alternative modes of transport to and any other schemes which challenge the use of private vehicles throughout the life of the proposed development. All other development proposals below the thresholds identified in Table 3 should be accompanied by a suitable commitment to encourage sustainable travel and the provision of sustainable travel information such as installing cycle parking, making public transport information available and promoting travel choices to staff members.</p>	<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p>Retained with amendment</p> <p>Omitted</p>	<p>LP = Draft London Plan  CS = Emerging Core Strategy</p> <p>Town centre specific statements required</p> <p>Repeats London Plan policy 6.3</p>



Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
			<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	LP = Draft London Plan CS = Emerging Core Strategy
<b>Environment</b>				
<b>ISSUE LTC16: How can the AAP seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne?</b>				
<b>LTC16A</b> New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.	The preferred option for issue LTC16 is option A. New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.	<b>LTC ENV1 – PROTECT AND ENHANCE THE ENVIRONS OF THE RIVERS</b> The Council will seek to protect and enhance the environs of the River Quaggy and the River Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the de-culverting of rivers and programmes of naturalisation of riparian environments.	<b>Omitted</b>	Repetition of CSP11 – incorporated within redrafted LTC URB7
<b>LTC16B</b> On the basis that there is no demonstrable harm to the river and its environment, contributions should not be sought.				
<b>OTHER POLICIES</b>	<b>LTC ENV2 - FLOOD PLAINS</b> Development on the floodplain will not normally be permitted unless it can be demonstrated that the proposal would not, itself or cumulatively with other development:		<b>Omitted</b>	Repetition of CSP10



Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>(c) Provide the scope for the provision of shared community facilities of wider public benefit; and (d) Be a high quality, well designed, modern and energy efficient facility.</p> <p>LTC COM3 – RANGE OF COMMUNITY, LEISURE AND ENTERTAINMENT SPACES In order to contribute to town centre vitality, the Council is supportive of the provision of a flexible community spaces along with a range of leisure and entertainment uses in Lewisham Town Centre. In particular, the Council will be supportive of proposals for a cinema in the town centre, and a site at the northern end of the centre, such as the Lewisham Gateway site, is considered to be an appropriate location. <b>The AAP is proactive in identifying opportunities for additional community and leisure facilities as follows:</b></p> <ul style="list-style-type: none"> <li>• <b>Refurbishment of the Playtower building on Ladywell Road into a multi-use community asset</b></li> <li>• <b>Potential for further enhancement of the Leamore Resource Centre on Lee High Road.</b></li> </ul> <p><b>The Loampit Vale Leisure Centre will provide a significant improvement in the provision of indoor sports and leisure facilities in the town centre, enabling the development of the Ladywell Leisure Centre site for other uses.</b> The redevelopment of existing community, leisure and entertainment spaces will only be permitted if it can be demonstrated that:</p> <p>(a) the facility is no longer needed or an equivalent facility can be replaced at an alternative site with an equal or improved level of accessibility; (b) the locational requirements for the facility are not met; (c) the facilities need updating which cannot be achieved at a reasonable cost; and/or (d) alternative provision of equivalent benefit to the community is made.</p> <p><b>Opportunities also need to be maximised for the provision of enhanced/additional leisure and sports facilities in and around the town centre.</b></p>			<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul> <p><b>Retained with amendment</b></p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>A relevant extension of policies of vitality and viability which is town centre specific</p> <p>This is a Borough-wide LDF issue, not town centre specific.</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
			<ul style="list-style-type: none"> <li>• No change</li> <li>• Omitted</li> <li>• Retained with amendment</li> <li>• New policy</li> </ul>	LP = Draft London Plan CS = Emerging Core Strategy
<p>LTC COM4 - MAJOR DEVELOPMENTS</p> <p>The Council may require major developments to prepare a social impact report to assess the health, education, leisure and community facility and infrastructure needs arising from a proposal.</p>			Omitted	
<b>Implementation – No ‘issues’, just draft policies</b>				
<p>LTC IMP1 – MONITORING</p> <p>The Council will facilitate the monitoring of the AAP through the following interventions:</p> <p>(a) Adherence to PPS64 recommendations for town centre healthcheck monitoring;</p> <p><del>(b) Liaison with the Town Centre Manager; and</del></p> <p>(b) Monitoring progress on planning applications.</p> <p><b>(c) Reporting progress on infrastructure delivery to the Asset Management Board and Sustainable Development Partnership; and.</b></p> <p><b>(d) The inclusion of a town centre specific section in the Annual Monitoring Report (AMR)</b></p> <p>The full monitoring framework including indicators, targets, trends and indicator sources, can be viewed in Appendix 4.</p> <p>LTC IMP 2 – COMPULSORY PURCHASE ORDER POWERS</p> <p>Where necessary, the Council will use Compulsory Purchase Order (CPO) powers to deliver agreed strategies in line with policies and site allocations of the Lewisham Town Centre Area Action Plan.</p>			<p>Retained with amendment</p> <p>Omitted</p>	<p>Continues to be a priority for the AAP</p> <p>Specific implementation options considered and reviewed as part of a new issue (issue 19)</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p><b>LTC IMP3 – LEWISHAM TOWN CENTRE S106 POOLING AND PRIORITIES</b></p> <p>The Council will seek to facilitate the pooling of developer contributions to achieve a comprehensive and holistic approach to the regeneration of the town centre. In discussion with developers, the Council will expect contributions from new development to assist in achieving the following interventions:</p> <ul style="list-style-type: none"> <li>(a) public realm enhancements;</li> <li>(b) contributions to achieve comprehensive improvements in Opportunity Areas;</li> <li>(c) shopfront improvement grants;</li> <li>(d) appropriate town centre management initiatives;</li> <li>(e) community development projects including engagement exercises;</li> <li>(f) improvements to the Rivers and their environs, including naturalisation and ecological quality;</li> <li>(g) implementation of Waterlink Way;</li> <li>(h) funding of town centre community, health and leisure facilities and infrastructure needs resulting from major development;</li> <li>(i) employment and training support;</li> <li>(j) air quality management measures;</li> <li>(k) traffic management measures, including pedestrian routes and facilities; and/or</li> <li>(l) public transport improvements.</li> </ul> <p><b>LTC IMP4 - PARTNERSHIP AND CONSULTATION</b></p> <p>In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the Statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites.</p>			<p>• No change</p> <p>• Omitted</p> <p>• Retained with amendment</p> <p>• New policy</p> <p><b>Omitted</b></p> <p><b>Omitted</b></p>	<p>LP = Draft London Plan</p> <p>CS = Emerging Core Strategy</p> <p>Specific implementation options considered and reviewed as part of a new issue (issue 19)</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p><b>LTC IMP5 – INFRASTRUCTURE AND SERVICES</b>  Development in Lewisham Town Centre will be required to contribute to the upgrading of utilities as necessary to support the development. Local improvements may be required to gas, electricity, water, telecommunications supplies and foul and surface water sewerage.</p> <p><b>LTC IMP6 - TRANSPORT CAPACITY</b>  Where development proposals will have a significant impact on highway or public transport networks, contributions may be sought in relation to:</p> <p>(a) increased line or station capacity on DLR and rail lines;  (b) improved operating environment and facilities for buses;  (c) enhanced pedestrian and cycle connections, particularly between development areas and the public transport interchange.</p> <p><b>LTC IMP7 – EDUCATION AND TRAINING SCHEMES</b>  Major development should contribute to education and training by incorporating schemes as part of their construction and ongoing operations. This may involve one or more of the following:</p> <p>(a) Employment opportunities and training schemes for local people in construction related industries associated with development;  (b) Employment of local people in the ongoing enterprise; and/or  (c) The development of training programme (from small scale work experience type activities through to formal educational programmes) associated with on-going enterprise.</p>			<p>Omitted</p> <p>Omitted</p> <p>Omitted</p>	<p>LP = Draft London Plan  CS = Emerging Core Strategy</p>
<p><b>New options, preferred options and policies</b> (see main report for detailed overview)</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> <li>No change</li> <li>Omitted</li> <li>Retained with amendment</li> <li>New policy</li> </ul>	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p><b>Issue 17: What opportunities are there for CO2 emission reduction in Lewisham Town Centre/ What role if any, should DE play in minimising CO2 emissions in Lewisham Town Centre? Is DE realistic and if so what options are there for delivering it?</b></p> <p><b>Options:</b>  <b>17A:</b> Solar thermal (ST);  <b>17B:</b> Photovoltaics (PV );  <b>17C:</b> Wind turbines;;  <b>17D:</b> Gas-fired CHP;  <b>17E:</b> Biomass or bio-fuel fired CHP;  <b>17F:</b> Air source heat pumps (ASHP);  <b>17G:</b> Ground source heat pumps (GSHP); and  <b>17H:</b> Decentralised energy  <b>Preferred option:</b>  Composite – 17A, 17B, 17D and 17H</p> <p><b>New Policy 1: Carbon Dioxide Emission Reduction in Lewisham Town Centre</b></p>			New policy	Town centre specific policy required to consider impact of evolving national framework alongside regional and local priorities
<p><b>Issue 18: What social infrastructure is required to support the projected growth in the town centre during the plan period?</b></p> <p><b>Options:</b>  <b>18A:</b> Increase primary school capacity  <b>18B:</b> Increase secondary school capacity  <b>18C:</b> Specific childcare approach</p>			New policy	Town centre specific policy required through updated options process

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
			<ul style="list-style-type: none"> <li>No change</li> <li>Omitted</li> <li>Retained with amendment</li> <li>New policy</li> </ul>	LP = Draft London Plan CS = Emerging Core Strategy
<b>18D:</b> Increase primary health care provision  <b>Preferred option:</b> Composite of all options  <b>New Policy 2: Social infrastructure</b>				
<b>Issue 19: What approach should the AAP take to delivery and implementation?</b>  <b>Options:</b> <b>19A:</b> Rely on Borough-wide approach <b>19B:</b> Define bespoke town centre implementation strategy  <b>Preferred option:</b> Hybrid of 19A and 19B  <b>New Policy 3: Implementation</b>			New policy	Refreshed approach to implementation which consolidates the emerging approach for the town centre.

**Table 3: Preferred Options - Site-specific Policy Development**

Preferred Option		Comments	Proposed changes
Policy Reference	Policy Title		
LTC OPP0	Opportunity Area Policies	Not required – dealt with by Core Strategy	Omitted

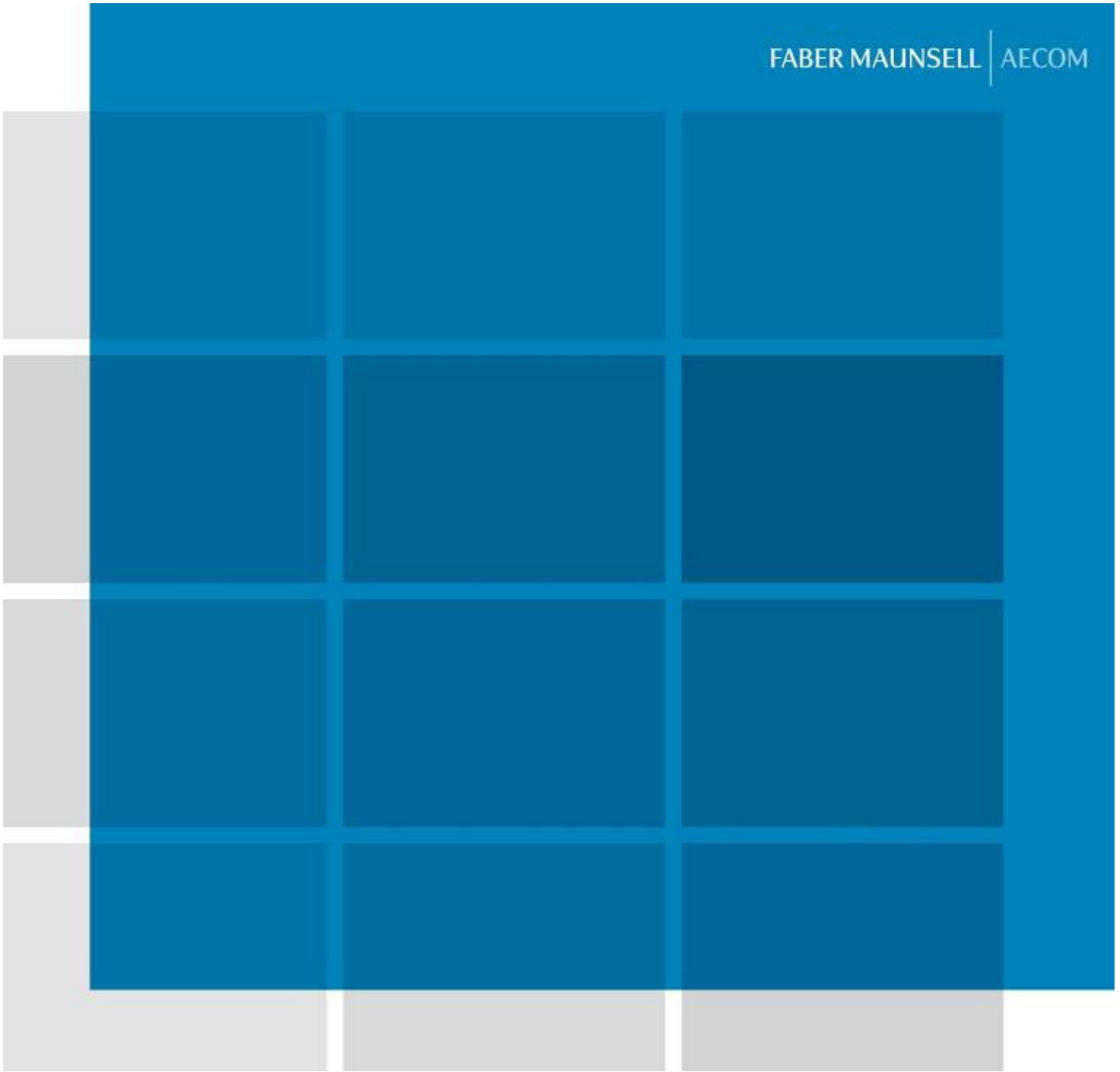


Preferred Option		Comments	Proposed changes
Policy Reference	Policy Title		
<b>LEWISHAM GATEWAY</b>			
LTC OPP1	Lewisham Gateway Opportunity Area	Not required – dealt with by Core Strategy	Omitted
LTC OPP1a	General principles for Lewisham Gateway	Not required – dealt with by Core Strategy	Omitted
SITE SPECIFIC POLICY 1.1	Kings Hall Mews	New site – sensitive location adjacent to Gateway scheme	New policy
<b>LEWISHAM CENTRE</b>			
LTC OPP2	Lewisham Centre and adjoining land	Different geographical coverage and scope of proposals	Retained with amendment as Character area policy6
LTC OPP2a	Entrance and routes	Shopping centre unlikely to come forward for redevelopment	Omitted
LTC OPP2b	Urban form	Shopping centre unlikely to come forward for redevelopment	Omitted
LTC OPPc	Public realm	Scale of changes unlikely to take place	Omitted
LTC OPPd	Vehicular servicing and parking	Shopping centre unlikely to come forward for redevelopment	Omitted
LTC OPP2e	Molesworth Street frontage	Considered unlikely to be implemented	Omitted
LTC OPP2f	Land south of the shopping centre	Still relevant	Retain but with amendments as Site-Specific Policy 6.2
LTC OPP2g	Land north of the shopping centre	Still relevant	Retain but with amendments as Site-Specific Policy 6.1
LTC OPP2h	Molesworth Street surface car park site	Site retained as car parking	Omitted
LTC OPP2i	Citibank Tower	Aspirations still apply	No change (now, Site Specific Policy 6.4)
LTC OPP2j	Lewisham High Street and	Not required. Points are covered in other policies	Omitted

Preferred Option		Comments	Proposed changes
Policy Reference	Policy Title		
	market		
LEE HIGH ROAD			
LTC OPP3	Lee High Road	Largely still appropriate	Retained with amendment as Character area policy 4
LTC OPP 3a	Lee High Road western end	Largely still appropriate notwithstanding planning permissions granted recently	Retain but with amendments as Site-Specific Policy 4.1
LTC OPP3b	Lee High Road eastern end	Scheme built	Omitted
LTC OPP3c	Clarendon Green	Retention of Clarendon Rise car park	Omitted
LOAMPIT VALE			
LTC OPP4	Loampit Vale	Given progress on many sites this policy is now in need of review	Retained with amendment as Character area policy 2
LTC OPP4a	Loampit Vale South – a mixed use urban street	On site	Omitted
LTC OPP4b	East side of Elmira Street	On site	Omitted
LTC OPP4c	West of Elmira Street	On site	Omitted
LTC OPP4d	Thurston Road opportunity	Replaced by sub-area wide policy	Omitted
LTC OPP4e	Land west of Jerrard Street	Review and note that consent already granted	Retain but with amendments as Site-Specific Policy 2.2
LTC OPP4f	Land east of Jerrard Street	Review	Retain but with amendments as Site-Specific Policy 2.1
LTC OPP4g	Railway strip	Retain policy	Retain but with amendments as Site-Specific Policy 2.3
CONNINGTON ROAD			
LTC OPP5	Connington Road		Retained with amendment as

Preferred Option		Comments	Proposed changes
Policy Reference	Policy Title		
			Character area policy 3
LTC OPP5a	Northern Link		Omitted
LTC OPP5b	Tesco block	Still largely relevant although subject to change following discussions with Tesco and recent design work	Retain but with amendments as Site-Specific Policy 3.1
LTC OPP5c	Car park and petrol station		Omitted – incorporated in site specific policy 3.1
ENGATE STREET			
LTC OPP6	Engate Street	No longer considered appropriate	Omitted
LTC OPP6a	Engate Street mixed use block	No longer considered appropriate	Omitted
LADYWELL ROAD			
Character area policy 5	Ladywell Road character area	New character area to respond to evolving site context	New policy
Site Specific Policy 5.1	Ladywell Leisure Centre Site	New site subject to options testing and development	New policy

## **Appendix B - Sustainability Appraisal AAP Preferred Options Report 2007**



**SUSTAINABILITY APPRAISAL**  
LEWISHAM TOWN CENTRE AREA ACTION PLAN

The London Borough of Lewisham  
April 2007

Prepared by: .....  
Electra Stratigaki  
Consultant

Approved by: .....  
Dave Cheshire  
Regional Director

Rev No	Comments	Date
1	Draft Sustainability Report	11/04/07
2	Final Sustainability Report	18/04/07

The Johnson Building, 77 Hatton Garden, London, EC1N 8JS  
Telephone: 020 7601 1659 Fax: 020 7645 2099 Website: <http://www.fabermaunsell.com>

Job No 40630ELNE

This contains confidential and commercially sensitive information, which shall not be disclosed to third parties.

# Executive Summary

This report sets out the Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Preferred Options report. Sustainability Appraisal of Development Plan Documents is a requirement of the 2004 Planning and Compulsory Purchase Act.

**Lewisham Town Centre** is in a dynamic and strategic location in southeast London. The town centre is especially well connected to central London by rail and DLR and has developed as an important retail and service centre, centred on the historic street market, and the Riverdale Shopping Centre.

The following **key area objectives for the plan** have been proposed, as follows:

- **Theme 1 – Housing:** To make a significant contribution to the provision of high quality housing in the heart of Lewisham town centre, of a range of unit size, mix and tenure type; and, in line with the Core (Spatial) Strategy, to meet housing need, deliver an appropriate level of affordable housing, and implement sustainable patterns of housing development with highest densities focused at highly accessible public transport interchanges.
- **Theme 2 – Retail and town centre status:** To support and improve the vitality and viability of Lewisham town centre, with a view to achieving Metropolitan status.
- **Theme 3 – Urban Design:** To promote sustainable construction and a design-led approach to new development in Lewisham Town Centre, whilst protecting and enhancing existing historic assets.
- **Theme 4 – Employment:** To support an appropriate supply of employment generating uses and sites within the town centre and to promote mixed use development.
- **Theme 5 – Open space/recreation:** To maintain, protect and improve the supply of open space within the town centre, and to incorporate recreational and open space within new developments.
- **Theme 6 – Transport:** To encourage more sustainable patterns of transport development, reduce the need for private car travel and provide high levels of accessibility in Lewisham Town Centre.
- **Theme 7 – Environment:** To protect and enhance nature conservation and biodiversity of the Town Centre and support the principle of environmentally sustainable development at the local scale.
- **Theme 8 – Leisure and community:** To support Lewisham Town Centre in becoming a more accessible and socially inclusive place with adequate provision of community and leisure facilities.
- **Theme 9 – Implementing and monitoring the AAP:** To develop an AAP which responds to local and strategic context.

Consultants Urban Practitioners were appointed to prepare the Lewisham Town Centre Area Action Plan. The Sustainable Development Group of consultants Faber Maunsell was appointed to undertake a Sustainability Appraisal and the exercise began in February 2005.

The Communities and Local Government (CLG) summarises **the aim of Sustainability Appraisal** as follows:

*“The purpose of sustainability appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation*

*of...new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).<sup>1</sup>*

In terms of a **definition of sustainable development**, Securing the Future<sup>2</sup>, the government's new sustainable development strategy for the UK, states that sustainable development:

*“aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations”.*

**The UK sustainable development strategy** is based on five principles – the first three are particularly relevant at the local level in the UK. These five principles help to define and understand the sustainability agenda:

- Living Within Environmental Limits;
- Ensuring a Strong, Healthy and Just Society;
- Achieving a Sustainable Economy;
- Promoting Good Governance;
- Using Sound Science Responsibly.

The **Sustainability Appraisal of the Lewisham Town Centre Area Action Plan** aims to ensure that as far as possible the plan contributes to sustainable development locally and globally.

The **first phase of the Sustainability Appraisal** was to gather information and to establish the key sustainability issues for the Lewisham Town Centre Area, while also reflecting broader concerns and priorities (e.g. at the regional, national and international level). Consultation to get local views on sustainability issues for Lewisham Town Centre was undertaken by Urban Practitioners as part of wider consultation. The consultation undertaken during the preparation of the Area Action Plan is described in a separate report prepared by Urban Practitioners.

Based on the information gathered in the first phase, a **Sustainability Appraisal Scoping Report was prepared**. The scoping report included:

- The other plans, programmes and objectives relevant to the plan, with information on synergies or inconsistencies;
- Baseline information, either already collected or still needed, with notes on sources and difficulties encountered;
- Social, environmental, and economic issues identified;
- The proposed Sustainability Appraisal Framework, including the sustainability appraisal objectives and indicators (and targets where these are proposed), and an explanation of how they were chosen;
- Proposals for the structure and level of detail of the SA Report.

The scoping report set out the key sustainability issues that should be addressed during the preparation and implementation of the Lewisham Town Centre Area Action Plan and showed how these issues were determined. **The key sustainability issues for Lewisham Town Centre** are summarised in Section 4.3 of this report.

The findings regarding the key sustainability issues for Lewisham Town Centre, as presented in the Scoping Report, were fed into the plan preparation process.

The Scoping Report also proposed a framework for the ongoing sustainability appraisal. The **Sustainability Appraisal Framework** is based on a set of sustainability objectives, most of which have associated indicators. The purpose of the indicators is to allow the council and stakeholders to judge over time whether progress is being made towards meeting the objectives. For some objectives there are also relevant targets. Usually achieving an objective at Lewisham Town Centre will not be enough in itself to ensure that a related target is met, but

<sup>1</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development. CLG (formerly ODPM). November 2005 [www.communities.gov.uk/index.asp?id=1161341](http://www.communities.gov.uk/index.asp?id=1161341)

<sup>2</sup> Securing the Future – delivering UK sustainable development strategy. The Stationery Office Cm 6467. March 2005 [www.sustainable-development.gov.uk](http://www.sustainable-development.gov.uk)



successfully addressing sustainability issues at Lewisham Town Centre can contribute to addressing Lewisham's sustainability issues and meeting local, regional and national targets.

A **consultation process on the Sustainability Appraisal Scoping Report** was also undertaken. The report was sent to four statutory consultation bodies and local organisations for comment. The responses were reviewed and taken into account where possible. As a result there have been some changes to the sustainability objectives and the Sustainability Appraisal Framework.

The **sustainability objectives** used for the appraisal set out in this report are as follows:

Ref	Topic	Sustainability Appraisal Objectives
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport
Soc2	Decent homes	To increase the provision of housing that meets decent homes standards
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities
Soc5	Heritage	To protect and enhance heritage buildings
Soc6	Culture	To protect and enhance cultural diversity
Soc7	Crime	To reduce crime levels in the town centre
Soc8	Education	To increase access to lifelong learning
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.
Soc10	Road safety	To improve pedestrian safety in the town centre
Soc11	Health	To improve inclusive access to local healthcare facilities
Soc12	Noise	To reduce noise from road traffic, construction and industry
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces
Env1	Flood Risk	To manage the risk of flooding (including climate change) and reduce its effects.
Env2	Sustainable transport	To reduce dependency on private cars
Env3	Renewable energy	To increase on-site renewable energy provision
Env4	Energy efficiency	To increase the energy efficiency performance of existing buildings
Env5	Waste and recycling	To increase the amount of waste recycling
Env6	Water use	To provide sustainable sources of water
Env7	Air quality	To improve air quality
Env8	Biodiversity	To value, protect and enhance biodiversity
Env9	Water environment	To protect, manage and enhance the Rivers and associated habitats
Eco1	Retail offer	To increase the diversity of the retail offer
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy
Eco3	Local business	To increase density of local business
Eco4	Employment opportunities	To increase access to local employment

The **compatibility of AAP objectives with the sustainability objectives**, as far as possible, was checked as part of the Sustainability Appraisal process and the results of this check can be found in the main report. The sustainability objectives that are the basis of the Sustainability Appraisal Framework are distinct from the Area Action Plan objectives. There are some potential conflicts between plan objectives and sustainability objectives, but these were largely addressed by the draft plan policies in the Preferred Options report.

**The main tasks in the sustainability appraisal** since the publication of the scoping report have been to feed into the plan preparation process the results of assessments of the relative effects of the policy options considered and then to assess the effects of the plan policies once a preferred option was selected. The assessment of options is included in the main report and the results of the sustainability appraisal of the preferred options are summarised in the table at the end of this summary.

The draft **Area Action Plan sets out 48 draft policies**, (and 31 site specific sub-policies) which are shown in full in the main report.

**Significant negative effects of the plan policies** have been predicted in relation to:

- Noise pollution; and
- Waste minimisation

And other negative effects of the plan policies have been predicted in relation to:

- Water use,
- Air Quality, and
- Employment.

The main report explains why these significant effects have been predicted and proposes the following mitigation measures:

Ref	Topic	Mitigation / Comments
Soc12	Noise	<p>The impacts of increased noise can be limited (by controlling when noise and vibration occur, for how long and at what levels) but not entirely eliminated. Unnecessary noise and vibration can be prevented by strict enforcement.</p> <p>Proposals:</p> <ul style="list-style-type: none"> <li>• Current noise levels should be surveyed to establish the current situation. Noise levels should be monitored adjacent to sensitive sites (e.g. dwellings and offices) during development works.</li> <li>• Developers should be asked at the planning stage to draw up a plan for mitigating noise impacts on sensitive sites including, for example: routing construction traffic away from sensitive sites; agreeing neighbourly site working schedules; noise monitoring during works; careful choice of plant to minimise noise on site; choice of lower noise construction techniques (e.g. for piling); plans for liaising with local stakeholders and responding to complaints.</li> <li>• The timing of different works, including works outside the plan area should be considered when assessing potential noise and disruption and planning mitigation.</li> </ul>
Env5	Waste and recycling	<p>There would be short to medium-term impacts from construction activities that would have to be minimised through the implementation of Construction Site Management Plans.</p>
Env6	Water use	<p>New development will inevitably lead to an increase in water use. Water efficiency can be achieved through the implementation of appropriate measures in developments.</p>

Ref	Topic	Mitigation / Comments
Env7	Air quality	There will be short to medium term impacts from construction activities, but measures to promote sustainable transport and the creation of additional open spaces should be beneficial in the long term
Eco4	Employment opportunities	There will be positive effects in the short to medium term with employment generated from the construction industry. The long term effects will depend on the type of retail and commercial uses to be developed.

Overall the sustainability appraisal process has served to clarify the key sustainability issues and to outline the wider sustainability agenda. Some issues which are pressing locally and nationally – e.g. waste arising from homes and businesses – are difficult to address directly in terms of spatial policies in the Area Action Plan. The Sustainability Appraisal process will ensure that the effects of the plan on such issues are monitored. The inclusion of appropriate sustainability objectives in terms of “development principles” for Lewisham Town Centre will ensure that these issues are on the planning agenda during implementation of the plan.

**Following the publication of this Sustainability Appraisal Report**, the Sustainability Appraisal will continue to inform and develop in step with production of the Area Action Plan as follows:

- Consultation on the Sustainability Appraisal Report (coinciding with consultation on the draft Area Action Plan);
- Monitoring and Review.

The table on the following page shows a summary of the assessment of the effects of the plan policies against the sustainability objectives.

Assessment of the Impacts of the Preferred Policies in the Area Action Plan												
ASO	Sustainability Objective	Short Term	Long Term	Housing	Shopping & Town Centre	Urban Design	Employment	Open Space	Transport	Environment	Community & Leisure	Implementation
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	YY	YY	yy	y	?	?	-	-	-	-	-
Soc2	To increase the provision of housing that meets decent homes standards	YY	YY	yy	y	y	y	-	-	-	-	-
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	YY	YY	-	y	yy	-	yy	y	yy	-	yy
Soc4	To increase the provision of accessible and inclusive everyday facilities	Y	Y	-	y	y	y	y	y	y	yy	yy
Soc5	To protect and enhance heritage buildings	N	N	n	n	y	n	-	-	-	-	-
Soc6	To protect and enhance cultural diversity	?	?	y	-	?	-	-	-	-	y	?
Soc7	To reduce crime levels in the town centre	YY	YY	y	yy	yy	-	?	-	-	-	-
Soc8	To increase access to lifelong learning	Y	?	-	-	?	?	-	-	-	yy	y
Soc9	To improve access to amenities for vulnerable members of the community.	?	?	?	-	?	-	-	y	-	?	?
Soc10	To improve pedestrian safety in the town centre	Y	Y	y	-	y	-	-	y	-	?	y
Soc11	To improve inclusive access to local healthcare facilities	?	?	?	?	?	?	-	-	-	y	y
Soc12	To reduce noise from road traffic, construction and industry	NN	N	n	n	n	n	-	n	-	?	?
Soc13	To increase the quality and provision of publically accessible open spaces	YY	YY	y	y	y	-	yy	-	yy	-	y
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	Y	Y	-	n	y	-	y	-	yy	-	-
Env2	To reduce dependency on private cars	Y	Y	y	?	y	-	-	yy	-	y	y
Env3	To increase on-site renewable energy provision	?	?	?	?	?	?	-	-	-	?	?
Env4	To increase the energy efficiency performance of existing buildings	Y	?	?	y	?	y	-	-	-	?	?
Env5	To increase the amount of waste recycling	N	?	n	n	y	n	-	-	-	n	n
Env6	To provide sustainable sources of water	N	?	n	n	y	n	-	-	-	n	n
Env7	To improve air quality	N	?	n	n	y	?	y	y	y	?	?
Env8	To value, protect and enhance biodiversity	Y	Y	-	-	y	-	y	-	yy	-	-
Env9	To protect, manage and enhance the Rivers and associated habitats	YY	YY	-	n	y	-	yy	y	yy	-	-
Eco1	To increase the diversity of the retail offer	YY	YY	y	yy	y	y	-	y	-	y	-
Eco2	To encourage a vibrant, well-managed evening economy	Y	YY	-	yy	-	-	-	-	-	y	-
Eco3	To increase density of local business	Y	YY	y	yy	y	?	-	-	-	y	-
Eco4	To increase access to local employment	Y	?	y	y	y	nn	-	-	-	y	y

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

# Sustainability Appraisal - Lewisham AAP

# Table of Contents

<b>1</b>	<b>Lewisham Town Centre Area Action Plan and the Sustainability Appraisal Report</b> .....	<b>2</b>
1.1	Introduction to Lewisham.....	2
1.2	The Area Action Plan and Local Development Framework.....	2
1.3	Sustainability Appraisal of the Lewisham Town Centre Area Action Plan.....	2
<b>2</b>	<b>Background to Sustainability Appraisal</b> .....	<b>4</b>
2.1	Sustainability Appraisal and the SEA Directive .....	4
2.2	The Sustainability Appraisal Methodology.....	5
2.3	Consultation during Sustainability Appraisal .....	7
<b>3</b>	<b>Lewisham Town Centre</b> .....	<b>8</b>
3.1	Location .....	8
<b>4</b>	<b>Sustainability Context and Issues for Lewisham Town Centre</b> .....	<b>9</b>
4.1	Baseline Information .....	9
4.2	Relevant Plans, Programmes and Objectives .....	10
4.3	Issues From Consultations and Studies .....	12
4.4	Summary of Key Sustainability Issues for the SA (Task A3).....	12
<b>5</b>	<b>The Sustainability Appraisal Framework</b> .....	<b>13</b>
5.1	Introduction .....	13
5.2	Proposed Sustainability Objectives .....	14
5.3	Proposed Sustainability Appraisal Framework .....	16
<b>6</b>	<b>Plan Options</b> .....	<b>19</b>
<b>7</b>	<b>Plan policies</b> .....	<b>20</b>
7.1	Lewisham Town Centre Draft Policies.....	20
7.2	Compatibility of the Area Action Plan and Sustainability Appraisal objectives...	22
7.3	Assessment of the plan policies .....	24
7.4	Significant negative effects of the plan policies and proposed mitigation measures .....	24
7.5	Secondary, cumulative and synergistic effects.....	24
7.6	Uncertainties and risks .....	25
<b>8</b>	<b>Implementation</b> .....	<b>31</b>
8.1	Relationship with other plans and programmes .....	31
8.2	Proposals for monitoring .....	31
	<b>Annex A: Consultation Responses</b> .....	<b>40</b>
	<b>Annex B: Key Sustainability Issues</b> .....	<b>43</b>
	<b>Annex C: Options Review</b> .....	<b>50</b>
	<b>Annex D: Policy Appraisal</b> .....	<b>58</b>



# 1 Lewisham Town Centre Area Action Plan and the Sustainability Appraisal Report

This report sets out the Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Preferred Options report. Sustainability Appraisal of Development Plan Documents is a requirement of the 2004 Planning and Compulsory Purchase Act.

## 1.1 Introduction to Lewisham

Lewisham is an inner London Borough covering around 14 square miles, located in south east London. It is a vibrant and diverse Borough, home to more than 240,000 people. It is in a dynamic and strategic location and designated as a Major Centre within the London Plan. **Lewisham Town Centre** is especially well connected to central London by rail and DLR and has developed as an important retail and service centre, centred on the historic street market, and the Riverdale Shopping Centre.

## 1.2 The Area Action Plan and Local Development Framework

The preparation of a **Sustainability Appraisal for the draft Lewisham Town Centre Area Action Plan** is part of the process prior to its adoption as a Local Development Document. Area Action Plans, like this one being prepared for Lewisham Town Centre are Development Plan Documents. Development Plan Documents are one of a number of types of Local Development Documents that make up the Local Development Framework. A number of documents and studies set the scene for the preparation of the Area Action Plan.

## 1.3 Sustainability Appraisal of the Lewisham Town Centre Area Action Plan

Faber Maunsell's Sustainable Development Group has been appointed by Lewisham Borough Council to assist them in preparing a Sustainability Appraisal for the Lewisham Town Centre Area Action Plan.

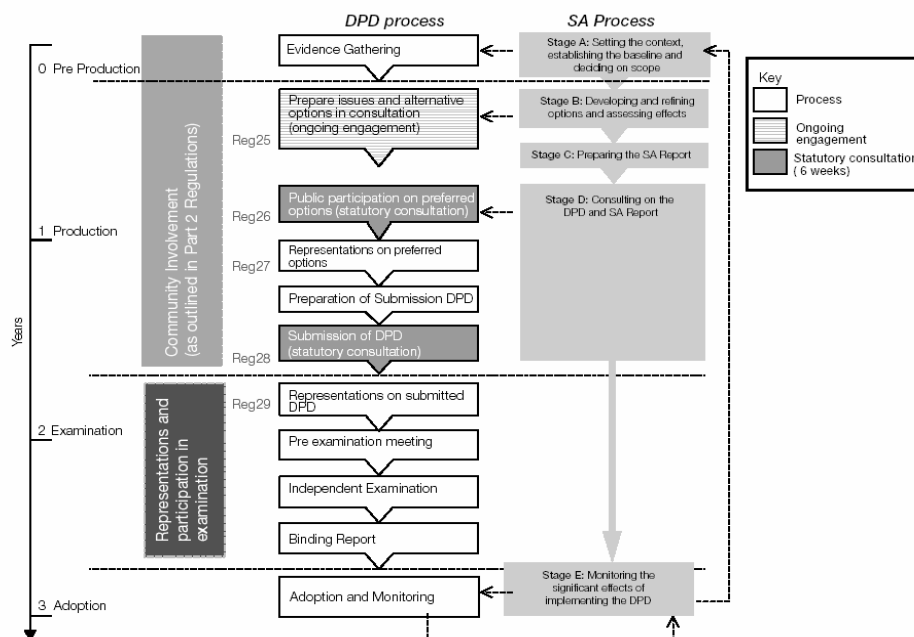


Figure 1: Development Plan Document preparation and associated Sustainability Appraisal process<sup>3</sup>.

<sup>3</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. CLG (formerly ODPM). November 2005 [www.communities.gov.uk/index.asp?id=1161341](http://www.communities.gov.uk/index.asp?id=1161341)



Figure 1 shows the overall process of preparing a Development Planning Document and the associated Sustainability Appraisal process. This Sustainability Appraisal Report corresponds to the result of Stage C of the appraisal process. The Sustainability Appraisal Report includes the following:

- A non-technical summary of the Sustainability Appraisal to support public consultation;
- Details of when the appraisal was carried out, by whom, and who was consulted;
- The plan objectives;
- The other plans, programmes and objectives relevant to the plan;
- Baseline information, already collected or still needed, with notes on sources;
- Social, environmental, and economic issues identified as a result of the work undertaken;
- The SA Framework, including the suggested SA objectives and indicators (and targets where these are proposed), and how they were chosen;
- The strategic options considered and how they were identified;
- Comparison of the social, environmental and economic effects of the options and an explanation of the appraisal methodology;
- How social, environmental and economic issues were considered in choosing the preferred options;
- An assessment of the preferred options against the sustainability appraisal objectives; and
- Proposed mitigation measures.

## 2 Background to Sustainability Appraisal

This section sets out the background to Sustainability Appraisal including the purpose, methodology and steps in the process.

### 2.1 Sustainability Appraisal and the SEA Directive

Sustainability Appraisal of Development Plan Documents is a requirement of the 2004 Planning and Compulsory Purchase Act. The provisions for Sustainability Appraisal in the Act are distinct from the requirements of “Directive 2001/42/EC of the European Parliament and of the Council...on the assessment of the affects of certain plans and programmes on the environment”, known as the SEA (Strategic Environmental Assessment) Directive. The SEA Directive is implemented in UK legislation by the SEA Regulations.

This Sustainability Appraisal is being undertaken with reference to the guidance on Sustainability Appraisal published by the Communities and Local Government (formerly Office of the Deputy Prime Minister). This guidance “is intended to ensure that Sustainability Appraisals meet the requirements of the SEA Directive, and...widens the Directive’s approach to include social and economic as well as environmental issues.”

The Sustainability Appraisal of the Lewisham Town Centre Area Action Plan is intended to meet both the requirement for a Sustainability Appraisal and the requirements of the SEA Directive.

This Sustainability Appraisal was started in February 2005 and the process used has been based on the consultation paper<sup>4</sup> (and the interim advice note<sup>5</sup>) that were available at the time. In November 2005, the CLG published the final version of its guidance. As the appraisal was already in process, this report has been based largely on the consultation paper, rather than the final guidance.

#### 2.1.1 Purpose of Sustainability Appraisal

The Communities and Local Government (CLG) summarises the aim of Sustainability Appraisal as follows:

*“The purpose of sustainability appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of...new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).<sup>6</sup>”*

*[It] should:*

- *Take a long-term view of whether and how the area covered by the plan is expected to develop, taking account of the social, environmental, and economic effects of the proposed plan;*
- *Provide a mechanism for ensuring that sustainability objectives are translated into sustainable planning policies;*
- *Reflect global, national, regional and local concerns;*
- *Provide an audit trail of how the plan has been revised to take into account the findings of the SA;*
- *Form an integral part of all stages of plan preparation, and*
- *Incorporate the requirements of the SEA Directive.’*

<sup>4</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, Consultation Paper, September 2004

<sup>5</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, Interim Advice Note on Frequently Asked Questions, April 2005

<sup>6</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. CLG (formerly ODPM). November 2005 [www.communities.gov.uk/index.asp?id=1161341](http://www.communities.gov.uk/index.asp?id=1161341)

## 2.2 The Sustainability Appraisal Methodology

The CLG guidance referred to above describes Sustainability Appraisal as:

*“an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.”*

### 2.2.1 Previous Steps in the Appraisal

Previous to the publication of this Sustainability Appraisal Report, the following stages of the Sustainability Appraisal process were undertaken:

- Gathering of evidence in the period May to June 2005, including:
  - Review of other plans, programmes and objectives
  - Accessing local knowledge and reviewing the results of previous consultation
  - Gathering baseline data
  - Resulting in the publication in May 2005 of a:
- Sustainability Appraisal Scoping Report.

The Scoping Report indicated that the next step in the Sustainability Appraisal process would be the publication of an Initial Sustainability Appraisal and associated consultation. Since the preparation of the Scoping Report, the Communities and Local Government (formerly Office of the Deputy Prime Minister) published an “Interim advice note” answering Frequently Asked Questions about the Sustainability Appraisal process. The document clarified the guidance previously published by the CLG and indicated that:

*“The concept of an “initial Sustainability Appraisal report” may also imply an early draft of the full Sustainability Appraisal report which is not intended.”*

Consequently an Initial Sustainability Appraisal report has not been prepared for the Lewisham Town Centre AAP. Instead, a commentary on the proposed options was prepared to highlight potential conflict or issues and opportunities to strengthen the deliver of the sustainability objectives. This commentary was included in the Issues and Options report prepared by Urban Practitioners in August 2005.

### 2.2.2 Purpose of the Sustainability Appraisal Report

The Sustainability Appraisal Report sets out the results of tasks B and C (see Figure 2 that take place in parallel with the preparation of the draft Area Action Plan.

DPD Stage 2: Production
SA stages and tasks
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>● <b>B1:</b> Testing the DPD objectives against the SA framework.</li> <li>● <b>B2:</b> Developing the DPD options.</li> <li>● <b>B3:</b> Predicting the effects the DPD.</li> <li>● <b>B4:</b> Evaluating the effects of the DPD.</li> <li>● <b>B5:</b> Considering ways of mitigating adverse effects and maximising beneficial effects.</li> <li>● <b>B6:</b> Proposing measures to monitor the significant effects of implementing the DPDs.</li> </ul>
<p><b>Stage C: Preparing the Sustainability Appraisal Report</b></p> <ul style="list-style-type: none"> <li>● <b>C1:</b> Preparing the SA Report.</li> </ul>
<p><b>Stage D: Consulting on the preferred options of the DPD and SA Report</b></p> <ul style="list-style-type: none"> <li>● <b>D1:</b> Public participation on the preferred options of the DPD and the SA Report.</li> <li>● <b>D2(i):</b> Appraising significant changes.</li> </ul>

Figure 2: Production tasks – stages B – D of Sustainability Appraisal<sup>7</sup>

In terms of the preparation of the Area Action Plan, the Sustainability Appraisal process aims to ensure that the plan addresses the key sustainability issues identified in the previous evidence gathering stage and presented in the Sustainability Appraisal Scoping Report.

The draft plan that has been prepared has been influenced by the key sustainability issues identified in the Scoping Report and the ongoing Sustainability Appraisal process. This Sustainability Appraisal Report shows how options were assessed during the preparation of the plan and assesses the effects of the Preferred Options set out in the draft Area Action Plan.

### 2.2.3

#### *Overall Assessment of the Area Action Plan Against the Sustainability Objectives*

The Sustainability Appraisal assesses overall whether the contribution that the Area Action Plan makes in relation to each of the sustainability objectives is positive, negative, neutral or uncertain. The following symbols are used:

yy	= Significant positive contribution
y	= Positive contribution
-	= Neutral contribution
n	= Negative contribution
nn	= Significant negative contribution
?	= Unknown contribution

### 2.2.4

#### *Assessing and predicting effects*

The overall assessment represented by these symbols is ultimately determined by the judgement of the persons undertaking the appraisal taking into account the available quantitative and qualitative information that has a bearing. The judgement is arrived at by following what should be a repeatable process that is documented as part of the appraisal process. The process involves:

1. **Predicting effects** of the area action plan in relation to each of the sustainability objectives by describing the changes that will arise as a result of implementing the plan.
  - Predict effects of options in relation to “business as usual” and in relation to each other.
  - Describe changes in terms of their
    - magnitude, their
    - geographical scale, the
    - time period over which they will occur, whether they are
    - permanent or temporary,
    - positive or negative,
    - probable or improbable,
    - frequent or rare, and whether or not there are
    - secondary
    - cumulative and/or
    - synergistic effects.
2. **Assessing effects** of the area action plan by determining the significance of the impacts arising from the predicted changes.
  - Determine the significance of an effect e.g. its
    - scale and permanence and the
    - nature and sensitivity of the receptor. It should be noted whether the effect is likely to be
    - positive, negative, neutral or uncertain, and the
    - timescale and significance of the effect – whether it is likely to be
    - short-term or long-term, and whether
    - major or minor. Any
    - cumulative effects should also be identified.

### 2.2.5

#### *Next Steps in the Appraisal*

Following the publication of this Sustainability Appraisal Report, the Sustainability Appraisal will continue as follows:

- Consultation on the Sustainability Appraisal Report (coinciding with consultation on the Area Action Plan Preferred Options);
- Monitoring and Review.

## 2.3 Consultation during Sustainability Appraisal

Planning Policy Statement 1 sets out the principles that the Government believes should underpin community involvement in the planning process. It is clear that Sustainability Appraisal should also involve the public and time is built into the process for consultation at each stage.

The SEA Directive gives rise to specific requirements for consultation with the public and stakeholders. It requires authorities to consult “the public affected or likely to be affected by, or having an interest in” a plan. It also gives rise to the requirement that authorities which, because of their social, environmental and economic responsibilities, are likely to be concerned by the effects of implementing the plan must be consulted on the scope and level of detail of the information to be included in the SA Report.

In the SEA Regulations the Government has designated four consultation bodies:

- the Countryside Agency,
- English Heritage,
- English Nature, and
- the Environment Agency,

as “authorities with environmental responsibility” (or “consultation bodies”), in relation to the SEA Directive. Additional bodies may be designated as “specific consultation bodies” in the Regional Planning and Local Development Regulations.

The public and the statutory authorities discussed above must be consulted on the plan issues and options – and the sustainability appraisal of these issues and options – at the appropriate time.

### 2.3.1 *Previous consultation during the Sustainability Appraisal process*

An informal period of consultation was held in September and October 2005, providing both general and specific consultees with an opportunity to indicate their preferred options for Lewisham Town Centre. The issues and options report that was used as a basis for consultation, included initial feedback on the sustainability implications of the proposed options.

Copies of the Sustainability Appraisal scoping report were sent to each of the four statutory consultation bodies and Government Office for London in June 2005. Written responses were received from: Environment Agency, English Heritage; Countryside Agency and from the Government Office for London. The responses were reviewed and taken into account where possible. As a result there have been some changes to the sustainability objectives and the Sustainability Appraisal Framework. A summary of the responses is included in **Annex A**.

### 2.3.2 *Consultation on the Sustainability Appraisal Report*

Copies of the Sustainability Appraisal Report will be sent to the four statutory consultation bodies and to the organisations that will comment on the Area Action Plan. The report will also be made available in electronic form on the London Borough of Lewisham website.

# 3 Lewisham Town Centre

This section introduces the Lewisham Town Centre area, for which an action plan is being prepared and summarises the strategic and local context.

## 3.1

### Location

Lewisham is an inner London Borough covering around 14 square miles, located in south east London. It is a vibrant and diverse Borough, home to more than 240,000 people. It is in a dynamic and strategic location and designated as a Major Centre within the London Plan. **Lewisham Town Centre** is especially well connected to central London by rail and DLR and has developed as an important retail and service centre, centred on the historic street market, and the Riverdale Shopping Centre.

In addition, Lewisham is located within the Thames Gateway area of London. The Thames Gateway (TG) is the name given to the area that extends from Lewisham and Tower Hamlets in London to Tilbury in Essex and the Isle of Sheppey in Kent. This area has been identified by Government as the main area for development growth in the South East. Lewisham is part of the Thames Gateway and a member of the London Partnership set up to achieve social, cultural, economic and physical regeneration in this part of London and beyond.

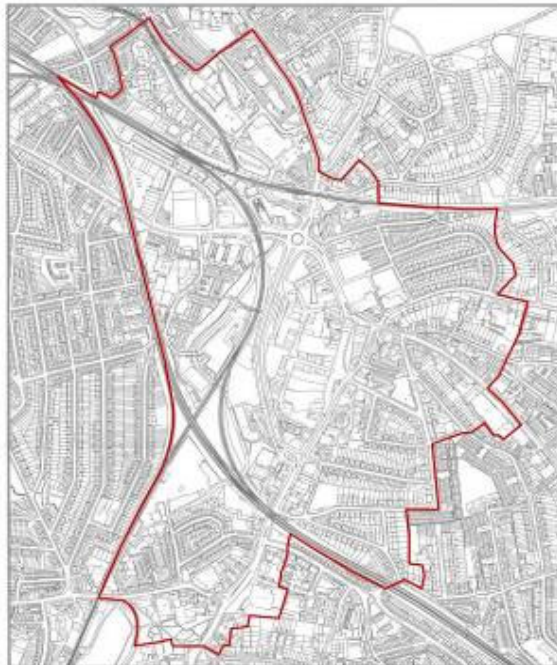


Figure 4: Proposed Area Action Plan boundary

Lewisham Council is the largest single employer in the Borough. The Council is crucial in many activities that affect the lives of Lewisham residents, including the quality of the environment, education, community care, and housing. As a framework for implementing the Council's many functions a number of strategy documents are produced. Some of these, such as the Housing Investment Programme (HIP), the Local Implementation Plan (LIP) and Single Regeneration Budget (SRB) schemes, are used to both set out policy and bid to central government for finance. Some are statutory such as the Economic Development Plan and others are informal such as the Community Safety Plan. Many of the Council's activities involve other partners and often strategic documents are produced in co-operation with these partners. The Local Agenda 21 Plan, the Biodiversity Action Plan and the Lewisham Challenge Partnership are all examples of such documents.

# 4 Sustainability Context and Issues for Lewisham Town Centre

This section summarises the information that was gathered in the first phase of the Sustainability Appraisal and which determined the objectives, indicators and targets that constitute the Sustainability Appraisal Framework.

## 4.1 Baseline Information

Baseline sustainability information has been identified and informed the selection of objectives and quantitative targets and will later support the monitoring of plan implementation. The baseline information identified is provided in the Sustainability Appraisal Scoping Report (May 2005).

### 4.1.1 *Purpose of Baseline Information*

Baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability issues and alternative ways of dealing with them. For each indicator selected, there should ideally be enough information to answer the following questions:

- How good or bad is the current situation? Do trends show that it is getting better or worse?
- How far is the current situation from any established thresholds or targets?
- Are particularly sensitive or important elements of the receiving environment affected (e.g. people, resources, species, habitats)?
- Are the problems reversible or irreversible, permanent or temporary?
- How difficult would it be to offset or remedy any damage?
- Have there been significant cumulative, synergistic or indirect effects over time? Are there expected to be such effects in the future?

### 4.1.2 *Sources of Baseline Information*

The following sources of baseline information were used to produce the scoping report:

- Local Government Performance website: <http://www.bvpi.gov.uk/pages/Index.asp>
- The State of the Borough: An Economic, Social and Environmental Audit of Lewisham, June 2004
- Lewisham Strategic Partnership, Quality of Life Survey 2004.
- Lewisham Primary Care Trust, Lewisham Health Profile, available at: <http://www.lewishampct.nhs.uk>
- Environmental Research Group, King's College London, December 2004, Air Quality In London, Year Ending 30th June 2004
- Metropolitan Police Service Crime Statistics available at <http://www.met.police.uk/crimefigures>
- A Natural Renaissance for Lewisham: Lewisham Biodiversity Action Plan, Lewisham Biodiversity Partnership (LewBP)
- Biodiversity information for Lewisham was also found at <http://www.ukbap.org.uk>
- Quaggy Waterways Action Group available at <http://www.qwag.org.uk/quaggy>
- <http://www.environment-agency.gov.uk/maps> for information on river quality assessments
- National Statistics Website, for local statistics at: <http://neighbourhood.statistics.gov.uk/dissemination/NeighbourhoodProfileSearch.do?areald=276765>
- Urban Renaissance in Lewisham: Health and Social Impact Assessment, March 2004
- Ancer Spa Development, Regeneration & Planning Consultants, Lewisham Economic Development Business plan, Final Report
- Lewisham Housing Commission, Housing in Lewisham From Vision to Reality, April 2000

- London Borough of Lewisham, Homelessness Review & Homelessness Strategy, 2003-2006
- Lewisham Borough Council, The Strategy, Housing Investment Strategy 2004-2007
- Lewisham Local Strategic Partnership, Neighbourhood Renewal Strategy, 2002-2005
- Lewisham Strategic Partnership, community strategy 2003 - 2013
- London Air Quality Network at <http://www.londonair.org.uk/london/asp/home.asp>
- Draft Climate Change Strategy, Adaptive Solutions to Climate Change
- The Lewisham Health Improvement And Modernisation Plan (HIMP), Lewisham Borough Council
- Lewisham Online at <http://www.lewisham.gov.uk/>
- Department of Transport, Focus in Personal Travel, 2005 Edition
- Lewisham Energy Policy 2001, Lewisham Borough Council
- Interim Local Implementation Plan 2002-2003), Lewisham Borough Council
- Lewisham Local Cultural Strategy, December 2002, Lewisham Borough Council
- Nathaniel Lichfield & Partners, London Borough of Lewisham, Retail Capacity Assessment and Site Allocation Study, July 2004
- Mayor of London, London Office Policy Review 2004: A Review of Office Market Trends in 2003/4 and Their Implications for Strategic Planning Policy.

#### 4.1.3 *Practical Considerations and Limitations*

A practical approach is required to both the collection of baseline information and the handling of any gaps now and in the future. In general this scoping report relies on the baseline information listed in the Scoping Report, however no fieldwork or any additional surveys were undertaken.

Some of the baseline information available is generic to the region or local authority, rather than specific to Lewisham Town Centre Action Plan Area and surrounding areas. This is not an exceptional situation and in most cases does not affect the usefulness of the information in relation to the sustainability appraisal indicators and objectives.

The social, economic and environmental issues that were identified from this review are summarised in Section 4.4 below.

#### 4.2 **Relevant Plans, Programmes and Objectives**

A review of the relevant plans and programmes and related sustainability objectives established at other levels of the planning system has been undertaken.

Sustainability Appraisals of Local Development Documents should take account of sustainability policies and objectives set at other levels of the planning system, e.g. in relation to Regional Spatial Strategies and national Planning Policy Statements (or Regional Planning Guidance and Planning Policy Guidance, which they replace respectively). National and international policy and objectives should also be considered where they are relevant.

Details of this review are included in the Sustainability Appraisal Scoping Report (June 2005).

The relevant strategic and local plans and programmes and documents reviewed were:

- The London Plan
- Neighbourhood Renewal Strategy
- European Community Biodiversity Strategy 1998
- Planning Policy Statement 1: Delivering Sustainable Development
- Planning Policy Statement 3: Housing
- Planning Policy Statement 6: Town Centres And Retail Development
- Planning Policy Statement 9: Biodiversity And Geological Conservation
- Planning Policy Statement 10: Sustainable Waste Management
- Planning Policy Statement 22: Renewable Energy
- Planning Policy Statement 23: Planning and Pollution Control
- Planning Policy Statement 25: Development and Flood Risk
- Planning Policy Guidance 4: Industrial and commercial development & small firms
- Planning Policy Guidance 13: Transport (2001)



- Planning Policy Guidance 14: Development on Unstable Land
- Planning Policy Guidance 15: Planning and the Historic Environment
- Planning Policy Guidance 16 Archaeology and Planning
- Planning Policy Guidance 17: Planning for Open Space, Sport And Recreation (2002)
- Planning Policy Guidance 24: Planning And Noise
- Connecting with London's Nature - Mayor's Biodiversity Strategy
- Draft local biodiversity action plan - a natural renaissance for Lewisham
- Open space strategy for Lewisham 2004 - 2009
- Lewisham housing commission - final report (2000)
- Lewisham housing strategy 2004 - 2007
- Lewisham Homelessness Review And Homeless Strategy 03-06
- By Design: Urban Design in the Planning System - Towards Better Practice
- Creative Lewisham - Lewisham Cultural and Urban Development Commission
- RPG3A Supplementary Guidance on the Protection of Strategic Views in London
- Circular 5/94 Planning Out Crime
- Lewisham Environmental Policy / Statement 2002
- Mayor of London's Municipal Waste Management Strategy
- Draft Lewisham municipal waste strategy 2004/05 - 2009/10
- Energy white paper - our future, creating a low carbon economy
- Mayor of London 'Green Light To Clean Power' Energy Strategy
- Lewisham Energy Policy (2001)
- UK Air Quality Strategy - Working Together for Clean Air
- Cleaning London's Air - Mayors Air Quality Strategy
- Draft Lewisham Local Air Quality Action Plan - Dec 2003
- The Mayor's Ambient Noise Strategy
- Draft Lewisham Contaminated Land Strategy 2001
- London Borough of Lewisham Draft Climate Change Strategy
- Use classes amendment order 2005
- Lewisham Economic Development Business Plan 2004
- Planning Employment Land Reviews. Guidance Note ODPM 2004
- Creative Lewisham - Lewisham Cultural and Urban Development Commission
- Lewisham Local Cultural Strategy
- GLA Supplementary Planning Guidance on Industrial Capacity
- Planning Policy Guidance 13: Transport (2001)
- A New Deal for Transport: Better for Everyone (1998)
- Transport 2010: Meeting the Local Transport Challenge (2000)
- The Future of Transport White Paper (2004)
- The Mayor's Transport Strategy (2001)
- The London Road Safety Plan (2001)
- London Borough of Lewisham - Local Interim Implementation Plan (2002-2003)
- Education and skills - Delivering Results a Strategy to 2006 (revised 2002)
- Sustainable Development Action Plan for Education and Skills (2003)
- Delivering Choosing Health: Making Healthier Choice Easier (2004)
- NHS and Urban Planning in London - Final Report (2003)
- Community Strategy (2003-2013)
- Lewisham Health Improvement and Modernisation Plan (2002-2005)
- Lewisham Education Development Plan (2002-2007)
- School Organisation Plan for the London Borough Of Lewisham (2004-2009)
- Lewisham - Skills for Life Programme (2002-2010)
- Lewisham Early Years Development and Childcare Partnership Implementation Plan.

The social, economic and environmental issues that were identified from this review are summarised in Section 4.4 below.

### 4.3 Issues From Consultations and Studies

Urban Practitioners consulted on “Lewisham Town Centre Development Strategy” (August 2004). Consultation was undertaken with key stakeholders through processes such as Steering group meetings; Lewisham Town Centre Walking Audit Event; Lewisham Information Day (Questionnaire); and Stakeholder meetings with Councillors, Council Officers, Landowners, Lewisham Association of Street Traders, the Voluntary sector and other key local representatives. The key issues identified are included in the **Scoping Report** (May 2005).

A consultation process was also undertaken for ‘Urban Renaissance Lewisham: Health and Social Impact Assessment’, March 2004. The stakeholders consulted were defined by the following categories: strategic, service providers, local residents, transient and whole population. A range of approaches was adopted to engage people in the evidence gathering. The methods included: publishing the study through articles in local newsletters, holding workshops for groups such as Primary Care Trust staff, making visits to groups such as tenants and residents associations, devising a school based programme which ran throughout one week, undertaking one-to-one interviews and making questionnaires available where people did not have time to have a discussion or workshop.

### 4.4 Summary of Key Sustainability Issues for the SA (Task A3)

The key sustainability issues for Lewisham Town Centre are derived from:

- Results of review of Relevant Plans, Programmes and Objectives
- Results of review of Baseline Information
- Issues from Consultation and studies

The key issues identified are summarised below and included in full in **Annex B**.

Affordable Housing	Flood Risk
Decent Homes	Water Use
Access to the River	Sustainable Transport
Health (Access to services)	Household waste recycled.
Heritage	Open Space
Cultural diversity	Biodiversity (Nature Conservation)
Crime	Air Quality – General Emission Level
Education (Qualifications)	Water Quality
Road Safety	Employment opportunities
Transport – Accessibility	Local business
Inclusive Access	Business Premises
Renewable Energy	Evening Economy
Energy Efficiency of Housing Stock	

These key issues were used to inform the development of the Sustainability Objectives and the Sustainability Appraisal Framework, as set out in the next section.

# 5 The Sustainability Appraisal Framework

This section sets out the framework that will be used to conduct the sustainability appraisal of the Lewisham Town Centre Area Action Plan.

## 5.1 Introduction

### 5.1.1 *Purpose of the Sustainability Appraisal Framework*

The SA Framework provides a way in which sustainability effects can be described, analysed and compared. It is central to the SA process.

### 5.1.2 *Summary of the Appraisal Framework*

Overall the framework consists of distinct objectives, for each of which one or more indicators are identified. Ideally each indicator has an associated quantitative target, usually dependent on the availability of appropriate baseline information.

#### 5.1.2.1 Understanding Sustainability Objectives

The proposed framework is based on a set of sustainability objectives expressed in terms of the desired outcomes. For example, under the sustainability topic of “Health”, Area Sustainability Objective SOC11 is:

*SOC11 To improve inclusive access to local healthcare facilities.*

The proposed sustainability objectives are presented in Section 5.2.

#### 5.1.2.2 Understanding Indicators

The sustainability objectives must be amenable to measurement if they are to be useful in comparing options, predicting and assessing impacts, and – in some cases – in eventual monitoring during the implementation of the plan. In other words it should be possible to determine whether an objective has been achieved or not achieved. For this reason one or more measurable indicators have been identified for each objective. It should be possible to judge whether there is predicted (or actual at the plan monitoring stage) progress towards or movement away from achieving objectives based on these indicators alone.

#### 5.1.2.3 Understanding targets and associated baseline information

Where appropriate targets have been identified, the qualitative objectives have associated targets – and preferably quantitative targets – in terms of their respective indicators. While specific targets are very useful – and quantitative targets are ideal – it is generally only possible to identify targets for objectives where relevant baseline information is available.

The following points clarify what is meant by baseline information:

- Baseline information can be any collection of data that documents the current status in relation to an issue and/or the historic situation.
- This information may be sufficient to establish whether the status of the issue can be described as good or bad and whether the trend is that the situation is getting better or worse.
- Both quantitative and qualitative baseline information can be of value. For example, it is useful to know both the proportion of people in an area within 500m of a bus stop, and the route of the bus and location of stops relative to desirable destinations. The latter information could be shown on a route map, for example. Some qualitative baseline information has been included in the baseline information in the Scoping Report (May 2005).

## 5.2

**Proposed Sustainability Objectives**

The sustainability objectives used for sustainability appraisal of the Lewisham Town Centre Area Action Plan are presented in Table 1.

Ref	Topic	Sustainability Appraisal Objectives
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport
Soc2	Decent homes	To increase the provision of housing that meets decent homes standards
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities
Soc5	Heritage	To protect and enhance heritage buildings
Soc6	Culture	To protect and enhance cultural diversity
Soc7	Crime	To reduce crime levels in the town centre
Soc8	Education	To increase access to lifelong learning
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.
Soc10	Road safety	To improve pedestrian safety in the town centre
Soc11	Health	To improve inclusive access to local healthcare facilities
Soc12	Noise	To reduce noise from road traffic, construction and industry
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces
Env1	Flood Risk	To manage the risk of flooding (including climate change) and reduce its effects.
Env2	Sustainable transport	To reduce dependency on private cars
Env3	Renewable energy	To increase on-site renewable energy provision
Env4	Energy efficiency	To increase the energy efficiency performance of existing buildings
Env5	Waste and recycling	To increase the amount of waste recycling
Env6	Water use	To provide sustainable sources of water
Env7	Air quality	To improve air quality
Env8	Biodiversity	To value, protect and enhance biodiversity
Env9	Water environment	To protect, manage and enhance the Rivers and associated habitats
Eco1	Retail offer	To increase the diversity of the retail offer
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy
Eco3	Local business	To increase density of local business
Eco4	Employment opportunities	To increase access to local employment

Table 1: Sustainability objectives

These sustainability objectives are distinct from the plan objectives of the Area Action Plan. The process of drawing up the sustainability appraisal framework and the sustainability objectives in particular involved looking at:

- The feedback from consultation and issues raised by those with local knowledge;
- The objectives, targets and indicators contained in plans and policies at various levels;
- Issues emerging from a review of baseline data.

This process is summarised in Figure 3.

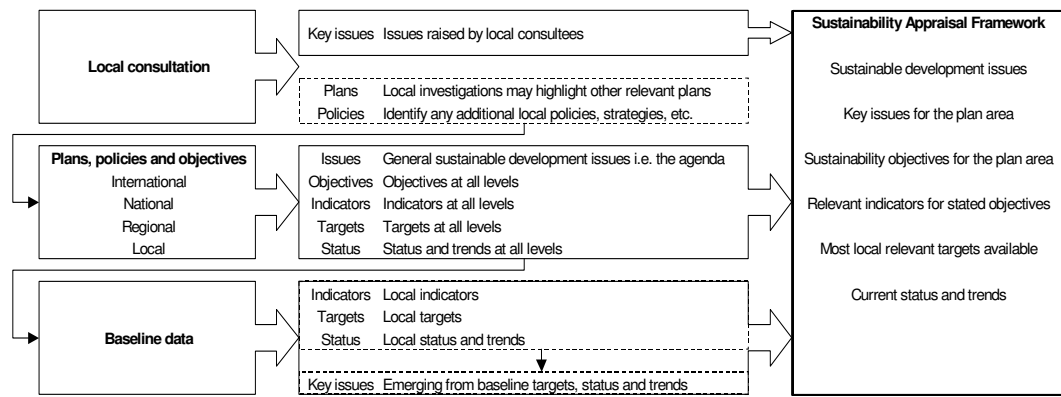


Figure 3: Approach to developing Sustainability Appraisal Framework and objectives.

As the Area Action Plan objectives and the sustainability appraisal objectives are distinct, there is the possibility of conflict between the two sets of objectives. The compatibility of both sets of objectives in sustainability terms was considered, and this is discussed further in Section 7.2.

5.2.1

*Results of consultation*

Views were sought from the statutory environmental bodies in accordance with the SEA Regulations. The results of the consultation on the Scoping Report are included in **Annex A**.

The following objectives were changed partly from the consultation process and partly to refine and simplify the interpretation of the objectives.

Ref	Proposed Sustainability Objectives (Scoping Report)	Final Sustainability Appraisal Objectives	Changes
Env1	To reduce the risk and effects of flooding	To manage the risk of flooding (including climate change) and reduce its effects.	Changed to cover overall impacts of climate change.
Env9	Not included	To protect, manage and enhance the Rivers and associated habitats	Added objective to strengthen the role of the river environment

Table 2: Changes to SA objectives.

### 5.3 Proposed Sustainability Appraisal Framework

The table below shows each of the proposed sustainability objectives along with indicators that can be used to assess achievements against the objectives at the plan-making stage. The sustainability appraisal framework may also serve as the basis for monitoring eventual implementation of the Area Action Plan. More details on baseline information are included in the Scoping Report (June 2005).

ASO		Sustainability Objective	Indicator
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property Prices (£)
			Proportion of rented accommodation (number of renting households)
			Number of people applying for statutory homelessness.
			Number of homeless applications accepted.
			Number of households in temporary accommodation
			New homes built on previously developed land.
Soc2	Decent homes	To increase the provision of housing that meets decent homes standards	Proportion of local authority houses designated non-decent (number of dwellings)
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers	% of residents surveyed expressing satisfaction with the levels of recreational access to the river
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities	% of residents surveyed satisfied with the community facilities provision
Soc5	Heritage	To protect and enhance heritage buildings	Levels of investment in retaining and maintaining list buildings
			Condition of listed building in the local area
Soc6	Culture	To protect and enhance cultural diversity	No indicator
Soc7	Crime	To reduce crime levels in the town centre	Number of offences per 1000 of population
			Proportion of households by tenure
			Detailed indicators for the following:
			- violence against person - burglaries - robberies - violent crime - sexual offences
Soc8	Education	To increase access to lifelong learning	Adult education provision
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.	% of residents satisfied with the levels of access to amenities
			% of vulnerable residents satisfied with the levels of access to amenities
Soc10	Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population / Serious or fatal)
			number of road accidents with people slightly injured

ASO		Sustainability Objective	Indicator
Soc11	Health	To improve inclusive access to local healthcare facilities	% respondents in 'good health'
			Life expectancy (years)
			Infant mortality rates
			Mortality ratio
			% of people with lifelong limiting illnesses
Soc12	Noise	To reduce noise from road traffic, construction and industry	Number of complains to the council from noise and reason
			Number of complaints for noise arising from construction
			Number of complaints for noise arising from traffic
			Number of complaints from noisy neighbours
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces	ha of accessible open space per 1000 population
Env1	Flood Risk	To manage the risk of flooding (including climate change) and reduce its effects.	Number of people and properties affected by fluvial flood incidents
			Number of properties with sustainable drainage systems
			Number of properties with surface water attenuation
Env2	Sustainable transport	To reduce dependency on private cars	Proportion of people going to work by different means i.e. private car, cycle, walk, bus, train, underground etc
			Leisure trips by mode of transport.
			Percentage of residents surveyed using different modes of transport, reasons and distance travelled
Env3	Renewable energy	To increase on-site renewable energy provision	Carbon dioxide savings in tonnes per annum from installation of on-site renewables
			reduction in carbon dioxide emissions tonnes/annum
Env4	Energy efficiency	To increase the energy efficiency performance of existing buildings	NHER, SAP rating for dwellings; BREEAM for other buildings
			% of new dwellings that cut carbon dioxide emissions and the costs of heating and hot water by up to 25%
Env5	Waste and recycling	To increase the amount of waste recycling	kgr of household waste per head per year
			tonnes of waste landfilled per year
			% household waste recycled
			Methods of waste disposal
Env6	Water use	To provide sustainable sources of water	Average water consumption per person per year (m3/person/year)
			% of dwellings that have a water meter
			% of dwellings with water recycling and harvesting
			Demand and supply of public water
			Promotion of water efficiency including water metering and building regulations
			Number of abstractions for public water supply

ASO		Sustainability Objective	Indicator
			Number of licensed abstractions and effective rainfall
Env7	Air quality	To improve air quality	Number of days per year when pollution levels are moderate or higher
			Number of days per year when air pollution is moderate or higher for PM10.
			Annual average nitrogen and sulphur dioxides concentration.
Env8	Biodiversity	To value, protect and enhance biodiversity	Road Traffic
			Changes in population of selected characteristic species
			Achievement of Biodiversity Action Plan Targets
Env9	Water environment	To protect, manage and enhance the Rivers and associated habitats	Area of land actively managed for nature conservation
			Area of length of fluvial habitat movement
			Ecological, chemical, biological and aesthetic water quality
Eco1	Retail offer	To increase the diversity of the retail offer	Changes in population of selected characteristic species.
			Achievement of Biodiversity Action Plan Targets
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy	Retail floorspace
			Number of different retail functions and types accommodated in the area
Eco3	Local business	To increase density of local business	Evening Economy - available floorspace
			Number of new businesses in the area
Eco4	Employment opportunities	To increase access to local employment	Survival rate of new businesses
			% unemployed council residents
			% of population of working age who claim unemployment benefit
			number of years unemployed by age

Table 3: Sustainability appraisal framework



## 6 Plan Options

This section sets out the results of the review of the Issues and Options report that was undertaken in June 2005.

Initial feedback was provided on the sustainability implications of the proposed plan options by providing a commentary on each set of options. Wherever possible, the preferred option was identified.

The results of this analysis were included in the Issues and Options report and can be found in **Annex C**.

An example of the review of the options relating to Housing is shown below:

HOUSING		
LCT1 The Borough has a target of 17,350 additional dwellings to 2016 (currently a target of 9,750 homes to be built by 2016 under the proposed alterations to the London Plan). How can housing need best be met in the town centre?		
Plan Options		Initial Appraisal
A	<i>Have policies seeking to increase the density of residential uses (see also Issue HSG3).</i>	Increasing density through the redevelopment or conversion of existing sites (Option B) would help to reduce pressure on open space or on sites that may have ecological value.
B	<i>Have policies encouraging the redevelopment or conversion of existing sites with residential as part of a mix (e.g. employment/retail ground floor with residential above).</i>	Increasing the amount of dwellings could contribute towards Sustainability Objectives Soc1 (provision of high quality affordable homes) if there is a policy approach to delivering a proportion of affordable for developments – as proposed below.
C	<i>Promote new development in the town centre including residential uses as part of a mix of uses. This could be achieved by the allocation of specific additional sites in the town centre to include some residential development.</i>	If all housing developments (through either Option A, B or C) are close to public transport this would contribute towards meeting Sustainability Objective Env2 (to reduce dependency on private cars).  Conversion of existing buildings (Option B) could contribute towards Sustainability Objective Soc2 (To increase the provision of housing that meets decent homes standards) where the new housing replaces poor quality existing housing.

Table 4: Example of review of options against sustainability objectives

This review contributed towards the development of the Preferred Options and the draft policies, as set out in the next section of this report.

# 7 Plan policies

This section considers the compatibility of the Area Action Plan and sustainability objectives and presents an assessment of the effects of the Area Action Plan policies in relation to the sustainability framework.

## 7.1

### Lewisham Town Centre Draft Policies

The Issues and Options report (June 2005) set out the main issues and options for the Lewisham Town Centre AAP. The report subsequently suggested policy options to correspond to the identified issues covering themes such as:

- Transport,
- Urban Design,
- Shopping & Town Centre,
- Employment
- Housing,
- Community and Leisure
- Open Space.

The draft policy statements, outlined in Table 5, have been derived from the preferred options and government guidance.

The Plan also includes site specific policies for the areas of opportunity (Table 6).

Thematic Policies		
Housing	HSG1	Meeting Housing Needs
	HSG2	Mixed Use Development
	HSG3	Conversion of Existing Buildings
	HSG4	Affordable Housing
	HSG5	Dwelling Mix
	HSG6	Housing Density
	HSG7	A Restrictive Approach to Residential Parking
	HSG8	Traveller's Site
	HSG9	Residential Standards
Shopping & Town Centre	SH1	Lewisham Town Centre
	SH2	Vitality and Viability
	SH3	Lewisham Market
	SH4	Impact of Lewisham Getaway on Southern Part of the Town Centre
	SH5	Core Shopping Areas
	SH6	Non-Core Shopping Areas
	SH7	Retail Character Areas
	SH8	Criteria for Evening Economy Uses
	SH9	Town Centre Boundary
Urban Design	URB1	Tall Buildings in Lewisham Town Centre
	URB2	Sustainability
	URB3	High Quality Design
	URB4	Mixed Use
	URB5	Urban Enclosure, Grain
	URB6	Public Realm
	URB7	Enhancing Lewisham's Waterways

Employment	EMP1	Employment Uses in Lewisham Town Centre
	EMP2	Office Uses in Lewisham Town Centre
Open Space	OS1	Retention of Metropolitan Open Land
	OS2	Waterlink Way Celebrating the River Confluence
	OS3	Enhancing Open Space and Biodiversity
	OS4	Nature Conservation
Transport	TRS1	Lewisham Town Centre Parking Standards
	TRS2	Existing Public / Shopper Parking Spaces in the Town Centre
	TRS3	Cycling and Walking Routes
	TRS4	Mitigating Against the Impact of Roads and Roundabouts
	TRS5	Travel Plan
Environment	ENV1	Protect and Enhance the Environs of the River
	ENV2	Flood Plain
Community & Leisure	COM1	Leisure Centre
	COM2	A New Secondary School for the Town Centre
	COM3	Range of Community, Leisure and Entertainment Spaces
	COM4	Major Developments
Implementation	IMP1	Monitoring
	IMP2	Compulsory Purchase Order Powers
	IMP3	Lewisham Town Centre S106 Pooling and Priorities
	IMP4	Partnership and consultation
	IMP5	Infrastructure and Services
	IMP6	Transport Capacity

Table 5: Thematic Draft AAP Policies

Opportunity Area Policies	
<b>LTCOPP1</b>	<b>Lewisham Gateway</b>
LTCOPP1a	General Principles for Lewisham Gateway
<b>LTCOPP2</b>	<b>Lewisham Centre and Adjoining Land</b>
LTCOPP2a	Entrances and Routes
LTCOPP2b	Urban Form
LTCOPP2c	Public Realm
LTCOPP2d	Vevehicular Servicing and Parking
LTCOPP2e	Molesworth Street Frontage
LTCOPP2f	Land South of the Shopping Centre
LTCOPP2g	Land North East of the Shopping Centre
LTCOPP2h	Molesworth Street surface car park site
LTCOPP2i	Citibank Tower
LTCOPP2j	Lewisham High Street and Market
<b>LTCOPP3</b>	<b>Lee High Road</b>
LTCOPP3a	Lee High Road Western End
LTCOPP3b	Lee High Road Eastern End
LTCOPP3c	Clarendon Green
<b>LTCOPP4</b>	<b>Loampit Vale</b>
LTCOPP4a	Loampit Vale South - a mixed use urban centre
LTCOPP4b	East Side of Elmira Street
LTCOPP4c	West of Elmira Street
LTCOPP4d	Thurston Road Opportunity
LTCOPP4e	Land West of Jerrard Street
LTCOPP4f	Land East of Jerrard Street

LTCOPP4g	Railway Strip
<b>LTCOPP5</b>	<b>Conington Road</b>
LTCOPP5a	Northern Link
LTCOPP5b	Tesco Block
LTCOPP5c	Car Park and Petrol Station
<b>LTCOPP6</b>	<b>Engate Street</b>
LTCOPP6a	Engate Street Mixed Use Block

Table 6: Opportunity Area Draft AAP Policies

## 7.2

### Compatibility of the Area Action Plan and Sustainability Appraisal objectives

The following **key area objectives for the plan** have been proposed, as follows:

- **Theme 1 – Housing:** To make a significant contribution to the provision of high quality housing in the heart of Lewisham town centre, of a range of unit size, mix and tenure type; and, in line with the Core (Spatial) Strategy, to meet housing need, deliver an appropriate level of affordable housing, and implement sustainable patterns of housing development with highest densities focused at highly accessible public transport interchanges.
- **Theme 2 – Retail and town centre status:** To support and improve the vitality and viability of Lewisham town centre, with a view to achieving Metropolitan status.
- **Theme 3 – Urban Design:** To promote sustainable construction and a design-led approach to new development in Lewisham Town Centre, whilst protecting and enhancing existing historic assets.
- **Theme 4 – Employment:** To support an appropriate supply of employment generating uses and sites within the town centre and to promote mixed use development.
- **Theme 5 – Open space/recreation:** To maintain, protect and improve the supply of open space within the town centre, and to incorporate recreational and open space within new developments.
- **Theme 6 – Transport:** To encourage more sustainable patterns of transport development, reduce the need for private car travel and provide high levels of accessibility in Lewisham Town Centre.
- **Theme 7 – Environment:** To protect and enhance nature conservation and biodiversity of the Town Centre and support the principle of environmentally sustainable development at the local scale.
- **Theme 8 – Leisure and community:** To support Lewisham Town Centre in becoming a more accessible and socially inclusive place with adequate provision of community and leisure facilities.
- **Theme 9 – Implementing and monitoring the AAP:** To develop an AAP which responds to local and strategic context.

Ideally the objectives of the Area Action Plan would be entirely consistent with, and be likely to contribute positively to achieving, the Sustainability Appraisal objectives. In practice there may be tensions between objectives. In some cases, testing the compatibility of the two sets of objectives may highlight areas where plan objectives can be modified to improve compatibility. There are some potential conflicts between plan objectives and sustainability objectives, as follows:

The results of the comparison show that there are some areas of possible conflict and it is suggested that the following actions are undertaken to resolve the issues:

- Possible conflict with new affordable housing in terms of increasing car use. Add to current SA objectives to include 'with good connectivity to public transport'

- Possible conflict with new retail, residential and business development with increasing open space and protecting biodiversity. Suggest that consideration of biodiversity, open space and reducing impact on environment are included in AAP objectives
- There is possible conflict between provision of additional housing and access to healthcare, employment and other local facilities for existing and new population. AAP objectives would need to provide for this additional demand.
- Possible conflict with new development and heritage value of existing town centre. Suggest that this consideration is included in AAP objectives.




The compatibility assessment is shown in  Positive compatible  Neutral  Possible conflict

Table 7.

Ref	Topic	AAP Objectives									
		Housing	Retail and town centre status	Urban Design	Employment	Open space/recreation	Transport	Environment	Leisure and community	Implementing and monitoring the AAP	
<b>Social</b>											
Soc1	Affordable homes										
Soc2	Decent homes										
Soc3	Access to river										
Soc4	Community facilities										
Soc5	Heritage										
Soc6	Culture										
Soc7	Crime										
Soc8	Education										
Soc9	Social inclusion										
Soc10	Road safety										
Soc11	Health										
Soc12	Noise										
Soc13	Open space										
<b>Environmental</b>											
Env1	Effects of climate change										
Env2	Sustainable transport										
Env3	Renewable energy										
Env4	Energy efficiency										
Env5	Waste and recycling										
Env6	Water use										
Env7	Air quality										
Env8	Biodiversity										
<b>Economic</b>											
Eco1	Retail offer										
Eco2	Evening economy										
Eco3	Local business										
Eco4	Employment opportunities										

 Positive compatible  Neutral  Possible conflict

Table 7: Compatibility of sustainability objectives and plan objectives

### 7.3

#### **Assessment of the plan policies**

The Area Action Plan policies have been assessed in terms of their impact against each objective in the Sustainability Appraisal Framework.

The draft plan policies have been assessed against the “do *nothing/business as usual*” scenario, to provide a baseline. The predicted effects and assessment of the “do *nothing/business as usual*” scenario are set out in Table 8 below.

The results of the assessment are shown in Table 9 and Table 10 for the Thematic Policies and Table 12 for the Opportunity Area Policies. A characterisation which formed the basis for predicting the effects of the policies, and a detailed assessment for each policy showing how the summary assessment was derived can be found in **Annex D**.

Where significant negative effects are predicted, proposed mitigation measures are discussed in the next section, **7.4**. Predicted significant impacts, both positive and negative, should be priorities for monitoring, which is discussed in section **8.2**.

### 7.4

#### **Significant negative effects of the plan policies and proposed mitigation measures**

Significant negative effects of the plan policies have been predicted in relation to:

- Noise pollution; and
- Waste minimisation

And other negative effects of the plan policies have been predicted in relation to:

- Water use,
- Air Quality, and
- Employment.

The predicted effects, objectives affected, and proposed mitigation measures are summarised in Table 11 and covered in detail in **Annex D**.

### 7.5

#### **Secondary, cumulative and synergistic effects**

In predicting the effects of the Area Action Plan, an attempt has been made to identify secondary, cumulative and synergistic effects that may result from the plan’s implementation. These concepts are explained with great clarity in the CLG guidance<sup>8</sup> on sustainability appraisal as follows:

“Many sustainability problems result from the accumulation of multiple small and often indirect effects, rather than a few large and obvious ones... These effects are very hard to deal with on a project-by-project... It is at the SA level that they are most effectively identified and addressed.

*“Secondary or indirect effects are effects that are not a direct result of the plan/SPD, but occur away from the original effect or as a result of a complex pathway.*

*“Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.*

*“Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Synergistic effects often happen as habitats, resources or human communities get close to capacity.”*

These effects are, by their nature, difficult to predict.

#### 7.5.1

##### *Receptors*

Secondary, cumulative and synergistic effects need to be considered in terms of impacts on receptors. “Receptors may include natural resources (e.g. air, water, soil), sections of the population (e.g. people living in particular areas or vulnerable members of the community) or ecosystems and species”<sup>9</sup>.

<sup>8</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development. CLG (formerly ODP). November 2005 [www.communities.gov.uk/index.asp?id=1161341](http://www.communities.gov.uk/index.asp?id=1161341)

<sup>9</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development. CLG (formerly ODP). November 2005 [www.communities.gov.uk/index.asp?id=1161341](http://www.communities.gov.uk/index.asp?id=1161341)

At Lewisham Town Centre, potential sensitive receptors of secondary, cumulative and synergistic effects are considered to be:

- The Quaggy and Ravensbourne rivers and their respective resident species.
- The climate relating to Greenhouse Gases (and its effect on flora, fauna, the global ecosphere and people);
- Vulnerable people living within the area covered by the plan.

### 7.5.2

#### *Secondary, cumulative and synergistic effects identified*

There could be potential cumulative effects from the proposals for Catford Town Centre and other centres outside of the borough in terms of competition as a major centre. Catford Town Centre would also need to be considered in terms of the potential for increased congestion in the borough.

## 7.6

### **Uncertainties and risks**

The nature, scale and relative magnitudes of effects of the plan policies can be predicted with some confidence. However, there is considerable uncertainty regarding the actual quantitative effects of the proposed policies. The greater part of the effects that the plan is considered to give rise to will occur over the lifetime of the buildings and infrastructure developed as a result of the plan policies. Effects related to building energy use, waste management, and travel preferences for work and leisure, for example, change over time due to policies and attitudes beyond the scope of the plan. Effects which may result directly from the plan, such as those arising immediately during the construction of buildings and infrastructure (e.g. noise, dust, construction jobs) often depend strongly on implementation.

The proposed monitoring plan suggests the data, in the form of indicators that could be gathered to improve the quantitative understanding of the effects of the Area Action Plan.

The Sustainability Appraisal has considered the predicted effects of the proposals being fully implemented. If only some phases or parts of the Plan are implemented, then there may be negative effects that are not mitigated. For example provision of additional housing without appropriate amenities.

ASO	Sustainability Objective	Predicted effects for the "Do nothing" or "Business as usual" scenario	
		Do nothing outline assessment	Do nothing predicted effects
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	The business as usual situation is likely to include a proportion of affordable housing, as this is required by planning policy. This is likely to have a neutral effect.
Soc2	To increase the provision of housing that meets decent homes standards	N	The business as usual situation is unlikely to include refurbishment of existing housing and so is unlikely to have a positive effect on decent homes.
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	NN	The business as usual situation is unlikely to include improving recreational access to the rivers. This is likely to have a negative effect.
Soc4	To increase the provision of accessible and inclusive everyday facilities	NN	The business as usual situation is unlikely to provide accessible and inclusive community facilities. This is likely to have a negative effect.
Soc5	To protect and enhance heritage buildings	NN	The business as usual development is likely to increase density in the development area. This development could have a negative effect on areas of historic value.
Soc6	To protect and enhance cultural diversity	N	The business as usual situation is difficult to predict, but is unlikely to enhance cultural diversity through the provision of high quality urban environments, cultural venues, community facilities, affordable housing, training and employment opportunities.
Soc7	To reduce crime levels in the town centre	N	Business as usual development is unlikely to reduce the current crime levels
Soc8	To increase access to lifelong learning	N	The business as usual situation is difficult to predict, but is unlikely to increase access to training and life long learning.
Soc9	To improve access to amenities for vulnerable members of the community.	N	The business as usual situation is difficult to predict, but is unlikely to increase access to amenities for vulnerable members of the community.
Soc10	To improve pedestrian safety in the town centre	N	The business as usual development is likely to continue the current situation with road traffic growth and no improvements in the pedestrian environment.
Soc11	To improve inclusive access to local healthcare facilities	N	Business as usual development is likely to continue to have negative health impacts, through air pollution, lack of access to public services or healthy living centres and lack of promotion of healthy lifestyles.
Soc12	To reduce noise from road traffic, construction and industry	N	The business as usual situation is likely to generate construction activity that would entail short to medium-term impacts and there would be medium term impacts from traffic congestion and on-going roadworks.
Soc13	To increase the quality and provision of publically accessible open spaces	-	The business as usual development is unlikely to have a positive contribution towards increasing the number of open spaces and access to open space.
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	The business as usual situation is likely to be neutral as all developments will require flood risk assessments to support planning applications.
Env2	To reduce dependency on private cars	N	Business as usual development is likely to worsen the current situation by further increasing the numbers of people travelling to the Town Centre and using the road network. The baseline shows that a large part of the plan area is a Sustainable Living Area.
Env3	To increase on-site renewable energy provision	-	The business as usual situation is likely to contribute towards the provision of on-site renewable energy for large developments due to the GLA target of 10% renewable energy target for large developments.
Env4	To increase the energy efficiency performance of existing buildings	-	The business as usual situation is likely to include more energy efficient developments as these will have to conform with the improved standards of the new Building Regulations as a minimum. The business as usual scenario would not go beyond typical practice however. This would have a neutral effect.
Env5	To increase the amount of waste recycling	N	The business as usual situation is likely to: generate some construction waste from development; and is likely to increase the amount of household waste generated from additional housing provision. Household waste recycling has increased over the last years. Between 2001 and 2002-2003 there has been an increase of 40% in the amount of household waste recycled, while between 2002-3 and 2003-2004 the increase was 14.6%.
Env6	To provide sustainable sources of water	N	The business as usual situation is likely to increase water use as development is unlikely to include water efficient fittings beyond standard practice.
Env7	To improve air quality	N	The business as usual situation is likely to generate construction activity that would entail short to medium-term impacts and there would be medium term impacts from traffic congestion.
Env8	To value, protect and enhance biodiversity	N	The business as usual situation is unlikely to enhance the ecological value of the plan area and is unlikely to protect existing habitats.
Env9	To protect, manage and enhance the Rivers and associated habitats	N	The business as usual situation is unlikely to enhance the ecological value of the River or to protect its existing habitats.
Eco1	To increase the diversity of the retail offer	N	The business as usual situation is expected to increase the retail offer in the town centre. However, this is unlikely to increase the diversity of the offer.
Eco2	To encourage a vibrant, well-managed evening economy	N	The business as usual situation is expected to increase the number of visitors to Lewisham and it is likely that further developments will be undertaken to help to meet demand for retail and possibly leisure uses. This is likely to be uncoordinated development without an appropriate balance of activity and supporting transport arrangements.
Eco3	To increase density of local business	-	The business as usual case is likely to result in an increase in the number of businesses in the area. However; without a Plan the type of sites offered and the type of businesses opening will not be targeted to provided what is required.
Eco4	To increase access to local employment	N	The business as usual development is unlikely to have a positive impact on the local employment opportunities as it is unlikely to promote creative industries, start up units or other initiatives.

Table 8: Predicted effects of 'do nothing/Business as usual scenario



Assessment of the Impacts of the Preferred Policies in the Area Action Plan												
ASO	Sustainability Objective	Short Term	Long Term	Housing	Shopping & Town Centre	Urban Design	Employment	Open Space	Transport	Environment	Community & Leisure	Implementation
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	YY	YY	yy	y	?	?	-	-	-	-	-
Soc2	To increase the provision of housing that meets decent homes standards	YY	YY	yy	y	y	y	-	-	-	-	-
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	YY	YY	-	y	yy	-	yy	y	yy	-	yy
Soc4	To increase the provision of accessible and inclusive everyday facilities	Y	Y	-	y	y	y	y	y	y	yy	yy
Soc5	To protect and enhance heritage buildings	N	N	n	n	y	n	-	-	-	-	-
Soc6	To protect and enhance cultural diversity	?	?	y	-	?	-	-	-	-	y	?
Soc7	To reduce crime levels in the town centre	YY	YY	y	yy	yy	-	?	-	-	-	-
Soc8	To increase access to lifelong learning	Y	?	-	-	?	?	-	-	-	yy	y
Soc9	To improve access to amenities for vulnerable members of the community.	?	?	?	-	?	-	-	y	-	?	?
Soc10	To improve pedestrian safety in the town centre	Y	Y	y	-	y	-	-	y	-	?	y
Soc11	To improve inclusive access to local healthcare facilities	?	?	?	?	?	?	-	-	-	y	y
Soc12	To reduce noise from road traffic, construction and industry	NN	N	n	n	n	n	-	n	-	?	?
Soc13	To increase the quality and provision of publically accessible open spaces	YY	YY	y	y	y	-	yy	-	yy	-	y
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	Y	Y	-	n	y	-	y	-	yy	-	-
Env2	To reduce dependency on private cars	Y	Y	y	?	y	-	-	yy	-	y	y
Env3	To increase on-site renewable energy provision	?	?	?	?	?	?	-	-	-	?	?
Env4	To increase the energy efficiency performance of existing buildings	Y	?	?	y	?	y	-	-	-	?	?
Env5	To increase the amount of waste recycling	N	?	n	n	y	n	-	-	-	n	n
Env6	To provide sustainable sources of water	N	?	n	n	y	n	-	-	-	n	n
Env7	To improve air quality	N	?	n	n	y	?	y	y	y	?	?
Env8	To value, protect and enhance biodiversity	Y	Y	-	-	y	-	y	-	yy	-	-
Env9	To protect, manage and enhance the Rivers and associated habitats	YY	YY	-	n	y	-	yy	y	yy	-	-
Eco1	To increase the diversity of the retail offer	YY	YY	y	yy	y	y	-	y	-	y	-
Eco2	To encourage a vibrant, well-managed evening economy	Y	YY	-	yy	-	-	-	-	-	y	-
Eco3	To increase density of local business	Y	YY	y	yy	y	?	-	-	-	y	-
Eco4	To increase access to local employment	Y	?	y	y	y	nn	-	-	-	y	y

Table 9. Sustainability assessment of Preferred Policies.

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

Assessment of the Significance of the Preferred Policies in the Area Action Plan												
ASO	Sustainability Objective	Short Term	Long Term	Housing	Shopping & Town Centre	Urban Design	Employment	Open Space	Transport	Environment	Community & Leisure	Implementation
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	Positive	Positive	Positive								
Soc2	To increase the provision of housing that meets decent homes standards	Positive	Positive	Positive								
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	Positive	Positive			Positive		Positive		Positive		Positive
Soc4	To increase the provision of accessible and inclusive everyday facilities	Positive	Positive								Positive	Positive
Soc5	To protect and enhance heritage buildings	?	?	Negative		Positive	Negative					
Soc6	To protect and enhance cultural diversity											
Soc7	To reduce crime levels in the town centre	Positive	Positive		Positive	Positive						
Soc8	To increase access to lifelong learning	Positive	?								Positive	
Soc9	To improve access to amenities for vulnerable members of the community.	?	?						Positive			
Soc10	To improve pedestrian safety in the town centre											
Soc11	To improve inclusive access to local healthcare facilities	?	?								Positive	Positive
Soc12	To reduce noise from road traffic, construction and industry	Negative	?	Negative	Negative	Negative						
Soc13	To increase the quality and provision of publically accessible open spaces	Positive	Positive					Positive		Positive		
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	?	Positive		Negative	Positive				Positive		
Env2	To reduce dependency on private cars	?	Positive	Positive					Positive			
Env3	To increase on-site renewable energy provision	?	?									
Env4	To increase the energy efficiency performance of existing buildings	?	?									
Env5	To increase the amount of waste recycling	Negative	?	Negative								
Env6	To provide sustainable sources of water	Negative	?	Negative								
Env7	To improve air quality	Negative	?	Negative								
Env8	To value, protect and enhance biodiversity	Positive	Positive			Positive				Positive		
Env9	To protect, manage and enhance the Rivers and associated habitats	Positive	Positive					Positive		Positive		
Eco1	To increase the diversity of the retail offer	Positive	Positive		Positive							
Eco2	To encourage a vibrant, well-managed evening economy	Positive	Positive		Positive							
Eco3	To increase density of local business	Positive	Positive		Positive							
Eco4	To increase access to local employment	?	?				Negative					

Table 10. Significant negative impacts of the plan policies.

Positive contribution	Possible conflict	Neutral or N/A
-----------------------	-------------------	----------------

Ref	Topic	Overall Policy assessment	Comments	Mitigation
Soc12	Noise	N		<p>The impacts of increased noise can be limited (by controlling when noise and vibration occur, for how long and at what levels) but not entirely eliminated. Unnecessary noise and vibration can be prevented by strict enforcement.</p> <p>Proposals:</p> <ul style="list-style-type: none"> <li>• Current noise levels should be surveyed to establish the current situation. Noise levels should be monitored adjacent to sensitive sites (e.g. dwellings and offices) during development works.</li> <li>• Developers should be asked at the planning stage to draw up a plan for mitigating noise impacts on sensitive sites including, for example: routing construction traffic away from sensitive sites; agreeing neighbourly site working schedules; noise monitoring during works; careful choice of plant to minimise noise on site; choice of lower noise construction techniques (e.g. for piling); plans for liaising with local stakeholders and responding to complaints.</li> <li>• The timing of different works, including works outside the plan area should be considered when assessing potential noise and disruption and planning mitigation.</li> </ul>
Env5	Waste and recycling	N		There would be short to medium-term impacts from construction activities that would have to be minimised through the implementation of Construction Site Management Plans.
Env6	Water use	-	New development will inevitably lead to an increase in water use. Water efficiency can be achieved through the implementation of appropriate measures in developments..	
Env7	Air quality	-	There will be short to medium term impacts from construction activities, but measures to promote sustainable transport and the creation of additional open spaces should be beneficial in the long term	
Eco4	Employment opportunities	-	There will be positive effects in the short to medium term with employment generated from the construction industry. The long term effects will depend on the type of retail and commercial uses to be developed.	

Table 11: Significant negative impacts of the plan policies and proposed mitigation measures

Assessment of Opportunity Area Policies																										
ASO	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Eco1	Eco2	Eco3	Eco4
LTCOPP1			y	y				y		y		n		t				n	n	t		y	y		y	y
LTCOPP1a				y	y		y					y	y		y	y	y					y				
LTCOPP2										y											y					
LTCOPP2a										y		n						n	n	t						
LTCOPP2b										y																
LTCOPP2c															y											
LTCOPP2d															y											
LTCOPP2e				y						y		n			y			n	n	t					y	y
LTCOPP2f												n						n	n	t						
LTCOPP2g																										
LTCOPP2h	y											n						n	n	n					y	y
LTCOPP2i										y														y		y
LTCOPP2j																							y	y	y	
LTCOPP3												n						n	n	n	y	y	y			
LTCOPP3a	y		y							y		n						n	n	n			y		y	y
LTCOPP3b	y		y									t						n	n	n						
LTCOPP3c													y					n	n	n						
LTCOPP4	y			y								n						n	n	n			y			
LTCOPP4a																										
LTCOPP4b	y			y								n	y					n	n	n						
LTCOPP4c	y			y								n						n	n	n			y			
LTCOPP4d	y											n						n	n	n					y	y
LTCOPP4e	y											n						n	n	n					y	y
LTCOPP4f										y		n			y			n	n	t						
LTCOPP4g	y											n						n	n	n						
LTCOPP5			y									n	y	y				n	n	n			y		y	y
LTCOPP5a									y	y		n	y					n	n	n						
LTCOPP5b			y									n						n	n	n				y		
LTCOPP5c			y									n			y			n	n	n			y			
LTCOPP6	y			y								n						n	n	n			y			
LTCOPP6a	y											n						n	n	t			y	y	y	y

Table 12: Significant negative impacts of the Opportunity Areas plan policies

Positive contribution	Possible conflict	Negative contribution	Neutral or N/A
-----------------------	-------------------	-----------------------	----------------

# 8 Implementation

This section considers issues that will be important during the implementation of the Area Action Plan and makes some proposals for the approach to monitoring the plan's impacts.

## 8.1 Relationship with other plans and programmes

It is important for the ongoing sustainability appraisal at Lewisham Town Centre to both feed into and inform other relevant or related plans and to draw on relevant information and resources available in relation to those other plans. In particular baseline information should be pooled and the approach to monitoring coordinated where possible.

At this stage in the preparation of Lewisham Borough Council's Local Development Framework, there are few local plans and programmes that have been developed and subject to sustainability appraisal.

Developments in areas adjacent to Lewisham Town Centre will have effects cumulative with those affected by the AAP and it would be sensible to coordinate monitoring approaches on common significant impacts.

## 8.2 Proposals for monitoring

The draft CLG Guidance<sup>10</sup> requires that 'the significant sustainability effects of implementing the plan should be monitored to identify unforeseen adverse effects and to enable remedial action to be taken.'

The Sustainability Appraisal monitoring is used to answer questions such as:

- Were the assessment's predictions of sustainability effects accurate?
- Is the plan contribution to the achievement of desired SA objectives and targets?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

Monitoring allows the actual effects of the Area Action Plan to be tested against those predicted in the Sustainability Appraisal. It helps to ensure that problems which arise during implementation, whether or not they were foreseen, can be identified and future predictions made more accurate.

The CLG guidance states that the monitoring may cover several plans and programmes as long as sufficient information about environmental effects is provided for the individual plans and proposals. The appropriate level at which to monitor depends on the type and scale of the plan and programme to be monitored.

### 8.2.1 Monitoring Approach

The significant effects of the AAP will be monitored as part of a wider monitoring strategy for the region. The significant effects are those that may give rise to irreversible damage or where monitoring would enable preventative or mitigation measures to be taken.

Many of these indicators relate to the region or the borough rather than the action area as there is little information available that is specific to Lewisham Town Centre. However, the plan area does not exist in isolation and the effects of the plan will influence the overall indicators for the borough. Some of the indicators will be used to monitor the effects of the plan on Lewisham Town Centre and information will be collected using specific survey data.

<sup>10</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development. CLG (formerly ODPM). November 2005 [www.communities.gov.uk/index.asp?id=1161341](http://www.communities.gov.uk/index.asp?id=1161341)

To ensure there is no duplication of effort, the Sustainability Appraisal monitoring will need to be linked into existing and proposed performance monitoring for plans as far as possible. In particular, the monitoring of the Core Strategy is likely to be using many of the same indicators that are proposed in this Sustainability Appraisal.

### 8.2.2

#### *Monitoring Plan*

Priority issues for monitoring relating to impacts that were identified as significant (positive and negative) in the assessment of the plan policies are highlighted. Monitoring should be targeted both to assess the effectiveness of mitigation of negative effects and to ensure that predicted significant positive effects are being delivered.

It has not yet been decided which of the remaining indicators will be collected and reported as part of the monitoring phase of the sustainability appraisal. This will depend to some extent on the requirements and priorities of other plans and programmes. Common monitoring requirements can be pooled to allow a wider range of indicators to be monitored and reported for Lewisham.

A monitoring plan for Lewisham Town Centre has been proposed and summarised in Table 13.

ASO	Sustainability Objective	Significance		Indicator	Measure	Approach to monitoring
		Short Term	Long Term			
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	Positive	Positive	Property Prices (£)	Number	
				Proportion of rented accommodation (number of renting households)	%	Census
				Number of people applying for statutory homelessness.	Number	Planning Application Analysis
				Number of homeless applications accepted.	Number	Planning Application Analysis
				Number of households in temporary accommodation	Number	Planning Application Analysis
				New homes built on previously developed land.	Number	Planning Application Analysis
Soc2	To increase the provision of housing that meets decent homes standards	Positive	Positive	Proportion of local authority houses designated non-decent (number of dwellings)	%	Resident survey
				Proportion of privately owned dwellings designated as non-decent	%	Resident survey
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	Positive	Positive	% of residents surveyed expressing satisfaction with the levels of recreational access to the river		
Soc4	To increase the provision of accessible and inclusive everyday facilities	Positive	Positive	% of residents surveyed satisfied with the community facilities provision		
Soc5	To protect and enhance heritage buildings	?	?	Levels of investment in retaining and maintaining listed buildings	Number	
				Number of buildings, landscapes, monuments at risk	Number	Planning Application Analysis
				Listed buildings consent applications determined by the Local Authority	Number	
				Condition of listed building in the local area		

**Positive**

Positive Effects

**Negative**

Negative Effects

**?**

Undetermined Effects

ASO	Sustainability Objective	Significance		Indicator	Measure	Approach to monitoring
		Short Term	Long Term			
Soc6	To protect and enhance cultural diversity	?	?	Area of land developed for social and community facilities	Ha	
Soc7	To reduce crime levels in the town centre	Positive	Positive	Number of offences per 1000 of population Detailed indicators for the following: - violence against person - burglaries - robberies - violent crime - sexual offences	Number	BVPI
				Proportion of population that believe that crime has risen in their area over the past two years	%	Resident survey
Soc8	To increase access to lifelong learning	Positive	?	Number of education facilities in the area	Number	
Soc9	To improve access to amenities for vulnerable members of the community.	?	?	% of residents satisfied with the levels of access to amenities	%	Resident survey
				% of vulnerable residents satisfied with the levels of access to amenities	%	Resident survey
Soc10	To improve pedestrian safety in the town centre	?	?	Number of road accident casualties per 100,000 population / Serious or fatal)	Number	BVPI
				number of road accidents with people slightly injured	Number	BVPI
Soc11	To improve inclusive access to local healthcare facilities	?	?	% respondents in 'good health'	%	Census
				Life expectancy (years)	%	Census
				Infant mortality rates	%	Census
				Mortality ratio	%	Census
				% of people with lifelong limiting illnesses	%	Census
Soc12	To reduce noise from road traffic, construction and industry	Negative	?	Number of complains to the council from noise and reason	Number	
				Number of complaints for noise arising from construction	Number	

Positive Positive Effects   
 Negative Negative Effects   
 ? Undetermined Effects



ASO	Sustainability Objective	Significance		Indicator	Measure	Approach to monitoring
		Short Term	Long Term			
				Number of complaints for noise arising from traffic	Number	
				Number of complaints from noisy neighbours	Number	
Soc13	To increase the quality and provision of publicly accessible open spaces	Positive	Positive	Area of accessible open space per 1000 population	Ha	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	?	Positive	Number of people and properties affected by fluvial flood incidents	Number	
				Number of properties with sustainable drainage systems	Number	
				Number of properties with surface water attenuation	Number	
Env2	To reduce dependency on private cars	?	Positive	Proportion of people going to work by different means i.e. private car, cycle, walk, bus, train, underground etc	%	Traffic survey
				Leisure trips by mode of transport.	Number	Traffic survey
				Percentage of residents surveyed using different modes of transport, reasons and distance travelled	%	Traffic survey
Env3	To increase on-site renewable energy provision	?	?	Carbon dioxide savings in tonnes per annum from installation of on-site renewables	tonnes/year	
Env4	To increase the energy efficiency performance of existing buildings	?	?	NHER, SAP rating for dwellings; BREEAM for other buildings	Number	Planning Application Analysis
				% of new dwellings that cut carbon dioxide emissions and the costs of heating and hot water by up to 25%	%	
Env5	To increase the amount of waste recycling	Negative	?	household waste per head per year	kg	BVPI
				tonnes of waste landfilled per year	tonnes/year	BVPI
				% household waste recycled	%	BVPI
				Methods of waste disposal		

Positive

Positive Effects

Negative

Negative Effects

?

Undetermined Effects

ASO	Sustainability Objective	Significance		Indicator	Measure	Approach to monitoring
		Short Term	Long Term			
Env6	To provide sustainable sources of water	Negative	?	Average water consumption per person per year	m <sup>3</sup> /person/year	
				% of dwellings that have a water meter	%	Planning Application Analysis
				% of dwellings with water recycling and harvesting	%	Planning Application Analysis
				Demand and supply of public water		
				Number of abstractions for public water supply	Number	Planning Application Analysis
				Number of licensed abstractions and effective rainfall	Number	Planning Application Analysis
Env7	To improve air quality	Negative	?	Number of days per year when pollution levels are moderate or higher	Days per year	Air Quality Monitoring
				Number of days per year when air pollution is moderate or higher for PM10.	Days per year	Air Quality Monitoring
				Annual average nitrogen and sulphur dioxides concentration.	ppm	
				Road Traffic		
Env8	To protect, manage and enhance the Rivers and associated habitats	Positive	Positive	Changes in population of selected characteristic species	Number	
				Achievement of Biodiversity Action Plan Targets	Number	Lewisham's BAP
				Area of land actively managed for nature conservation	Ha	
				Area of length of fluvial habitat movement	Ha	
				Ecological, chemical, biological and aesthetic water quality		

**Positive** Positive Effects
 **Negative** Negative Effects
 ? Undetermined Effects

ASO	Sustainability Objective	Significance		Indicator	Measure	Approach to monitoring
		Short Term	Long Term			
Env9	To increase the diversity of the retail offer	Positive	Positive	Retail floorspace	m <sup>2</sup>	Planning Application Analysis
				Number of different retail functions and types accommodated in the area	Number	
Eco1	To increase the diversity of the retail offer	Positive	Positive	Evening Economy - available floorspace	m <sup>2</sup>	
Eco2	To encourage a vibrant, well-managed evening economy	Positive	Positive	Number of new businesses in the area		
				Survival rate of new businesses		
Eco3	To increase density of local business	Positive	Positive	Number of new businesses in the area	Number	Planning Application Analysis
Eco4	To increase access to local employment	?	?	% unemployed council residents	%	Census
				% of population of working age who claim unemployment benefit number of years unemployed by age	%	

Table 13: Lewisham Town Centre Area Action Plan sustainability impacts monitoring plan.

Positive Positive Effects  
 Negative Negative Effects  
 ? Undetermined Effects

You have reached the end of the Lewisham Town Centre Area Action Plan Sustainability Appraisal Report. You can read a summary of the report at the beginning of the document.

Additional background and methodological information can be reviewed in the annexes on the following pages.

Annex A

# Annex A: Consultation Responses

Source of Consultation Response	Included in SA	Comments
<b>Environment Agency 20/06/05</b>		
<b>Plans to review:</b>		
PPG9	y	
Local and National Biodiversity Action Plans	y	
Biodiversity Objectives in London Plan	y	
The Wildlife and Countryside Act	y	
Habitats Directive	y	
Water Framework Directive	y	
EA South London Flood Risk Management Plan	n	Not Available
<b>Baseline Info</b>		
Locations of designated and other important sites for biodiversity	n	Not in SA scope
Land use and habitat distribution maps	y	
Other protected species include Black Reestrats	y	
More emphasis on the importance of the Borough's watercourses	y	
Identify areas of currently low conservation value	y	
Importance of brownfield sites	n	Not in SA scope
<b>Objectives</b>		
Meet UK Biodiversity Plan objectives	y	
Maintain and enhance BAP habitats and species in line with targets	n	Too detailed for SA
Maintain, develop and improve salmon, freshwater fish and eel fisheries in freshwaters	n	Too detailed for SA
<b>Indicators</b>		
Achievement of BAP objectives and targets	y	
Area of land actively managed for nature conservation	y	
Area or length of fluvial habitat improvement	y	
Ecological and chemical water quality	y	
<b>Targets</b>		
Create x new areas of BAP habitats	n	Not in SA scope
Increase by x the area of land actively managed for conservation	n	Not in SA scope
Maintain or improve ecological and chemical water quality	n	Not in SA scope
<b>SA Objectives</b>		
Env1 - Flood Risk: To manage the risk of flooding (including climate change) and reduce its effects	y	
Env6 - Water Use: To provide sustainable sources of water and promote water recycling	n	This is an activity not an objective
Env9 - Water Environment: To protect, manage and enhance the Rivers and associated habitat	y	
<b>Indicators</b>		
Env1: Number of properties affected by flooding	y	

Source of Consultation Response	Included in SA	Comments
Env1: Number of properties with sustainable urban drainage systems	y	
Env1: Number of properties with surface water attenuation	y	
Env4: % of new dwellings that cut CO2 emissions and the costs of heating and hot water by 25%	y	
Env5: Waste disposal methods, type and quantity	y	
Env6: Average water consumption per person per year	y	
Env6: % of dwellings with water recycling and harvesting	y	
Env6: % of dwellings that have a water meter	y	
Env6: Licensed abstractions and effective rainfall	y	
Env6: Abstractions for public water use	y	
Env6: Demand and supply of public water	y	
Env7: Number of days when pollution is moderate or higher (Headline indicator from UK Government's Sustainable Development Strategy 1999)	y	
Env7: Road traffic	y	
Env7: Particulate concentration	y	
Env9: River water quality - chemical, biological, aesthetic	y	
<b>AAP and SA Objectives</b>		
Env 1 and Theme 2 - consider it to be positive compatible	y	
Env 1 and Theme 3 - consider this to be a possible conflict	y	
Env 1 and Theme 4 - consider this as neutral	y	
<b>Woodlands Trust</b>		
<b>Objectives</b>		
Env1 - Incorporate measures to adapt to the effects of climate change	y	
<b>The Garden History Society 19/06/05</b>		
<b>Key Sustainability Issues</b>		
Include "need to protect cultural heritage landmarks, including historic parks and gardens"	y	
<b>Youth Culture Adviser to Mayor of Lewisham 22/06/05</b>		
<b>Issues</b>		
Consideration should be given to creative industries profile in the town centre, exhibition and performance spaces	y	
<b>Martin Robeson Planning Practice on behalf of Land Securities Plc 20/06/05</b>		
<b>Objectives</b>		
Eco1 - Retail Offer: Recast to refer to "increasing strength and focus of the retail offer"	n	

Annex B



## Annex B: Key Sustainability Issues

Topic	Key issues and problems
<b>Social</b>	
Affordable homes	<p>Lewisham is a particularly affordable borough benchmarked regionally. In Lewisham it is estimated that between 7,250 and 12,950 additional affordable dwellings might be required over the next 8 years (from 2000) to meet future housing need in full. Demand will be fuelled by growth in the number of households locally as well as internal and international migration (including asylum seekers seeking residency in Lewisham)</p> <p>This fits with the London Plan requirement to provide more affordable housing in the Borough.</p> <p>The Lewisham Housing Commission report calls for more flexible tenure, including part ownership and other shared housing schemes.</p> <p>The results of the recent stakeholder consultation identified that there was an issue with access to affordable housing.</p>
Access to river	<p>There is currently poor access to the rivers. Ravensbourne is the most engineered river in the Greater London area, and along much of its course is culverted, channelled or covered.</p> <p>The results of the recent stakeholder consultation identified a key issue as being poor access to the rivers.</p>
Community facilities	<p>The London Plan requires spatial planning of major public services (Community, health, education). The Plan requires availability of and accessibility to a range of quality community services, particularly education and health in LTC. Protection and enhancement of social infrastructure and community facilities.</p> <p>The results of the recent stakeholder consultation identified a lack of sports/leisure facilities and that there is a lack of facilities for young people.</p>
Heritage	<p>Through heritage projects, to improve the quality of life for people living in the Borough and to use heritage to support education and lifelong learning</p> <p>Creative Lewisham report states that note should be taken of cultural and heritage factors in relation to sustainability.</p> <p>The Borough's built heritage includes:</p> <ul style="list-style-type: none"> <li>• 25 building conservation areas and 540 listed buildings (2 Grade I, 18 Grade II* and 520 Grade II).</li> <li>• Grade I listed buildings are: Boone's Chapel, Lee High Road and St Paul's Church, Deptford, which are Grade I listed buildings; and</li> <li>• Over 100 of these listed buildings in public use, including the Horniman Museum, the Manor House - Lee, former Lewisham Library, Hither Green Library, Forest Hill Library, Lewisham Clock Tower, Lewisham Police Station, the Broadway Theatre, Lewisham Art House and Beckenham Place Park</li> </ul>

Topic	Key issues and problems
Culture	<p>Lewisham Local Cultural Strategy states that the importance of recognising the potential of culture to contribute to wider sustainability objectives. Culture is a medium for achieving improvements in the built environment, the local economy, skills development and quality of life. Through heritage projects, to improve the quality of life for people living in the Borough and to use heritage to support education and lifelong learning.</p> <p>Creative Lewisham report states that note should be taken of cultural and heritage factors in relation to sustainability.</p> <p>Creative Lewisham has a policy promoting creative industries, especially in the north of the borough</p>
Crime	<p>Lewisham Town Centre status as the main shopping destination in the borough affects levels of crime and community safety in the area. The transport interchange and links to much smaller shopping areas means there are a high volume of people in the streets, both as potential victims and perpetrators.</p> <p>Lewisham ranks 56th for total offences out of 376 English and Welsh local authorities – with 60 crimes recorded per 1,000 inhabitants.</p> <p>48% of Lewisham residents feel safe outside in their local area after dark and 35% feel unsafe. Crime and safety has the biggest overall impact on levels of satisfaction with 55% of those who feel unsafe during the day stating that they are dissatisfied with the local area.</p>
Education	<p>About a quarter of the population in Lewisham aged 16 to 74 do not have any qualifications. This is similar to the picture in London, but slightly better than England as a whole.</p> <p>Based on BVPI results for 2003/2004, Lewisham came 132nd out of 147 authorities examined in rank, for the percentage of pupils achieving A-C in more than 5 GCSE's. Over the last five years, standards in education, as shown by the Standard Assessment Tests (SATs), have also improved in respect of younger students in the area.</p> <p>The School Organisation Plan requires adequate provision of school facilities to promote higher standards of achievement. The Plan also sets requirements to equip people with the skills they need for continuing education and employment.</p>
Social inclusion	<p>The London Plan requires a reduction in welfare dependency; an increase the life chances of vulnerable members of the community and to help local communities to develop the capacity to support themselves, act independently, and participate in providing services. Improve the effectiveness, efficiency and sustainability of local public services.</p> <p>The results of the recent stakeholder consultation identified a key issue as being the need for access for elderly and disabled people in the town centre.</p>
Road safety	<p>Based on BVPI results, Lewisham comes 16th out of the 147 ranked authorities in terms of number of fatal or serious transport accidents (2003-2004 figures).</p> <p>The number of road accidents (serious/fatal) has been reduced. Between 2001-2002 reduction was 3.2% and between 2003-2004 reduction of 8.5%.</p> <p>The results of the recent stakeholder consultation identified problems with pedestrian safety, particularly in the high street (conflict with buses and pedestrians).</p>

Topic	Key issues and problems
Health	<p>Lewisham is out-performed by the majority of the comparators, with an average life expectancy rate below the national, regional and sub-regional figures. The borough has a particularly high infant mortality rate (the 34th highest in the country, 5th in the region and the highest in the sub-region) and standardised mortality ratio (6th highest in the country, the highest in the region and the sub-region).</p> <p>In Lewisham Central ward people reported higher levels of limiting long term illness. Lewisham Central residents have also reported lower than average good health levels. In contrast, 69.19% of Lewisham respondents reported their health as being good compared to 68.7% in England.</p> <p>The Community Strategy (2003-2013) calls for equal access to facilities and services. Improve the effectiveness, efficiency and sustainability of local public services</p>
Noise	<p>Based on the Quality of Life survey conducted in 2004, road traffic and road works noise are the most problematic types of noise for Lewisham residents at 49%. This reflects the urban setting of Lewisham. New Cross and Evelyn have the most problem with construction and industrial noise as they are in the most industrial part of the Borough. They also perform badly on noise from neighbours.</p>
Open space	<p>With 415ha of Public Open Space and a resident population of 248,922 (2001 Census) Lewisham has a comparatively low 1.67 ha per 1000 population, when compared to the traditional 2.43 ha per 1000 population (NPFA '6 acre standard)</p> <p>It is proposed to establish a potentially achievable 1.7ha per 1000 population as a local standard for Lewisham by 2006.</p> <p>The results of the recent stakeholder consultation identified a key issue as being access to open and green space.</p>
<b>Environmental</b>	
Effects of climate change	<p>Lewisham households are at high risk of damage from flooding as a result of climate change. A significant proportion of the Borough lies in the floodplain of River Ravensbourne and River Quaggy. This means that a greater land area is at risk from flooding, the floods are likely to occur more frequently and the cost of any single flood event will be higher than in the past.</p> <p>The Draft Climate Change Strategy covers the mitigation against / anticipation of climate change effects including: hotter, dryer weather, drought, increased frequency and severity of floods, effect on communities, residents and workers. Equally, the London Plan states that local effects of climate change (e.g. flood risk) are to be recognised with sustainability objectives but addressed more specifically within Core Strategy SA.</p> <p>The results of the recent stakeholder consultation identified a key issue as being the risk of flooding from the river.</p>
Sustainable transport	<p>According to State of the Borough report, Lewisham has one of the lowest proportions of people in the country travelling to work by car; the 9th highest proportion travelling to work by public transport both nationally and regionally; but a low proportion walking or cycling to work. Lewisham has a lower percentage of people walking or cycling to work, in comparison to the London average.</p> <p>Levels of connectivity in Lewisham are significantly above the national score, but the borough is not as well connected as London East, and particularly London as a whole. The average travel-to-work time is fairly typical for the sub-region and region, but high nationally (ranking 22nd). Many areas are more than 250m from a bus service. No direct bus links to e.g. Lewisham hospital, Savacentre and Lewisham town centre from many parts of the community. Rush hour trains from Grove Park do not stop between Hither Green and London Bridge so cannot be</p>

Topic	Key issues and problems
	<p>used by people working in Lewisham and New Cross.</p> <p>Planning Policy Guidance 13, Transport 2010 require sustainable transport options to reduce car dependence, this includes cyclists, walking and road safety. PPS3 requires the urban design, density and needs of people and community to come before the needs of the car.</p> <p>The results of the recent stakeholder consultation identified a key issue being the poor pedestrian environment and linkages within the town centre and that there was a barrier between the interchange and the town centre that restricts access to public transport. The consultation also identified congestion in the town centre as an issue.</p>
Renewable energy	<p>Lewisham has bought 100% renewable electricity for council sites since December 2000, thereby saving an estimated 30,000 tonnes of carbon dioxide per annum. Lewisham is currently listed as the 11th largest user of Renewable Electricity in Western Europe.</p> <p>In addition to buying hydro electricity and other forms of renewables, Lewisham is practising sustainability by generating energy from the combustion of its domestic waste. The borough's streetlights are all powered by SELCHP, an energy from waste power station producing 30 mega watts net of electricity through the incineration of approximately 420,000 tonnes of waste per year.</p> <p>The Mayor's Green Light to Clean Power Energy Strategy requires the use of renewable energy schemes and requires a 10% contribution from on-site renewable energy for all new large developments. Lewisham's Energy Policy also requires an increase in the proportion of energy generated from renewable energy sources.</p>
Energy efficiency	<p>In 1994, Lewisham Borough Council carried out a Home Energy Audit in social housing stock. The survey identified an average NHER rating of 3.6.</p> <p>According to the Lewisham Housing Strategy Report, 9.57% of Lewisham owner-occupiers live in houses with SAP rating less than 30. 22.30% of private rented houses have a SAP of less than 30.</p> <p>Housing Policy target to Improve SAP rating to 60 by 2004.</p>
Waste and recycling	<p>According to bvpi figures, Lewisham comes 137 of 350 authorities in the country in terms of kgr of hhld waste per head. At 439.7 kgr per head in 2003/2004, Lewisham is slightly below the regional average.</p> <p>Household waste recycling has increased. Between 2001 and 2002-2003 there has been an increase of 40% in the amount of household waste recycled, while between 2002-3 and 2003-2004 the increase was 14.6%.</p> <p>The incineration of 80% of its waste is helping Lewisham Council exceed the national recovery and landfill directive biodegradable waste diversion targets in advance of the target years.</p> <p>The London Plan seeks an integrated approach to waste management for the whole Borough and to consider the potential / viability of using sites in LTC for Waste Management in tandem with the Core Strategy. The Plan seeks to provide adequate storage facilities in new development in LTC.</p> <p>The Lewisham Municipal Waste Strategy requires the provision of sites for waste processing and disposal. Issues such as flytipping need to be addressed and the recycling message needs to be promoted.</p>

Topic	Key issues and problems
	The results of the recent stakeholder consultation identified a key issue as being the refuse and associated environmental effects of the street market.
Water use	The London Plan requires water efficiencies and adequate infrastructure and to ensure that adequate water resources and infrastructure is available in new developments.
Air quality	<p>A large part of the pollution in Lewisham originates from road traffic with an additional smaller amount originating from other sources. (Source: Lewisham Air Quality Action Plan).</p> <p>Air quality and traffic pollution are also considered by the public as a large problem especially in the central Lewisham wards of Lewisham Central and Rushey Green (Quality of Life Survey 2004).</p> <p>The draft Lewisham Air Quality Action Plan promotes land uses and activities that have minimum impacts on air quality.</p> <p>The results of the recent stakeholder consultation identified air quality issues associated with the level of traffic on congested roads.</p>
Biodiversity	<p>The borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park, and Hilly Fields.</p> <p>The Lewisham Biodiversity Action Plan includes action plans for habitats such as rivers and streams. The Quaggy and Ravensbourne rivers are identified as ecological features. The chemical and biological quality of the rivers is improving according to Environment Agency data.</p>
<b>Economic</b>	
Retail offer	<p>The London Plan includes reference to maintain, enhance and manage LTC as a local centre. Lewisham is classified as a sub regional centre, and is ranked 165th out of 1,672 centres across Great Britain. Catford is classified as a district centre and is ranked 421st.</p> <p>The percentage of retail floorspace out of all available commercial floorspace for Lewisham is 38.3% while the equivalent figure for office accommodation is 12.9%.</p> <p>Levels of growth in retail floorspace are particularly low, perhaps because current proportions are so high (ranking 10th highest for retail in England, 6th highest in London and second in London East).</p> <p>The results of the recent stakeholder consultation identified a key issue as being the poor retail offer with no department stores and a lack of quality retail.</p> <p>The results of the recent stakeholder consultation identified a number of key issues with the street market, including mess and refuse, upgrading, improper parking</p>
Evening economy	The results of the recent stakeholder consultation identified a key issue as being the lack of an evening economy.

Topic	Key issues and problems
Local business	<p>Lewisham ranks 24th for business and enterprise out of the 408 British local authorities, positioned in the middle of the comparators.</p> <p>Local business stock increased by almost 20 per cent between 1994-2003, a very high growth rate benchmarked nationally (ranking 35th).</p> <p>Despite high growth rates, business density remains comparatively low and the business community seems dominated by small businesses.</p> <p>The results of the recent stakeholder consultation identified a lack of sites for business incubation.</p>
Employment opportunities	<p>According to the 2004 English Indices of Multiple Deprivation, Lewisham has an overall rank of 57 out of 354 local authorities. Of particular concern is Lewisham's levels of income deprivation, the 28th highest in the country; barriers to housing and services deprivation, the 27th highest in the country; crime deprivation (ranking 63rd) and living environment deprivation (ranking 35th). Bellingham, Downham, Deptford and New Cross are marked as the most deprived areas.</p> <p>The unemployment rate for Lewisham is 6.7% compared to 4.7% in Greater London. Unemployment is a principal cause of poverty and social exclusion. Approximately 29% of Lewisham's unemployed have been out of work for over 2 years and just over 10% have been unemployed for over 3 years. 44.7% of unemployed residents have been out of work for over 6 months.</p> <p>The Planning Employment Land Reviews calls for a review of existing employment sites in terms of sustainability objectives.</p>

Annex C

## Annex C: Options Review

Plan Options	Initial Appraisal
<b>HOUSING</b>	
<b>LCT 1</b>	<b>The Borough has a target of 17,350 additional dwellings to 2016 (currently a target of 9,750 homes to be built by 2016 under the proposed alterations to the London Plan). How can housing need best be met in the town centre?</b>
A	<p><i>Have policies seeking to increase the density of residential uses (see also Issue HSG3).</i></p> <p>Increasing density through the redevelopment or conversion of existing sites (Option B) would help to reduce pressure on open space or on sites that may have ecological value.</p>
B	<p><i>Have policies encouraging the redevelopment or conversion of existing sites with residential as part of a mix (e.g. employment/retail ground floor with residential above).</i></p> <p>Increasing the amount of dwellings could contribute towards Sustainability Objectives Soc1 (provision of high quality affordable homes) if there is a policy approach to delivering a proportion of affordable for developments – as proposed below.</p>
C	<p><i>Promote new development in the town centre including residential uses as part of a mix of uses. This could be achieved by the allocation of specific additional sites in the town centre to include some residential development.</i></p> <p>If all housing developments (through either Option A, B or C) are close to public transport this would contribute towards meeting Sustainability Objective Env2 (to reduce dependency on private cars).</p> <p>Conversion of existing buildings (Option B) could contribute towards Sustainability Objective Soc2 (To increase the provision of housing that meets decent homes standards) where the new housing replaces poor quality existing housing.</p>
<b>LCT 2</b>	<b>Borough requires 7,250 to 12,950 affordable dwellings from 2000 to 2008 to meet future housing need. Should there be a specific town centre affordable housing policy?</b>
A	<p><i>No specific affordable housing policy required for Lewisham town centre, the existing borough wide affordable housing policy should be adhered to.</i></p>
B	<p><i>A policy approach which takes a more flexible approach to the provision of affordable housing in Lewisham town centre in terms of size, tenure, location and quantity of provision</i></p>



Plan Options		Initial Appraisal
C	<i>A policy approach which seeks to deliver a higher proportion of affordable housing in Lewisham town centre</i>	
<b>LCT 3</b>	<b>How best can the AAP promote higher residential densities in areas of high public transport accessibility?</b>	
A	<i>Retain existing Sustainable Living Area approach.</i>	Promotion of car-free housing (Option B) for developments near public transport nodes would support Sustainability Objective Soc1 (increase the provision of high quality affordable homes with good connectivity to public transport).
B	<i>Promote car-free housing</i>	Removal of right to street parking permits (Option C) could contribute to Sustainability Objective Env2, although there may be negative effects (e.g. illegal parking and congestion).
C	<i>Removal of right to a street parking permit for occupiers of new residential developments</i>	
<b>LCT 4</b>	<b>How should the AAP make provision for the traveller community?</b>	
A	<i>Identify and allocate a traveller site within Lewisham town centre</i>	This issue is not addressed by the sustainability objectives.
B	<i>Identify and allocate a traveller site outside Lewisham Town Centre</i>	
C	<i>Include a criteria-based policy in order to provide a framework to assess the suitability of new proposals</i>	
<b>RETAIL AND TOWN CENTRE STATUS</b>		
<b>LTC 5</b>	<b>How can Lewisham town centre best move towards Metropolitan Centre status?</b>	
A	<i>Rely on existing site allocations for new retail developments in the town and determine applications for additional retail developments on their merits</i>	Both Option A and B would address Sustainability Objective Eco1 (To increase the diversity of the retail offer), providing that this will increase the diversity of the retail offer.
B	<i>Allocate new sites for retail development with regard to the retail capacity study in order to plan for and accommodate identified retail capacity to help the town centre move toward the floorspace required to meet metropolitan status (100,000m<sup>2</sup>).</i>	Allocation of sites according to the retail capacity study would provide a more planned and predictable approach and may make it easier to consider the other impacts associated with the development. Other impacts would include: road safety (Soc10), sustainable transport (Env2), access to local employment (Eco4).

Plan Options		Initial Appraisal
<b>LTC 6 How can Lewisham Town Centre's vitality and viability best be supported?</b>		
A	<i>Public realm enhancements.</i>	Supporting a greater mix of uses (Option C) would contribute towards Sustainability Objective Eco2 (To encourage a vibrant, well-managed evening economy) and Eco1 (To increase the diversity of the retail offer).
B	<i>Encourage new development on Gateway site to raise profile of Town Centre as a whole.</i>	
C	<i>Support a greater mix of uses including cafes, bars and evening economy to support vitality of retail offer.</i>	Making Lewisham a safer place (Option D) would contribute towards Sustainability Objective Soc7 (To reduce crime levels in the town).
D	<i>Make Lewisham a safer place</i>	Allocating new sites for retail development (Option F) could contribute towards Sustainability Objective Eco2 (To increase the diversity of the retail offer).
E	<i>Support Shop front improvements and funding programmes.</i>	
F	<i>Allocate new sites for retail development.</i>	Encouraging a greater mix of uses, including residential development would contribute towards Sustainability Objective Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport).
G	<i>Encourage a greater mix of uses within the town centre including residential development</i>	
H	<i>Re-development at key locations within the High Street to provide marker buildings with a mix of uses.</i>	
<b>LTC 7 If implemented, Lewisham Gateway has the potential to bring wide ranging benefits to the Town Centre. How should the AAP address the issues associated with Lewisham Gateway?</b>		
A	<i>Allocate the Lewisham Gateway site for high density mixed-use development</i>	High density mixed use development (Option A) could include affordable homes, community facilities, retail and evening economy sites. This type of mixed use would support Sustainability Objectives: <ul style="list-style-type: none"> <li>• Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport);</li> <li>• Soc4 (To increase the provision of accessible and inclusive everyday facilities);</li> <li>• Eco1 (To increase the diversity of the retail offer) providing that this will increase the diversity of the retail offer;</li> <li>• and Eco2 (To encourage a vibrant, well-managed evening economy).</li> </ul> <p>However, it is not clear what mixed use development is proposed for Option A.</p>
B	<i>Rely on existing development site allocation in the UDP to facilitate redevelopment of the roundabout site</i>	
C	<i>Identify and allocate sites in the southern part of the centre for the redevelopment in order to seek to address the change in gravity that is likely to result from the Lewisham Gateway development.</i>	

Plan Options		Initial Appraisal
D	<i>Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime retail as a focus for community activity. This role might be a focus for community activity, with the library representing an obvious stimulus for this role. An alternative focus would be a focus on evening economy uses.</i>	Using the southern part of the High Street as a prime focus for community activity (Option D) would support several Sustainability Objectives: <ul style="list-style-type: none"> <li>• Soc4 (To increase the provision of accessible and inclusive everyday facilities);</li> <li>• Soc9 (To improve access to amenities for vulnerable members of the community);</li> <li>• and potentially Soc8 (To increase access to lifelong learning) through the library.</li> </ul>
<b>LTC 8 What approach should the AAP take to the designation of core and non-core shopping frontages</b>		
A	<i>Maintain current distinction between core and non-core frontages as currently shown on the proposals map.</i>	Integrating a greater mix of uses including the evening economy (Option C) could support Sustainability Objectives Eco1 (To increase the diversity of the retail offer) and Eco2 (To encourage a vibrant, well-managed evening economy).
B	<i>Review existing allocation of core and non-core frontages.</i>	
C	<i>Introduce a geographical basis for designating retail zones with greater scope for integrating a greater mix of uses including evening economy.</i>	
D	<i>Remove shopping frontage designations and rely on town centre boundary.</i>	
<b>LTC 9 How should the town centre's potential for a more vibrant evening economy be managed?</b>		
A	<i>Do not provide a specific town centre policy approach.</i>	Options B, C and D all contribute to sustainability objective Eco 2 (to encourage a vibrant, well-managed evening economy). The policy would have to consider how to ensure that the evening economy is well-managed.
B	<i>Maintain existing core and non-core frontage approach.</i>	
C	<i>Encourage evening economy uses as part of a mix of uses in specified locations.</i>	
D	<i>Concentrate evening economy uses in a particular zone.</i>	
<b>LTC 10 Should the town centre boundary be altered?</b>		
A	<i>Maintain existing designation</i>	Removing one or more of the options i-iv (Option B) would potentially limit the opportunities to provide affordable homes, community facilities, retail offer, employment opportunities, density of local business and access to local employment. This would have a negative contribution to Sustainability Objectives: Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport); Soc4 (To increase the provision of accessible and inclusive

Plan Options		Initial Appraisal
B	<i>Review town centre boundary to achieve a tighter core by removing one or more of options i-vi on the following page</i>	<p>everyday facilities); Eco1 (To increase the diversity of the retail offer); or Eco2 (To encourage a vibrant, well-managed evening economy).</p> <p>Option i - North-west corner of the town centre and Option ii – Conington Road area both benefit from very good levels of public transport accessibility and, therefore, developments on this site would support Env2 (To reduce dependency on private cars).</p>
<b>URBAN DESIGN</b>		
<b>LTC 11 What approach should be taken to the location and design of tall buildings?</b>		
A	<i>Retain existing approach whereby tall buildings are considered appropriate in Lewisham Town Centre if the site is covered by a development brief identifying it as such.</i>	<p>Setting out criteria against which all developments for tall buildings will be considered (Option D) would help to set standards for tall buildings to ensure they contribute towards sustainability. In particular, it could specify that tall buildings:</p> <ul style="list-style-type: none"> <li>- are located close to transport hubs and so supporting Sustainability Objectives Env2 (To reduce dependency on private cars)</li> <li>- consider carbon emissions from these buildings and so support Sustainability Objective Env3 (To increase on-site renewable energy provision)</li> <li>- consider management of waste and recycling and so support Sustainability Objective Env5 (To increase the amount of waste recycling)</li> </ul>
B	<i>Seek to generally encourage tall buildings in the town centre, removing the requirement for development brief endorsement</i>	
C	<i>Seek to concentrate tall buildings in a specific location(s)</i>	
D	<i>Set out criteria against which all developments for tall buildings will be considered, including the requirement to demonstrate the highest quality architecture.</i>	
<b>EMPLOYMENT AND BUSINESS ISSUES</b>		
<b>LTC 12 What policy approach should be taken to existing established industrial areas in the town centre?</b>		
A	<i>Seek to retain existing employment generating uses in the town centre.</i>	<p>Retaining existing employment generating uses (Option A) is not sufficient for Sustainability Objective Eco4 (To increase access to local employment)</p> <p>Releasing land from specific employment allocations (Option B) could have a negative contribution towards Sustainability Objective Eco4 (To increase access to local employment), depending on the type of mixed use schemes proposed.</p> <p>Promoting new office development (Option C) may could contribute to Sustainability Objective Eco4, if this development allowed access to employment.</p>
B	<i>Seek to release land from specific employment allocations in order to promote redevelopment and seek to make the best use of land through mixed use schemes</i>	

Plan Options		Initial Appraisal
C	<i>Seek to protect existing office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.</i>	Conversion of town centre office accommodation to residential uses (Option D) could contribute to Sustainability Objective Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport), but would contribute negatively to Sustainability Objectives Eco4.
D	<i>Seek to encourage the conversion of town centre office accommodation to residential uses.</i>	
<b>OPEN SPACE</b>		
<b>LTC 13</b>	<b>How should the AAP seek to address open space provision within Lewisham Town Centre?</b>	
A	<i>Retain existing open space provision</i>	Ensuring new development provides amenity space would contribute towards Sustainability Objective Soc13 (To increase the quality and provision of publicly accessible open spaces). The other options (A, B and D) would not contribute towards this objective as they either threaten or do not increase open space provision. Improve accessibility to existing provision could contribute towards Sustainability Objective Soc3 (To increase recreational access to the Quaggy and Ravensbourne rivers) if this is related to the river environment.
B	<i>Improve the quality of open space provision</i>	
C	<i>Improve accessibility to existing provision</i>	
D	<i>Ensure new development provides essential amenity space in high density developments</i>	
<b>TRANSPORT</b>		
<b>LTC 14</b>	<b>Should parking standards for new developments be reviewed?</b>	
A	<i>Retain existing standards for new development</i>	Reducing parking standards (Options B and C) would contribute towards Sustainability Objective Env2 (To reduce dependency on private cars) and potentially Soc 10 (To improve pedestrian safety in the town centre) and Soc12 (To reduce noise from road traffic, construction and industry);
B	<i>Adopt London Plan Standards</i>	
C	<i>Apply a more stringent approach than that standards set out in the London Plan</i>	
<b>LTC 15</b>	<b>In the context of potential significant growth in retail floorspace in Lewisham Town Centre, what approach should be taken to the provision of public / shopper parking spaces in the town centre?</b>	
A	<i>Rationalise existing provision to encourage the use of public transport</i>	Maintaining existing parking standards (Option A) would contribute towards Sustainability Objective Env2 (To reduce dependency on private cars) and potentially Soc 10 (To improve pedestrian safety in the town centre) and Soc12 (To reduce noise from road traffic, construction and industry);
B	<i>Seek to retain existing levels of public parking</i>	
C	<i>Seek to increase provision of public parking</i>	

Plan Options		Initial Appraisal
<b>ENVIRONMENT</b>		
<b>LTC 16</b>	<b>Protection of the river environment</b>	
A	<i>New development should contribute to enhance and protect the river environment</i>	Option A would contribute to Soc3 (To increase recreational access to the Quaggy and Ravensbourne Rivers) if they also increase access to the rivers. Option A would also contribute towards Sustainability Objective Env8 (To protect, value and enhance biodiversity) if the ecological value of the rivers is protected and enhanced.
B	<i>On the basis that there is no demonstrable harm to the river and its environment contributions should not be sought.</i>	

## Annex D

## Annex D: Policy Appraisal

ASO	Sustainability Objective	Predicted effects for the "Do nothing" or "Business as usual" scenario	
		Do nothing outline assessment	Do nothing predicted effects
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	The business as usual situation is likely to include a proportion of affordable housing, as this is required by planning policy. This is likely to have a neutral effect.
Soc2	To increase the provision of housing that meets decent homes standards	N	The business as usual situation is unlikely to include refurbishment of existing housing and so is unlikely to have a positive effect on decent homes.
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	NN	The business as usual situation is unlikely to include improving recreational access to the rivers. This is likely to have a negative effect.
Soc4	To increase the provision of accessible and inclusive everyday facilities	NN	The business as usual situation is unlikely to provide accessible and inclusive community facilities. This is likely to have a negative effect.
Soc5	To protect and enhance heritage buildings	NN	The business as usual development is likely to increase density in the development area. This development could have a negative effect on areas of historic value.
Soc6	To protect and enhance cultural diversity	N	The business as usual situation is difficult to predict, but is unlikely to enhance cultural diversity through the provision of high quality urban environments, cultural venues, community facilities, affordable housing, training and employment opportunities.
Soc7	To reduce crime levels in the town centre	N	Business as usual development is unlikely to reduce the current crime levels
Soc8	To increase access to lifelong learning	N	The business as usual situation is difficult to predict, but is unlikely to increase access to training and life long learning.
Soc9	To improve access to amenities for vulnerable members of the community.	N	The business as usual situation is difficult to predict, but is unlikely to increase access to amenities for vulnerable members of the community.
Soc10	To improve pedestrian safety in the town centre	N	The business as usual development is likely to continue the current situation with road traffic growth and no improvements in the pedestrian environment.



ASO	Sustainability Objective	Predicted effects for the "Do nothing" or "Business as usual" scenario	
		Do nothing outline assessment	Do nothing predicted effects
Soc11	To improve inclusive access to local healthcare facilities	<b>N</b>	Business as usual development is likely to continue to have negative health impacts, through air pollution, lack of access to public services or healthy living centres and lack of promotion of healthy lifestyles.
Soc12	To reduce noise from road traffic, construction and industry	<b>N</b>	The business as usual situation is likely to generate construction activity that would entail short to medium-term impacts and there would be medium term impacts from traffic congestion and on-going roadworks.
Soc13	To increase the quality and provision of publicly accessible open spaces	-	The business as usual development is unlikely to have a positive contribution towards increasing the number of open spaces and access to open space.
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	The business as usual situation is likely to be neutral as all developments will require flood risk assessments to support planning applications.
Env2	To reduce dependency on private cars	<b>N</b>	Business as usual development is likely to worsen the current situation by further increasing the numbers of people travelling to the Town Centre and using the road network. The baseline shows that a large part of the plan area is a Sustainable Living Area.
Env3	To increase on-site renewable energy provision	-	The business as usual situation is likely to contribute towards the provision of on-site renewable energy for large developments due to the GLA target of 10% renewable energy target for large developments.
Env4	To increase the energy efficiency performance of existing buildings	-	The business as usual situation is likely to include more energy efficient developments as these will have to conform with the improved standards of the new Building Regulations as a minimum. The business as usual scenario would not go beyond typical practice however. This would have a neutral effect.
Env5	To increase the amount of waste recycling	<b>N</b>	The business as usual situation is likely to: generate some construction waste from development; and is likely to increase the amount of household waste generated from additional housing provision. Household waste recycling has increased over the last years. Between 2001 and 2002-2003 there has been an increase of 40% in the amount of household waste recycled, while between 2002-3 and 2003-2004 the increase was 14.6%.
Env6	To provide sustainable sources of water	<b>N</b>	The business as usual situation is likely to increase water use as development is unlikely to include water efficient fittings

ASO	Sustainability Objective	Predicted effects for the "Do nothing" or "Business as usual" scenario	
		Do nothing outline assessment	Do nothing predicted effects
			beyond standard practice.
Env7	To improve air quality	<b>N</b>	The business as usual situation is likely to generate construction activity that would entail short to medium-term impacts and there would be medium term impacts from traffic congestion.
Env8	To value, protect and enhance biodiversity	<b>N</b>	The business as usual situation is unlikely to enhance the ecological value of the plan area and is unlikely to protect existing habitats.
Env9	To protect, manage and enhance the Rivers and associated habitats	<b>N</b>	The business as usual situation is unlikely to enhance the ecological value of the River or to protect its existing habitats.
Eco1	To increase the diversity of the retail offer	<b>N</b>	The business as usual situation is expected to increase the retail offer in the town centre. However, this is unlikely to increase the diversity of the offer.
Eco2	To encourage a vibrant, well-managed evening economy	<b>N</b>	The business as usual situation is expected to increase the number of visitors to Lewisham and it is likely that further developments will be undertaken to help to meet demand for retail and possibly leisure uses. This is likely to be uncoordinated development without an appropriate balance of activity and supporting transport arrangements.
Eco3	To increase density of local business	-	The business as usual case is likely to result in an increase in the number of businesses in the area. However; without a Plan the type of sites offered and the type of businesses opening will not be targeted to provided what is required.
Eco4	To increase access to local employment	<b>N</b>	The business as usual development is unlikely to have a positive impact on the local employment opportunities as it is unlikely to promote creative industries, start up units or other initiatives.

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

Ref	Topic	Prediction of effects	Overall Policy assessment
Soc1	Affordable homes	<p>The Borough has a target of 9,750 additional homes to from 2006 to 2016. The plan will deliver an estimated 4,100 additional dwellings in the Opportunity Areas (HSG1), with a focus on mixed use and a full mix of developments (HSG2, HSG4). A proportion of this housing will be affordable, with the plan proposing a specific target of 35% of new residential building to be affordable units (HSG3).</p> <p>The plan will increase provision of housing and extends housing options and choice beyond those predicted under the business as usual scenario. The AAP is likely to have a positive effect.</p>	Y
Soc2	Decent homes	<p>The baseline shows that the proportion of local authority houses designated non-decent in 2004 was high with 65.2% compared to London's figure of 45.9% and a Great Britain average of 40.7%.</p> <p>New construction and refurbishment of housing schemes will inevitably cover decent homes standards. The AAP includes a policy (HSG3) that encourages the redevelopment of existing residential or other premises for residential uses, as well as a policy that promotes high quality design (URB3). The AAP is likely to have a positive effect.</p>	Y
Soc3	Access to river	<p>There is currently poor access to the rivers. Ravensbourne is the most engineered river in the Greater London area and along much of its course, it is culverted, channelled or covered.</p> <p>The plan includes a number of policies to ensure new developments will contribute to the protection and enhancement of the river environment (URB7, URB2, SH7, OS2, ENV1). The AAP promotes the improvement of access to the river, the creation of an attractive waterfront, which will enhance the natural habitat of the locality while accommodating appropriate flood defences.</p> <p>The site specific policies make reference to access to rivers and to enhancements. In particular: Loampit Vale South asks for proposals to interact with the River Ravensbourne; Conington Road asks that access to the river should be improved; Engate Street states that development should act as a gateway to encourage the use of the ... River Ravensbourne; Lee High Road states that there are opportunities for improvements to the River Quaggy corridor; Lee High Road West states that links with the River Quaggy should be improved.</p> <p>The AAP is likely to have a positive effect.</p>	Y
Soc4	Community facilities	<p>The baseline shows that the stakeholder consultation identified a lack of sports/leisure facilities and that there is a lack of facilities for young people.</p> <p>The Plan proposes the development of a new major leisure centre, including a swimming pool (COM1) and promoted the development of a range of community, leisure and entertainment spaces, including a cinema (COM2). The Plan also requires major developments to prepare a social impact report to assess the leisure and community facility needs arising from proposals (COM5).</p> <p>Site specific proposals for Loampit Vale (OOP4) include a possible site for a new leisure centre, while other leisure facilities are considered for a number of the other sites, such as the Land South of the Shopping Centre and Endgate Street.</p> <p>The AAP is likely to have a positive effect.</p>	Y

Ref	Topic	Prediction of effects	Overall Policy assessment
Soc5	Heritage	<p>Development principles to protect the historic environment include the consideration of impact on traditional street patterns and historical urban forms. This includes considering the pressure of development on areas which may not be specifically protected but are considered to have historic value or contribute to local distinctiveness. There are also considerations, such as English Heritage's Save our Streets campaign, which includes a desire to de-clutter the street environment.</p> <p>The Ladywell Conservation Area protects the good quality historic buildings in the area around the former Police Station. Existing buildings include the Grade II listed Coroner's Court and Police Station, and Ladywell Playtower building.</p> <p>The plan states that tall buildings must not have an adverse visual impact on the character of Conservation Areas, the setting of listed buildings (URB1). The Plan states that the preservation and enhancement of the character of the Ladywell Conservation Area will be a primary consideration. These proposals largely address the objective, but there is no overall policy to protect the historic environment in the whole area.</p> <p>This will have a neutral effect.</p>	-
Soc6	Culture	<p>The cultural strategy (2002) refers to the following factors that influence culture: quality urban environments (including protection of heritage and provision of landmark buildings); cultural venues (e.g. library, leisure centre, theatres, art centres); increasing footfall and designing out crime to encourage cultural activity; competitively priced and attractive housing; encouraging creative businesses; and providing community spaces for the voluntary sector.</p> <p>The plan proposals aim to improve vitality and viability through improvements to the urban environment, evening economy, making Lewisham a safer place (SH2, SH8, URB6). These would all contribute towards cultural diversity. The Plan also includes a policy on travellers' sites.</p> <p>There are no other proposals for cultural venues and no proposals for creative businesses. The plan is likely to have a positive effect.</p>	Y
Soc7	Crime	<p>Secured by Design principles highlights the need for natural surveillance, the creation of active neighbourhoods and the avoidance of 'crime features' such as out of scale facilities.</p> <p>The plan proposals include: a policy to enhance community safety through the overlooking of entrances and exits and a requirement for developers to show how they have taken 'Secure by Design' into account (URB6). The Plan also promotes evening economy (SH2, SH8); the creation of active frontages (URB4).</p> <p>This is likely to have a positive effect.</p>	Y
Soc8	Education	<p>The baseline shows that, based on BVPI results for 2003/2004, Lewisham came 132nd out of 147 authorities examined in rank, for the percentage of pupils achieving A-C in more than 5 GCSE's. Over the last five years, standards in education, as shown by the Standard Assessment Tests (SATs), have also improved in respect of younger students in the area.</p> <p>The plan proposes a site for a new secondary school in Lewisham town centre (COM2). The Plan also includes a</p>	Y

Ref	Topic	Prediction of effects	Overall Policy assessment
		<p>requirement for major developments to prepare a social impact report to assess the education, leisure and community facility and infrastructure needs arising from a proposal (COM5). Finally the AAP states in policy IMP7 that major developments should contribute to education and training by incorporating schemes as part of their construction and on-going operations</p> <p>This will have a positive effect.</p>	
Soc9	Social inclusion	<p>The baseline shows that the results of the recent stakeholder consultation identified a key issue as being the need for access for elderly and disabled people in the town centre.</p> <p>The plan proposes improvement to the urban and pedestrian environment (URB2, URB6). Policy TRS1 states that "New development should seek to make provision for high standards of accessibility, storage and changing facilities for cyclists and pedestrians, including those with disabilities, in the town centre". There are proposals to allocate sites for retail, community and/or leisure uses (SH1). New retail provision will be more accessible due to new legislation.</p> <p>There are no other policies that seek to improve accessibility for elderly and disabled people. This is likely to have a positive effect.</p>	Y
Soc10	Road safety	<p>The baseline shows that the number of road accidents (serious/fatal) have been reduced. Between 2001-2002 reduction was 3.2% and between 2003-2004 reduction of 8.5%. The results of the recent stakeholder consultation identified problems with pedestrian safety, particularly in the high street (conflict with buses and pedestrians).</p> <p>The AAP proposes the improvement of the urban environment, including improvements to connections into and through the town centre, particularly for pedestrians (URB6). The Plan also promotes the enhancement and creation of new cyclist and pedestrian routes and site specific measures to mitigate against the impact of roads and roundabouts (TRS3, TRS4).</p> <p>The plan proposes site specific measures including: the introduction of new crossings and routes into the town centre (OPP2a); redevelopment of the pedestrian environment by replacing the current roundabout arrangement with a signified junction in the land south of the Shopping Centre (OPP2f) and requires investigation into ways of improving the pedestrian environment in Lewisham High Street and Market, the Lee High Road and Jerrard Street.</p> <p>This is likely to have a positive effect.</p>	Y
Soc11	Health	<p>Many aspects of spatial planning have potential effects on human health. This includes: providing safe and convenient parks to allow physical activity, housing quality, access to work, community safety, social cohesion, air quality, provision of public services and climate change. Many of these aspects are addressed by other sustainability objectives. The factors addressed by this objective include: access to public services and promotion of healthy lifestyles (including access to healthy foods).</p> <p>The Plan includes a requirement for major developments to prepare a social impact report to assess the health, education, leisure and community facility and infrastructure needs arising from a proposal (COM5, IMP3). Policy COM1 proposes the creation of a major leisure centre including a swimming pool in Lewisham town centre. The Plan includes a</p>	-

Ref	Topic	Prediction of effects	Overall Policy assessment
		<p>number of policies that seek to promote cycling and walking (HSG7, URB2, URB6, TRS1IMP6) and the creation of new open space.</p> <p>This is likely to have a neutral effect as no specific reference is made to the development of new health services.</p>	
Soc12	Noise	<p>Based on the Quality of Life survey conducted in 2004, road traffic and road works noise are the most problematic types of noise for Lewisham residents at 49%.</p> <p>The AAP proposals are likely to generate more construction activity and therefore have a negative potential short to medium-term impact on noise pollution. The proposals to improve accessibility to public transport and reduce the dependency on the private car may help to reduce car trips that contribute towards traffic congestion. This would, in turn, help to reduce noise pollution from transport. The AAP also seeks to promote developments that will benefit the evening economy, which might be a source of additional noise; policy SH8 does require developers to address this issue however.</p> <p>The construction activity is likely to have a negative effect in the short to medium-term and a positive effect in the long-term due to likely reductions in traffic congestion.</p>	N
Soc13	Open space	<p>The baseline shows that the results of the recent stakeholder consultation identified a key issue as being access to open and green space.</p> <p>The plan proposals: enhancement of the public realm (URB6, SH2, IMP3); improvements to existing open space, where required (OS3), inclusion of amenity space for residential developments (HSG5) and the enhancement of the environment and access to the rivers, including the creation of a Confluence Park (OS2) Site specific proposals include new open space on the axis of Coldbath Street and Conington Road and new open space on the site of the existing Albion Road surface car park.</p> <p>This will have a positive effect.</p>	Y
Env1	Flood Risk	<p>The baseline shows that Lewisham households are at high risk of damage from flooding as a result of climate change. A significant proportion of the Borough lies in the floodplain of River Ravensbourne and River Quaggy. This means that a greater land areas is at risk from flooding, the floods are likely to occur more frequently and the cost of any single flood event will be higher than in the past.</p> <p>The plan states that developments on the floodplain will not normally be permitted unless they can effectively demonstrate to not increase the risk of flooding (ENV2). The Plan seeks to enhance the river corridors and promotes uses along the river (OS2); the policies do address the issue of flood risk and require developers to undertake flood risk assessments (URB2) and provide adequate flood protection (URB2) including green and brown roofs and sustainable urban drainage systems (OS3, URB2).</p> <p>This is likely to have a positive effect.</p>	Y

Ref	Topic	Prediction of effects	Overall Policy assessment
Env2	Sustainable transport	<p>The baseline shows that, according to the State of the Borough report, Lewisham has one of the lowest proportions of people in the country travelling to work by car; the 9th highest proportion travelling to work by public transport both nationally and regionally; but a low proportion walking or cycling to work. Lewisham has a lower percentage of people walking or cycling to work, in comparison to the London average.</p> <p>The plan proposes car-free housing developments (HSG8), reduced parking standards and good pedestrian and cycle access (TRS1). The Plan also states that developments will be required to submit a Travel Plan (TRS5). Site specific proposals include the provision of a cycle route in the land east of Jerrard Street (OPP4f) and the improvement of the pedestrian environment in most of the areas. The Plan will generate new residential and commercial developments, which will inevitably generate more traffic. The Plan does however; promote sustainable transport through the reduced standards for parking spaces and the improvements to the cyclist and pedestrian environment.</p> <p>This is likely to have a positive effect.</p>	Y
Env3	Renewable energy	<p>The AAP proposes new developments, some of which will have to comply with the GLA renewables target. The Council does not have more stringent targets than the GLA for renewable energy so there would be no additional benefit from the proposed development. The impact of the plan is considered to be neutral. The extent to which this objective is achieved depends strongly on implementation.</p>	-
Env4	Energy efficiency	<p>The AAP is proposing new development which would be constructed to higher standards of energy efficiency compared to existing dwellings, in accordance with the updated Building Regulations. The AAP does not set any higher standards.</p> <p>This is likely to have a neutral effect.</p>	-
Env5	Waste and recycling	<p>In the short term, there will be construction and demolition activities which will generate waste. In the medium term, the reduction in household waste is an operation issue. This can be encouraged through the provision of facilities for household and business waste management, but the impact of this depends heavily on implementation.</p> <p>The AAP is proposing an increase in high density housing, which is likely to increase the volume of waste generated. Policy URB2 requires developers to prepare Waste Management Plans for both construction and occupation stages. The extent to which this objective is achieved depends strongly on implementation.</p> <p>This is likely to have a negative effect in the short term with the medium to long-term effects depending on implementation.</p>	N
Env6	Water use	<p>The AAP proposals include more intense development which is likely to increase water use. However, re-development presents an opportunity to install equipment and measures that reduce water use. This is largely a matter of implementation through detailed design.</p> <p>The plan promotes the protection and conservation of water supplies including minimisation of treated water, maximisation of harvesting opportunities and incorporation of grey water recycling systems.</p> <p>The Plan proposals are likely to have a neutral impact. The extent to which this objective is achieved depends strongly on implementation.</p>	-

Ref	Topic	Prediction of effects	Overall Policy assessment
Env7	Air quality	<p>The AAP proposals are likely to generate more construction activity and therefore have a negative potential short to medium-term impact on air pollution. The proposals to improve accessibility to public transport may help to reduce car trips that contribute towards traffic congestion. This would, in turn, help to reduce air pollution from transport.</p> <p>The construction activity is likely to have a negative effect in the short to medium-term and a positive effect due to likely reductions in traffic congestion.</p>	-
Env8	Biodiversity	<p>The baseline shows that there are opportunities to address biodiversity in the built environment through the provision of habitat areas such as the protection and enhancement of habitats on rail-side land, the river environment and provision of green roofs etc. There are areas outside the boundary of the plan with ecological value, such as Hilly Fields and New Cross Gate cutting.</p> <p>Lewisham's Biodiversity Action Plan states: 'Well-vegetated linesides will act as `green corridors' and the combined network of railways will help to permit movement of some species along them between adjoining sites'. The BAP also states that: 'that all new developments beside the ... non-tidal rivers (included underground rivers) incorporate habitat enhancements'.</p> <p>The AAP proposes the enhancement of Lewisham's waterways but addresses the need for developments in close proximity to the rivers to respect and enhance natural habitats (URB7). The Plan also encourages the use of green and brown roofs (OS3), while policies OS3 and ENV1 require new development to protect and enhance the biodiversity of existing and new open spaces.</p> <p>This is likely to have a slight positive effect.</p>	Y
Env9	Water environment	<p>The Ravensbourne (Quaggy) is the most engineered river in the Greater London area, and along much of its course is culverted, channelled or covered.</p> <p>The plan includes a number of policies to ensure new developments will contribute to the protection and enhancement of the river environment (URB7, URB2, SH7, OS2, ENV1). The AAP promotes the improvement of access to the river, the creation of an attractive waterfront, which will enhance the natural habitat of the locality while accommodating appropriate flood defences.</p> <p>The site specific policies make reference to access to rivers and to enhancements. In particular: Loampit Vale South asks for proposals to interact with the River Ravensbourne; Conington Road asks that access to the river should be improved; Engate Street states that development should act as a gateway to encourage the use of the ... River Ravensbourne; Lee High Road states that there are opportunities for improvements to the River Quaggy corridor; Lee High Road West states that links with the River Quaggy should be improved.</p> <p>The AAP is likely to have a positive effect.</p>	Y
Eco1	Retail offer	<p>The plan proposes allocation of new sites for retail development (SH1). Planned provision of retail that takes account of the public and private transport capacity is likely to have a positive effect. The Plan policies seek to increase the vitality and viability of the town centre by providing a greater mix of uses, as well as improvements to the Lewisham Market (SH2) and the creation of a secondary focus of activity (SH3).</p>	Y



Ref	Topic	Prediction of effects	Overall Policy assessment
		This is likely to have a positive effect.	
Eco2	Evening economy	The plan proposes: a greater mix of uses, including cafes, bars and other evening economy uses (SH2); and allocates four primary areas for development of evening economy uses (SH8).  This is likely to have a positive effect.	Y
Eco3	Local business	The Plan proposes the increase in the amount of retail floorspace in the area (SH1) and promotes a mix of uses, including evening economy uses (SH8), A1 shops, community uses or amusement centres (SH6), large retail units (SH7). Policy EMP1 however allows for the conversion of existing employment uses to a mix of uses including residential. Policy EMP2 seeks to promote new commercial development specifically allocated to the town centre.  This is thought to have a neutral effect, as while retail uses are promoted, the Plan fails to strongly promote other commercial uses, including office developments.	-
Eco4	Employment opportunities	The plan proposes: retention of current office provision and employment uses within Lewisham Town Centre and to identify the town centre as the most appropriate location for new office development (EMP2). The Plan is likely to have a positive effect in the short term, with developers required to provide employment and training opportunities to local people in construction related industries associated with development (IMP7). However the Plan also allows for the conversion of office accommodation to a mix of uses including residential (EMP1)  This is likely to have a neutral effect on provision of employment opportunities.	-

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

Assessment of Housing												
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts / risks are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	y	yy		y	y		people			yy	positive
Soc2	To increase the provision of housing that meets decent homes standards	y	yy			y		people, sites, buildings			yy	positive
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	-	-					people, flora, fauna, global ecosphere			-	
Soc4	To increase the provision of accessible and inclusive everyday facilities	-	-					people			-	
Soc5	To protect and enhance heritage buildings	n	n			y		sites, buildings, etc. & their settings	y		n	negative
Soc6	To protect and enhance cultural diversity	?	y					people			y	
Soc7	To reduce crime levels in the town centre	y	y	y		y		people		y	y	
Soc8	To increase access to lifelong learning	-	-					people			-	
Soc9	To improve access to amenities for vulnerable members of the community.	?	?			y		people	y		?	
Soc10	To improve pedestrian safety in the town centre	y	y			y		people			y	
Soc11	To improve inclusive access to local healthcare facilities	?	?			y		people, flora, fauna, global ecosphere	y	y	?	
Soc12	To reduce noise from road traffic, construction and industry	n	?	y		y	y	people, flora, fauna, global ecosphere	y	y	n	negative
Soc13	To increase the quality and provision of publically accessible open spaces	y	y		y	y		people, flora, fauna, global ecosphere			y	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	-					people, flora, fauna, global ecosphere			-	
Env2	To reduce dependancy on private cars	?	y	y		y	y	people, flora, fauna, global ecosphere	y	y	y	positive
Env3	To increase on-site renewable energy provision	?	?					sites, buildings			?	
Env4	To increase the energy efficiency performance of existing buildings	?	?					sites, buildings			?	
Env5	To increase the amount of waste recycling	n	?	y		y		global ecosphere	y	y	n	negative
Env6	To provide sustainable sources of water	n	?	y		y		global ecosphere	y	y	n	negative
Env7	To improve air quality	n	?	y		y		people, global ecosphere	y	y	n	negative
Env8	To value, protect and enhance biodiversity	-	-					flora, fauna, global ecosphere			-	
Env9	To protect, manage and enhance the Rivers and associated habitats	-	-					people, global ecosphere			-	
Eco1	To increase the diversity of the retail offer	y	y			y		people			y	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	y	y			y		people			y	
Eco4	To increase access to local employment	y	y			y		people			y	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

Assessment of Shopping & Town Centre												
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	y	y			y		people			y	
Soc2	To increase the provision of housing that meets decent homes standards	y	y			y		people, sites, buildings			y	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	-	y			y		people, flora, fauna, global ecosphere			y	
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	y			y		people			y	
Soc5	To protect and enhance heritage buildings	n	n					sites, buildings, etc. & their settings	y		n	
Soc6	To protect and enhance cultural diversity	-	-					people			-	
Soc7	To reduce crime levels in the town centre	y	yy			y	y	people		y	yy	positive
Soc8	To increase access to lifelong learning	-	-					people			-	
Soc9	To improve access to amenities for vulnerable members of the community.	-	-					people			-	
Soc10	To improve pedestrian safety in the town centre	-	-					people			-	
Soc11	To improve inclusive access to local healthcare facilities	?	?			y		people, flora, fauna, global ecosphere	y	y	?	
Soc12	To reduce noise from road traffic, construction and industry	n	n			y	y	people, flora, fauna, global ecosphere	y	y	n	negative
Soc13	To increase the quality and provision of publically accessible open spaces	y	y			y		people, flora, fauna, global ecosphere			y	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	n	?	y		y	y	people, flora, fauna, global ecosphere	y		n	negative
Env2	To reduce dependancy on private cars	?	?					people, flora, fauna, global ecosphere			?	
Env3	To increase on-site renewable energy provision	?	?					sites, buildings			?	
Env4	To increase the energy efficiency performance of existing buildings	y	y			y		sites, buildings			y	
Env5	To increase the amount of waste recycling	n	?	y		y	y	global ecosphere		y	n	
Env6	To provide sustainable sources of water	n	?			y	y	global ecosphere		y	n	
Env7	To improve air quality	n	?	y		y	y	people, global ecosphere		y	n	
Env8	To value, protect and enhance biodiversity	-	-					flora, fauna, global ecosphere			-	
Env9	To protect, manage and enhance the Rivers and associated habitats	n	?			y		people, global ecosphere			n	
Eco1	To increase the diversity of the retail offer	y	yy			y		people			yy	positive
Eco2	To encourage a vibrant, well-managed evening economy	y	yy			y		people			yy	positive
Eco3	To increase density of local business	y	yy		y	y		people			yy	positive
Eco4	To increase access to local employment	y	y		y	y		people			y	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

		Assessment of Urban Design										
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	?	?					people			?	
Soc2	To increase the provision of housing that meets decent homes standards	y	y			y		people, sites, buildings			y	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	y	yy		y	y		people, flora, fauna, global ecosphere	y		yy	positive
Soc4	To increase the provision of accessible and inclusive everyday facilities	?	y					people			y	
Soc5	To protect and enhance heritage buildings	y	y			y		sites, buildings, etc. & their settings	y		y	positive
Soc6	To protect and enhance cultural diversity	?	?					people			?	
Soc7	To reduce crime levels in the town centre	y	yy			y	y	people		y	yy	positive
Soc8	To increase access to lifelong learning	?	?					people			?	
Soc9	To improve access to amenities for vulnerable members of the community.	?	?					people			?	
Soc10	To improve pedestrian safety in the town centre	?	y		y	y		people			y	
Soc11	To improve inclusive access to local healthcare facilities	?	?					people, flora, fauna, global ecosphere			?	
Soc12	To reduce noise from road traffic, construction and industry	n	n			y	y	people, flora, fauna, global ecosphere	y		n	negative
Soc13	To increase the quality and provision of publically accessible open spaces	y	y		y	y		people, flora, fauna, global ecosphere			y	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	y	y			y	y	people, flora, fauna, global ecosphere	y		y	positive
Env2	To reduce dependency on private cars	?	y			y		people, flora, fauna, global ecosphere			y	
Env3	To increase on-site renewable energy provision	?	?					sites, buildings			?	
Env4	To increase the energy efficiency performance of existing buildings	?	?					sites, buildings			?	
Env5	To increase the amount of waste recycling	?	y	y				global ecosphere		y	y	
Env6	To provide sustainable sources of water	?	y	y		y		global ecosphere		y	y	
Env7	To improve air quality	n	y	y		y	y	people, global ecosphere		y	y	
Env8	To value, protect and enhance biodiversity	y	y			y		flora, fauna, global ecosphere	y		y	positive
Env9	To protect, manage and enhance the Rivers and associated habitats	y	y				y	people, global ecosphere	y		y	
Eco1	To increase the diversity of the retail offer	y	y			y		people			y	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	y	y			y		people			y	
Eco4	To increase access to local employment	y	y			y		people			y	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

ASO	Sustainability Objective	Assessment of Employment										
		Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	?	?					people			?	
Soc2	To increase the provision of housing that meets decent homes standards	y	y			y		people, sites, buildings			y	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	-	-					people, flora, fauna, global ecosphere			-	
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	y			y		people			y	
Soc5	To protect and enhance heritage buildings	n	?			y		sites, buildings, etc. & their settings	y		n	negative
Soc6	To protect and enhance cultural diversity	-	-					people			-	
Soc7	To reduce crime levels in the town centre	-	-					people			-	
Soc8	To increase access to lifelong learning	?	?					people			?	
Soc9	To improve access to amenities for vulnerable members of the community.	-	-					people			-	
Soc10	To improve pedestrian safety in the town centre	-	-					people			-	
Soc11	To improve inclusive access to local healthcare facilities	?	?					people, flora, fauna, global ecosphere	y		?	
Soc12	To reduce noise from road traffic, construction and industry	n	n			y	y	people, flora, fauna, global ecosphere		y	n	
Soc13	To increase the quality and provision of publically accessible open spaces	-	-					people, flora, fauna, global ecosphere			-	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	-					people, flora, fauna, global ecosphere			-	
Env2	To reduce dependency on private cars	-	-					people, flora, fauna, global ecosphere			-	
Env3	To increase on-site renewable energy provision	?	?					sites, buildings			?	
Env4	To increase the energy efficiency performance of existing buildings	y	y			y		sites, buildings			y	
Env5	To increase the amount of waste recycling	n	?			y		global ecosphere		y	n	
Env6	To provide sustainable sources of water	n	?			y		global ecosphere		y	n	
Env7	To improve air quality	?	?			y	y	people, global ecosphere	y	y	?	
Env8	To value, protect and enhance biodiversity	-	-					flora, fauna, global ecosphere			-	
Env9	To protect, manage and enhance the Rivers and associated habitats	-	-					people, global ecosphere			-	
Eco1	To increase the diversity of the retail offer	y	y			y		people			y	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	?	?					people			?	
Eco4	To increase access to local employment	nn	n			y		people			nn	negative

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

		Assessment of Open Space										
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	-					people			-	
Soc2	To increase the provision of housing that meets decent homes standards	-	-					people, sites, buildings			-	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	y	yy		y	y		people, flora, fauna, global ecosphere			yy	positive
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	y			y		people			y	
Soc5	To protect and enhance heritage buildings	-	-					sites, buildings, etc. & their settings			-	
Soc6	To protect and enhance cultural diversity	-	-					people			-	
Soc7	To reduce crime levels in the town centre	?	?					people			?	
Soc8	To increase access to lifelong learning	-	-					people			-	
Soc9	To improve access to amenities for vulnerable members of the community.	-	-					people			-	
Soc10	To improve pedestrian safety in the town centre	-	-					people			-	
Soc11	To improve inclusive access to local healthcare facilities	-	-					people, flora, fauna, global ecosphere			-	
Soc12	To reduce noise from road traffic, construction and industry	-	-					people, flora, fauna, global ecosphere			-	
Soc13	To increase the quality and provision of publically accessible open spaces	y	yy		y	y	y	people, flora, fauna, global ecosphere			yy	positive
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	?	y			y		people, flora, fauna, global ecosphere			y	
Env2	To reduce dependency on private cars	-	-					people, flora, fauna, global ecosphere			-	
Env3	To increase on-site renewable energy provision	-	-					sites, buildings			-	
Env4	To increase the energy efficiency performance of existing buildings	-	-					sites, buildings			-	
Env5	To increase the amount of waste recycling	-	-					global ecosphere			-	
Env6	To provide sustainable sources of water	-	-					global ecosphere			-	
Env7	To improve air quality	?	y				y	people, global ecosphere		y	y	
Env8	To value, protect and enhance biodiversity	y	y			y		flora, fauna, global ecosphere		y	y	
Env9	To protect, manage and enhance the Rivers and associated habitats	y	yy		y	y		people, global ecosphere			yy	positive
Eco1	To increase the diversity of the retail offer	-	-					people			-	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	-	-					people			-	
Eco4	To increase access to local employment	-	-					people			-	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

		Assessment of Transport										
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	-					people			-	
Soc2	To increase the provision of housing that meets decent homes standards	-	-					people, sites, buildings			-	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	y	y			y	y	people, flora, fauna, global ecosphere			y	
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	y			y	y	people			y	
Soc5	To protect and enhance heritage buildings	-	-					sites, buildings, etc. & their settings			-	
Soc6	To protect and enhance cultural diversity	-	-					people			-	
Soc7	To reduce crime levels in the town centre	-	-					people			-	
Soc8	To increase access to lifelong learning	-	-					people			-	
Soc9	To improve access to amenities for vulnerable members of the community.	y	y			y	y	people	y		y	positive
Soc10	To improve pedestrian safety in the town centre	y	y			y		people			y	
Soc11	To improve inclusive access to local healthcare facilities	-	-					people, flora, fauna, global ecosphere			-	
Soc12	To reduce noise from road traffic, construction and industry	n	?			y		people, flora, fauna, global ecosphere		y	n	
Soc13	To increase the quality and provision of publically accessible open spaces	-	-					people, flora, fauna, global ecosphere			-	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	-					people, flora, fauna, global ecosphere			-	
Env2	To reduce dependency on private cars	y	yy			y		people, flora, fauna, global ecosphere			yy	positive
Env3	To increase on-site renewable energy provision	-	-					sites, buildings			-	
Env4	To increase the energy efficiency performance of existing buildings	-	-					sites, buildings			-	
Env5	To increase the amount of waste recycling	-	-					global ecosphere			-	
Env6	To provide sustainable sources of water	-	-					global ecosphere			-	
Env7	To improve air quality	?	y	y				people, global ecosphere		y	y	
Env8	To value, protect and enhance biodiversity	-	-					flora, fauna, global ecosphere			-	
Env9	To protect, manage and enhance the Rivers and associated habitats	y	y			y		people, global ecosphere			y	
Eco1	To increase the diversity of the retail offer	y	y			y		people			y	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	-	-					people			-	
Eco4	To increase access to local employment	-	-					people			-	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

		Assessment of Environment										
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	-					people			-	
Soc2	To increase the provision of housing that meets decent homes standards	-	-					people, sites, buildings			-	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	y	yy			y		people, flora, fauna, global ecosphere	y		yy	positive
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	y			y		people			y	
Soc5	To protect and enhance heritage buildings	-	-					sites, buildings, etc. & their settings			-	
Soc6	To protect and enhance cultural diversity	-	-					people			-	
Soc7	To reduce crime levels in the town centre	-	-					people			-	
Soc8	To increase access to lifelong learning	-	-					people			-	
Soc9	To improve access to amenities for vulnerable members of the community.	-	-					people			-	
Soc10	To improve pedestrian safety in the town centre	-	-					people			-	
Soc11	To improve inclusive access to local healthcare facilities	-	-					people, flora, fauna, global ecosphere			-	
Soc12	To reduce noise from road traffic, construction and industry	-	-					people, flora, fauna, global ecosphere			-	
Soc13	To increase the quality and provision of publically accessible open spaces	y	yy		y	y		people, flora, fauna, global ecosphere			yy	positive
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	y	yy			y	y	people, flora, fauna, global ecosphere	y	y	yy	positive
Env2	To reduce dependancy on private cars	-	-					people, flora, fauna, global ecosphere			-	
Env3	To increase on-site renewable energy provision	-	-					sites, buildings			-	
Env4	To increase the energy efficiency performance of existing buildings	-	-					sites, buildings			-	
Env5	To increase the amount of waste recycling	-	-					global ecosphere			-	
Env6	To provide sustainable sources of water	-	-					global ecosphere			-	
Env7	To improve air quality	y	y			y		people, global ecosphere			y	
Env8	To value, protect and enhance biodiversity	y	yy			y		flora, fauna, global ecosphere	y	y	yy	positive
Env9	To protect, manage and enhance the Rivers and associated habitats	yy	yy			y		people, global ecosphere	y	y	yy	positive
Eco1	To increase the diversity of the retail offer	-	-					people			-	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	-	-					people			-	
Eco4	To increase access to local employment	-	-					people			-	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------



Assessment of Community & Leisure												
ASO	Sustainability Objective	Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	-					people			-	
Soc2	To increase the provision of housing that meets decent homes standards	-	-					people, sites, buildings			-	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	-	-					people, flora, fauna, global ecosphere			-	
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	yy		y	y		people			yy	positive
Soc5	To protect and enhance heritage buildings	-	-					sites, buildings, etc. & their settings			-	
Soc6	To protect and enhance cultural diversity	?	y			y		people			y	
Soc7	To reduce crime levels in the town centre	-	-					people			-	
Soc8	To increase access to lifelong learning	y	yy		y	y		people			yy	positive
Soc9	To improve access to amenities for vulnerable members of the community.	y	y					people	y		y	
Soc10	To improve pedestrian safety in the town centre	?	?					people			?	
Soc11	To improve inclusive access to local healthcare facilities	?	y			y		people, flora, fauna, global ecosphere	y		y	positive
Soc12	To reduce noise from road traffic, construction and industry	?	?					people, flora, fauna, global ecosphere			?	
Soc13	To increase the quality and provision of publically accessible open spaces	-	-					people, flora, fauna, global ecosphere			-	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	-					people, flora, fauna, global ecosphere			-	
Env2	To reduce dependancy on private cars	?	y			y		people, flora, fauna, global ecosphere		y	y	
Env3	To increase on-site renewable energy provision	?	?					sites, buildings			?	
Env4	To increase the energy efficiency performance of existing buildings	?	?					sites, buildings			?	
Env5	To increase the amount of waste recycling	n	?					global ecosphere			n	
Env6	To provide sustainable sources of water	n	?					global ecosphere			n	
Env7	To improve air quality	?	?					people, global ecosphere			?	
Env8	To value, protect and enhance biodiversity	-	-					flora, fauna, global ecosphere			-	
Env9	To protect, manage and enhance the Rivers and associated habitats	-	-					people, global ecosphere			-	
Eco1	To increase the diversity of the retail offer	y	y			y		people			y	
Eco2	To encourage a vibrant, well-managed evening economy	y	y			y		people			y	
Eco3	To increase density of local business	y	y			y		people			y	
Eco4	To increase access to local employment	y	y			y		people			y	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

ASO	Sustainability Objective	Assessment of Implementation										
		Will there be +ve short term impacts	Will there be +ve long term impacts	Large scale impacts?	Permanent impacts?	Impacts are likely?	Impacts are frequent / constant?	Receptor(s)	Sensitive receptor(s)?	Cumulative effects?	Overall impact	Significant?
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	-	-					people			-	
Soc2	To increase the provision of housing that meets decent homes standards	-	-					people, sites, buildings			-	
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	yy	yy		y	y		people, flora, fauna, global ecosphere			yy	positive
Soc4	To increase the provision of accessible and inclusive everyday facilities	y	yy		y	y		people			yy	positive
Soc5	To protect and enhance heritage buildings	-	-					sites, buildings, etc. & their settings			-	
Soc6	To protect and enhance cultural diversity	?	?					people			?	
Soc7	To reduce crime levels in the town centre	-	-					people			-	
Soc8	To increase access to lifelong learning	y	y		y	y		people			y	
Soc9	To improve access to amenities for vulnerable members of the community.	?	?					people	y		?	
Soc10	To improve pedestrian safety in the town centre	y	y			y		people			y	
Soc11	To improve inclusive access to local healthcare facilities	y	y			y		people, flora, fauna, global ecosphere	y		y	positive
Soc12	To reduce noise from road traffic, construction and industry	?	?					people, flora, fauna, global ecosphere			?	
Soc13	To increase the quality and provision of publically accessible open spaces	y	y		y	y		people, flora, fauna, global ecosphere			y	
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	-	-					people, flora, fauna, global ecosphere			-	
Env2	To reduce dependency on private cars	y	y			y		people, flora, fauna, global ecosphere		y	y	
Env3	To increase on-site renewable energy provision	?	?					sites, buildings			?	
Env4	To increase the energy efficiency performance of existing buildings	?	?					sites, buildings			?	
Env5	To increase the amount of waste recycling	n	?			y		global ecosphere			n	
Env6	To provide sustainable sources of water	n	?			y		global ecosphere			n	
Env7	To improve air quality	?	?					people, global ecosphere			?	
Env8	To value, protect and enhance biodiversity	-	-					flora, fauna, global ecosphere			-	
Env9	To protect, manage and enhance the Rivers and associated habitats	-	-					people, global ecosphere			-	
Eco1	To increase the diversity of the retail offer	-	-					people			-	
Eco2	To encourage a vibrant, well-managed evening economy	-	-					people			-	
Eco3	To increase density of local business	-	-					people			-	
Eco4	To increase access to local employment	y	?			y		people			y	

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

Assessment of the Impacts of the Preferred Policies in the Area Action Plan												
ASO	Sustainability Objective	Short Term	Long Term	Housing	Shopping & Town Centre	Urban Design	Employment	Open Space	Transport	Environment	Community & Leisure	Implementation
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	YY	YY	yy	y	?	?	-	-	-	-	-
Soc2	To increase the provision of housing that meets decent homes standards	YY	YY	yy	y	y	y	-	-	-	-	-
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	YY	YY	-	y	yy	-	yy	y	yy	-	yy
Soc4	To increase the provision of accessible and inclusive everyday facilities	Y	Y	-	y	y	y	y	y	y	yy	yy
Soc5	To protect and enhance heritage buildings	N	N	n	n	y	n	-	-	-	-	-
Soc6	To protect and enhance cultural diversity	?	?	y	-	?	-	-	-	-	y	?
Soc7	To reduce crime levels in the town centre	YY	YY	y	yy	yy	-	?	-	-	-	-
Soc8	To increase access to lifelong learning	Y	?	-	-	?	?	-	-	-	yy	y
Soc9	To improve access to amenities for vulnerable members of the community.	?	?	?	-	?	-	-	y	-	?	?
Soc10	To improve pedestrian safety in the town centre	Y	Y	y	-	y	-	-	y	-	?	y
Soc11	To improve inclusive access to local healthcare facilities	?	?	?	?	?	?	-	-	-	y	y
Soc12	To reduce noise from road traffic, construction and industry	NN	N	n	n	n	n	-	n	-	?	?
Soc13	To increase the quality and provision of publically accessible open spaces	YY	YY	y	y	y	-	yy	-	yy	-	y
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	Y	Y	-	n	y	-	y	-	yy	-	-
Env2	To reduce dependancy on private cars	Y	Y	y	?	y	-	-	yy	-	y	y
Env3	To increase on-site renewable energy provision	?	?	?	?	?	?	-	-	-	?	?
Env4	To increase the energy efficiency performance of existing buildings	Y	?	?	y	?	y	-	-	-	?	?
Env5	To increase the amount of waste recycling	N	?	n	n	y	n	-	-	-	n	n
Env6	To provide sustainable sources of water	N	?	n	n	y	n	-	-	-	n	n
Env7	To improve air quality	N	?	n	n	y	?	y	y	y	?	?
Env8	To value, protect and enhance biodiversity	Y	Y	-	-	y	-	y	-	yy	-	-
Env9	To protect, manage and enhance the Rivers and associated habitats	YY	YY	-	n	y	-	yy	y	yy	-	-
Eco1	To increase the diversity of the retail offer	YY	YY	y	yy	y	y	-	y	-	y	-
Eco2	To encourage a vibrant, well-managed evening economy	Y	YY	-	yy	-	-	-	-	-	y	-
Eco3	To increase density of local business	Y	YY	y	yy	y	?	-	-	-	y	-
Eco4	To increase access to local employment	Y	?	y	y	y	nn	-	-	-	y	y

yy	Significant positive contribution	y	Positive contribution	-	Neutral contribution	n	Negative contribution	nn	Significant negative contribution	?	Unknown contribution
----	-----------------------------------	---	-----------------------	---	----------------------	---	-----------------------	----	-----------------------------------	---	----------------------

Assessment of the Significance of the Preferred Policies in the Area Action Plan												
ASO	Sustainability Objective	Short Term	Long Term	Housing	Shopping & Town Centre	Urban Design	Employment	Open Space	Transport	Environment	Community & Leisure	Implementation
Soc1	To increase the provision of high quality affordable homes with good connectivity to public transport	Positive	Positive	Positive								
Soc2	To increase the provision of housing that meets decent homes standards	Positive	Positive	Positive								
Soc3	To increase recreational access to the Quaggy and Ravensbourne rivers	Positive	Positive			Positive		Positive		Positive		Positive
Soc4	To increase the provision of accessible and inclusive everyday facilities	Positive	Positive								Positive	Positive
Soc5	To protect and enhance heritage buildings	?	?	Negative		Positive	Negative					
Soc6	To protect and enhance cultural diversity											
Soc7	To reduce crime levels in the town centre	Positive	Positive		Positive	Positive						
Soc8	To increase access to lifelong learning	Positive	?								Positive	
Soc9	To improve access to amenities for vulnerable members of the community.	?	?						Positive			
Soc10	To improve pedestrian safety in the town centre											
Soc11	To improve inclusive access to local healthcare facilities	?	?								Positive	Positive
Soc12	To reduce noise from road traffic, construction and industry	Negative	?	Negative	Negative	Negative						
Soc13	To increase the quality and provision of publically accessible open spaces	Positive	Positive					Positive		Positive		
Env1	To manage the risk of flooding (including climate change) and reduce its effects.	?	Positive		Negative	Positive				Positive		
Env2	To reduce dependency on private cars	?	Positive	Positive					Positive			
Env3	To increase on-site renewable energy provision	?	?									
Env4	To increase the energy efficiency performance of existing buildings	?	?									
Env5	To increase the amount of waste recycling	Negative	?	Negative								
Env6	To provide sustainable sources of water	Negative	?	Negative								
Env7	To improve air quality	Negative	?	Negative								
Env8	To value, protect and enhance biodiversity	Positive	Positive			Positive				Positive		
Env9	To protect, manage and enhance the Rivers and associated habitats	Positive	Positive					Positive		Positive		
Eco1	To increase the diversity of the retail offer	Positive	Positive		Positive							
Eco2	To encourage a vibrant, well-managed evening economy	Positive	Positive		Positive							
Eco3	To increase density of local business	Positive	Positive		Positive							
Eco4	To increase access to local employment	?	?				Negative					

Positive contribution	Possible conflict	Neutral or N/A
-----------------------	-------------------	----------------

Assessment of Opportunity Area Policies																										
ASO	Soc1	Soc2	Soc3	Soc4	Soc5	Soc6	Soc7	Soc8	Soc9	Soc10	Soc11	Soc12	Soc13	Env1	Env2	Env3	Env4	Env5	Env6	Env7	Env8	Env9	Eco1	Eco2	Eco3	Eco4
LTCOPP1			y	y				y		y		n		t				n	n	t		y	y		y	y
LTCOPP1a				y	y		y					y	y		y	y	y					y				
LTCOPP2										y										y						
LTCOPP2a										y		n						n	n	t						
LTCOPP2b										y																
LTCOPP2c														y												
LTCOPP2d														y												
LTCOPP2e				y						y		n		y				n	n	t				y	y	
LTCOPP2f												n						n	n	t						
LTCOPP2g												n						n	n	t						
LTCOPP2h	y											n						n	n	n					y	y
LTCOPP2i										y														y	y	y
LTCOPP2j																							y	y	y	
LTCOPP3												n						n	n	n	y	y	y			
LTCOPP3a	y		y							y		n						n	n	n			y		y	y
LTCOPP3b	y		y									t						n	n	n						
LTCOPP3c													y													
LTCOPP4	y			y								n						n	n	n			y			
LTCOPP4a																										
LTCOPP4b	y			y								n	y					n	n	n						
LTCOPP4c	y			y								n						n	n	n			y			
LTCOPP4d	y											n						n	n	n				y	y	
LTCOPP4e	y											n						n	n	n					y	y
LTCOPP4f										y		n			y			n	n	t						
LTCOPP4g	y											n						n	n	n						
LTCOPP5			y									n	y	y				n	n	n			y		y	y
LTCOPP5a								y	y			n	y					n	n	n						
LTCOPP5b			y									n						n	n	n			y			
LTCOPP5c			y									n			y			n	n	n		y				
LTCOPP6	y			y								n						n	n	n			y			
LTCOPP6a	y											n						n	n	t			y	y	y	y

Positive contribution
Possible conflict
Negative contribution
Neutral or N/A



## Appendix C SA Objectives, Targets and Indicators

The following table sets out the SA objectives corresponding indicators, targets and sources of information. Results, trends and targets are included where available. This information was updated for the SA Scoping Report 2010, (Sustainability Appraisal Scoping Report of the Area Action Plan, Urban Practitioners 2010); consultation was carried out with the Statutory Bodies. All consultation responses were included in the SA of the Further Options Report Appendix 4. (Sustainability Appraisal of the Area Action Plan Urban Practitioners November 2010.)

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
<b>Social</b>							
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property prices (£)	Lewisham 2010 findaproperty.com	London 2010 Flats/Maisonettes South east in brackets)		Annual monitoring report Homelessness strategy
				Flats/ Maisonettes £356,752 (£163,198) £169,917	Terraced £482,520 (£204,975)		
				Terraced £226,461			
				Semi-Detached £313,429	Semi-Detached £545,439 (£247,868)		
				Detached £448,946	Detached £867,820 (£430,551)		
			Number of people applying for statutory homelessness				

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			Number of households in temporary accommodation				
			Number of housing completions	2008/09: 956	2001/02: 470 2002/03: 722 2003/04: 778 2004/05: 503 2005/06: 967 2006/07: 347 2007/08: 978	975 housing completions annually	
			Number of affordable housing completions	2008/09: 376	2005/06: 246 2006/07: 269 2007/08: 273 & 91 habitable rooms (off site)	429 affordable housing completions annually	
Soc 2	Decent homes	To increase the provision of housing that meets decent homes standards	Housing completed to Lifetime homes standard	2008/09: Lifetime Home standard: 157 dwellings granted	2007/08: Lifetime Home Standard: 1,182 dwellings granted	All homes built to Lifetime Homes targets	Annual monitoring report
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers	% of residents surveyed expressing satisfaction with the levels of recreational access to the river.				A natural renaissance for Lewisham , Lewisham Biodiversity Action Plan



Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			Length of riverside improved as part of new development				Environment Agency
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities	% of residents surveyed satisfied with the community facilities provision				Annual monitoring report
			Delivery of identified social infrastructure				
			Funding secured through S106			Maximise contributions	
Soc5	Heritage Environment	To protect and enhance heritage assets and their settings and utilise the historic environment in the creation of sustainable places	Levels of investment in retaining and maintaining listed buildings			Annual review of whether additional heritage assets should be listed	Annual monitoring report
			Condition of listed buildings in the local area				

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			No of buildings on/added/ removed from the English Heritage at risk register				
			Up to date conservation area appraisals and management plans for CA's within the AAP area				
Soc6	Culture	To protect and enhance cultural diversity					Lewisham Local Cultural Strategy  Creative Lewisham - Lewisham Cultural and Urban Development Commission
Soc7	Crime	To reduce crime levels in the town centre	Violent crimes per 1,000 population	2007/08: 41.1	2005/06: 34.3 2006/07: 44.9  Best Quartile 2006/07 England: 13.1 London: 21.95	2006/07: 41.8  2007/08: 22.9	ONS/ Metropolitan Police Service
Soc8	Education	To increase access to lifelong learning	People aged 16-74 with no qualifications	2008: 16,800 (9.5%) London: 12.0%	2007 Lewisham: 17,000 (9.7%) London: 12.8%	Year on year decrease	NOMIS Official Labour Market Statistics

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
				GB:12.4%	GB: 13.1%		Census KS13
			Percentage of pupils achieving 5 or more GCSEs at grades A* -C or equivalent	2007/08: 54.8%	2005/06: 49% 2006/07: 54.8%  2006/07 England: 61.8% London: 63.23%	Year on year increase	NI
			Number of learners completing adult basic skills programme	2005/06: 1,600	2003/04: 1,480 2004/05: 1,550	2009/10: 1,700	NI
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.	Funding secured through S106			Maximise contributions	Annual monitoring report
			Gain and losses of community and recreational facilities completed			No net loss	
			Delivery of identified social infrastructure			Delivery in accordance with IDP	
			Number of visits to libraries	2005/06: 6,222	2004/05: 6,018	2009/10: 7,780	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
Soc10	Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population serious or fatal				BVPI  London Borough of Lewisham
Soc11	Health	To improve inclusive access to local healthcare facilities	Mortality rate from circulatory diseases under age 75	102.94		2010/11: 70	LAA, NI 121
			Mortality rate from all cancers at age 75 or under	124.25		2010/11: 107	LAA, NI 122
			Health life expectancy at age 65	2001 11.2 (M) 13.5 (F)		2010/11: 13.8 (m) 15.8 (f)	LAA, NI 137, NHS Lewisham
Soc12	Noise	To reduce noise from road traffic, construction and industry	Noise complaints	2001/02: 8,147 noise complaints	2000/01: 7006	Reduction in noise complaints	LB Lewisham
Soc13	Open space	To increase the quality and provision of publically accessible open spaces	Number of applications granted or refused on designated open space	2008-09: 0	2007-08: 0	Minimise loss of open space and maximise gains	Annual monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			Number of applications within SINCs granted or refused planning permission	2008-09: 0	2007-08: 0		
			Amount of new open space provided as part of a new development	This is a new indicator and data will be collected from 2010/11			
<b>Environmental</b>							
Env 1	Effects of climate change	To ensure Lewisham town centre is resilient to climate change using mitigation and adaptation measures through sustainable design and construction	Number of homes achieving Code for Sustainable Homes level 4 or above granted and completed	This is a new indicator and data will be collected from the 2010/11 AMR		All housing built to CSH Level 4	Annual Monitoring report
			Carbon footprint of Lewisham	2008 11.84 tonnes CO2 per capita	Lewisham ranked 20 <sup>th</sup> out of 33 London Boroughs	Year on year improvement	Environment Agency and Stockholm Environment Institute
Env2	Flood Risk	To reduce the risk and effects of flooding	Number of permissions granted contrary to the advice of the Environment Agency	2008/09: 0	2005/06: 0 2006/07: 0 2007/08: 0	0	Annual Monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			Number of permissions granted contrary to the advice of the statutory water/sewerage undertaker on low pressure / flooding grounds	TBC	TBC	0	Annual Monitoring Report
			Number of properties signed up to Environment Agency Flood Warning Direct and Extended Direct Warning services	TBC	TBC	Year on year improvement	Environment Agency
			No and size of Living Roofs granted and completed	2008-09 Granted: 6 Completed: no data		Increase in the number of completed living walls and roofs	Annual Monitoring report
Env3	Sustainable transport	To reduce dependency on private cars	PTAL score of new development	High PTAL for Catford, Lewisham and parts of Deptford		Higher density development to be located within areas with a higher PTAL	TfL

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			No. of car clubs	2009/10: 8 section 106 agreements secured the provision of a 'car club'	This is a new indicator	Year on year increase	Annual Monitoring Report
			Proportion of journeys made on foot and cycle	2001: 2% (home to work trips)		To increase existing walking and cycle trips by 10% in 2012	Annual Monitoring Report
			No of new cycle facilities	This is a new indicator and data will be collected from 2010/11		All permitted development to include cycle facilities	Annual Monitoring Report
Env4	Renewable energy	To increase on-site renewable energy provision	No. and capacity of renewable energy granted and completed by type	2008/09 Completed: 4 Granted: 17 Photovoltaic Panel: 3 Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures:13	2007/08: No. of permission: 19 Photovoltaic Panel: 3 Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13 Other renewable energy measures: 9	Maximise renewable energy by type	Annual Monitoring Report Core E3

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
Env5	Energy efficiency	To increase the energy efficiency performance of existing buildings	BREEAM, Code for Sustainable Homes for other buildings	BREEAM 2008-09 Excellent Standard: 1 CSH – new indicator		BREEAM Excellent  CSH 4	Annual Monitoring report
			Per capita reductions in CO2	2008/09: 0	2005/06: 0 2006/07: 0 2007/08: 0	2011: 4,575 tonnes	LAA, NI 186 Defra LB Lewisham
Env6	Waste and recycling	To increase the amount of waste recycling	Percentage of waste recycled, reused or composted	2009/10: 16.8%	2008/09: 20.55%	25% waste recycled by 2012	Strategic Waste and Management, LBL
			Percentage of municipal waste sent to landfill	2009/10: 10.9%	2008/09: 3.72% 2007/08: 4.84% 2006/07: 9.47% 2005/06: 10.04% 2004/05: 10.46% 2003/04: 11.79%	Year on year reduction	Strategic Waste and Management, LBL
			Residual household waste per year	2009/10: 777kg	2008/09: 767.75kg	2009/10: 754kg 2010/11: 716kg	LAA, NI 191 Strategic Waste and Management LBL
Env7	Water quality and use	To provide sustainable sources of water	Promote grey water re-use and sustainable water use in new				Annual monitoring report



Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
			development				
			Water quality assessment				Environment Agency
Env8	Air quality	To improve air quality	Levels Exceeding Main Air Pollutant Quality Standards Level of NO2 and PM10			As per AQMA standards	Annual monitoring report London Air Quality archive
Env9	Nature conservation Maintain and enhance townscapes and landscapes	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies	Changes in population of selected species			Biodiversity Plan targets	Annual monitoring report
			Change in biological and chemical river quality	A and B (Good or better) Thames Region: 2008: 3.8%		No decrease in quality	
			Length of river restored/naturalised	2008: 200m Ladywell Fields		Length restored	
			Changes in biodiversity	2008/09 No Change	2007/08 Lowland beech and yew woodland: 0.00 ha Wet Woodland: 0.09 ha Lowland mixed deciduous woodland: 38.46ha Traditional orchards: 0.69	Maintain and enhance the current population of biodiversity importance	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
					ha Wood-pasture and parkland: no data available Hedgerows: 0.42ha Lowland meadows: 1.40ha Lowland calcareous grassland: 0.00ha Lowland dry acid grassland: 40.66ha Reedbeds: 0.00ha Coastal saltmarsh: 0.03ha Intertidal mudflats: 2.55ha Rivers: 19.39ha Eutrophic standard waters Ponds: 1.96ha Open mosaic habitats on previously developed land		
Env10		To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape	New and converted buildings on previously developed land	2008/09: 99% (1,097 dwellings out of 1,108 dwellings)	2007/08: 96.58% (1,045 out of 1,082)	To exceed 90% of dwellings provided on previously	Annual Monitoring Report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
						developed land	
			No. of schemes including contaminated land remediation granted or completed				
			Amount of SINC land			No decrease in SINC land	
<b>Economic</b>							
Eco1	Retail offer	To increase the diversity of the retail offer	Amount of completed retail floorspace  Number of different retail functions and types accommodated in the area	2008/09 Gross B1(a): 508 m2 A1: 2,940 m2 A2: 269 m2 A3: 716 m2 A4: 0 m2 A5: 243 m2 D2: 803 m2 Net B1(a): 458 m2 A1: 1,263 m2 A2: 189 m2 A3: 180 m2	2005/06: Gross: B1(a): 1,223 m2 A1: 1,189 m2 A2: 967m2 A3: 539 m2 A4: 0 m2 A5: 224 m2 D2: 77 m2 Net B1(a): no data A1: -65 m2 A2: 810 m2 A3: - 171 m2	40,000 sq. m by 2026	Annual Monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
				A4: -1,265 m2 A5: 243 m2 D2: 61 m2	A4: -870 m2 A5: 224 m2 D2: 77 m2 <b>2006/07:</b> <b>Gross</b> B1(a): 3,892 m2 A1: 635 m2 A2: 169 m2 A3: no data A4: no data A5: no data D2: 1,000 m2 <b>Net</b> B1(a): 3,102 m2 A1: 236 m2 A2: -390 m2 A3: -171 m2 A4: no data A5: 381 m2 D2: 885 m2 <b>2007/08</b> <b>Gross</b> B1(a): 665 m2 A1: 2,163 m2 A2: 500 m2 A3: 633 m2		

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
					A4: 340 m2 A5: 381 m2 D2: 7,103 m2 <b>Net</b> B1(a): 459 m2 A1: 265 m2 A2: -165 m2 A3: - 623 m2 A4: -70 m2 A5: 381 m2 D2: 5,218 m2		
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy	Evening economy – available floorspace  Amount of completed leisure and A3 floorspace	See above	See above	Increase in Lewisham Town centre	Annual Monitoring Report
Eco3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment	Percentage of town centre mixed use schemes			Increase year on year	Annual Monitoring Report
			Proportion of office and retail vacancy rates	2010 - 6,500 sqm retail vacancy (8%)	2010 average vacancy (national) = 11.5%	Decrease year on year	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
Eco4	Local business	To increase density of local business	New business registration rate	2007: 5,390 Registration: 850 Deregistration: 450	2004: 4,595  2006: 5,065	Year on year increase	Companies House
			Percentage of small businesses in an area showing employment growth	2006/07 10.6%		2009/10: 9.5% 2010/11: 9.5%	LAA, NI 172
			Amount of completed office floorspace	<b>2008/09</b> <b>Gross</b> B1: 1,775 m2 <b>Net</b> B1: -114 m2 See specific figures for A2, B1(a) above	<b>2005/06:</b> <b>Gross:</b> B1: 1,223 m2 <b>2006/07:</b> <b>Gross:</b> B1: 3,892 m2 2007/08 <b>Gross</b> B1: 1,209 m2 <b>Net</b> B1: -5,127 m2	No net loss	Annual Monitoring Report - Core BD1
			Job density	2008 Density: 0.43 (77,000 jobs)	2008 London: 0.94 GB: 0.83	No reduction	ONS/NOMIS

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source
Eco5	Employment opportunities	To increase access to local employment and reduce local unemployment	Employee jobs in Lewisham town centre	2008 Full-time: 62.2% (38,000) Part-time: 37.8% (23,100)	2008 London Full-time: 73.9% Part-time: 26.1% GB Full-time: 68.8% Part-time: 31.2%	Increase in employment rate	ONS/NOMIS
			% of population of working age who claim unemployment benefit	10/2008- 9/2009 Economically Active: 145,400 (77.9%) Unemployed: 12,700 (8.7%)	10/2008- 9/2009 Economically Active London: 75.8% GB: 78.9% Unemployed: London: 8.4% GB: 7.4%	Decrease unemployment	ONS/NOMIS
			Number of years unemployed by age			Reduce number of years unemployed across all age bands	ONS/NOMIS