

Sustainability Appraisal of the Lewisham Town Centre Area Action Plan

Sustainability Appraisal - Submission Version

September 2012

Prepared for

London Borough of Lewisham

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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 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 Submission Version. This Report has been produced following consultation on the Sustainability Appraisal of the Area Action Plan Proposed Submission Version (January 2012).

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 6a¹. It is also

¹ 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 th May 2005 – 20 th 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 th August 2007 – 28 th Sept 2007 (alongside the AAP Preferred Options)
Sustainability Appraisal Revised Scoping Report 2010 (Lewisham Borough Council)	N/A	12 th Nov 2010 – 6 th December 2010
Sustainability Appraisal Further Options Report Nov 2010 (Urban Practitioners)	Area Action Plan Further Options Report Nov 2010 (Lewisham Borough Council)	21 st March 2011 – 3 rd 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)	12 th March 2012 – 23 rd April 2012 (alongside the AAP Proposed Submission)
Sustainability Appraisal Submission Report Sep 2012 (Mouchel Ltd)	Area Action Plan Submission Sep 2012 (Lewisham Borough Council)	Planned to be September / October 2012

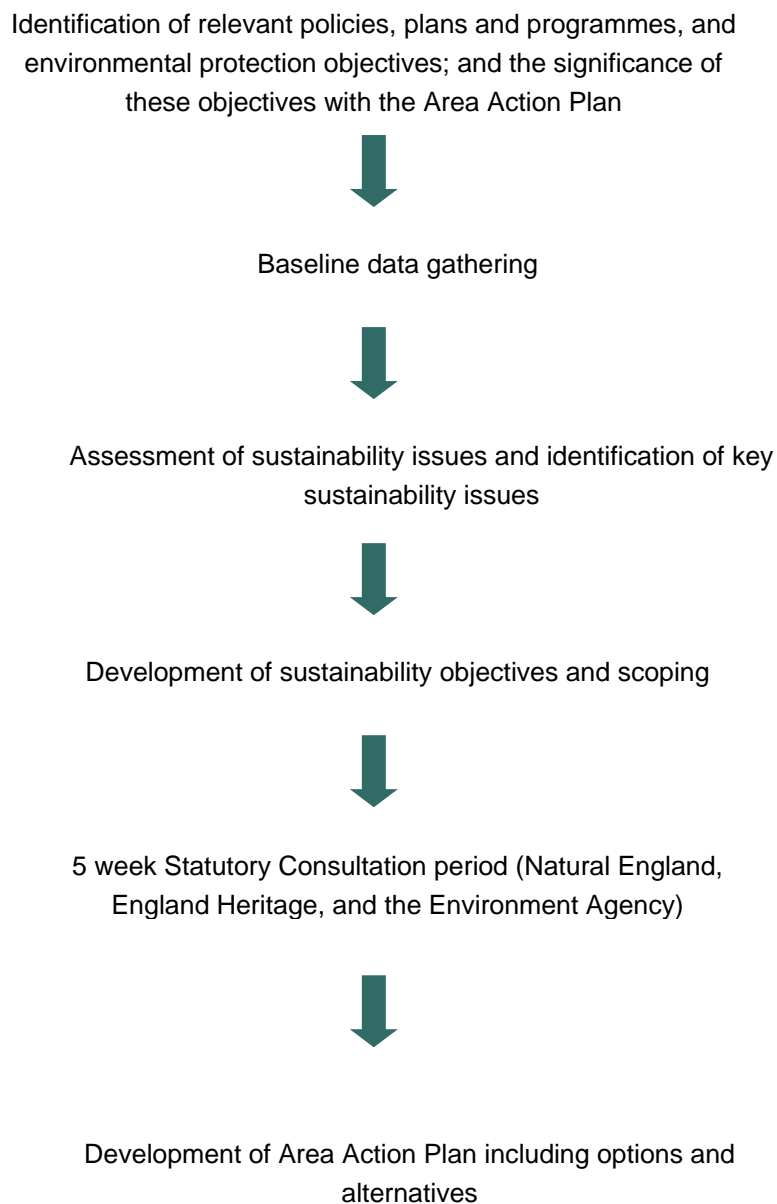
The approach and the format of the Sustainability Appraisal Report follow best practice and guidance on Strategic Environmental Assessment and Sustainability Appraisal produced by government organisations and statutory authorities.

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.

A Proposed Submission Version of the AAP was produced by Lewisham Council: Lewisham Town Centre Area Action Plan Proposed Submission Version March 2012 and the Sustainability Appraisal Report January 2012. Both documents were consulted upon in March and April 2012. One response to the consultation from English Heritage referred to the Sustainability Appraisal, stating that "We have no further comments to make on the SA at this stage". There has therefore been no requirement to make any amendments to the Sustainability Appraisal as a result of the Proposed Submission consultation.

Lewisham Council are recommending a small number of modifications to the Submission Version of the AAP as a result of:

- responses to the consultation on the Proposed Submission Version;
- changes in national policy (i.e. the introduction of the NPPF in March 2012);
and
- minor factual errors in the Proposed Submission Version.

The changes recommended to the Submission Version of the AAP are not significant and do not alter the intent of any policy. There is therefore no requirement to make any changes to the Sustainability Appraisal of the Submission Version of the AAP.

2 Introduction and Methodology

2.1

Introduction

This report has been prepared 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 Proposed Submission Report January 2012ⁱ.

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 th May 2005 – 20 th June 2005 (the issues and options documents were consulted on separately between May and November 2005)
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Sustainability Appraisal Submission Report Sep 2012 (Mouchel Ltd)	Area Action Plan Submission Sep 2012 (Lewisham Borough Council)	Planned to be September / October 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 Strategyⁱⁱ 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 floorspace by 2026.

- c. Accommodate up to 2,300 new homes by 2016 and a further 1100 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)ⁱⁱⁱ. 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 5.10 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 of this SA Report</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 of this SA Report</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^{iv} gives full detail of all consultation undertaken throughout the process.</p> <p>Table 5-23 and</p> <p>Table 5-24 of this SA Report 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^{iv} gives full detail of all consultation undertaken throughout the process.</p> <p>Table 5-23 and</p> <p>Table 5-24 of this SA Report 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) ^v 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
SA Stages and Tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA.
DPD Stage 2: Production
SA Stages and Tasks
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • B1: Testing the DPD objectives against the SA framework. • B2: Developing the DPD options. • B3: Predicting the effects of the DPD. • B4: Evaluating the effects of the DPD. • B5: Considering ways of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs.
<p>Stage C: Preparing the Sustainability Report</p> <ul style="list-style-type: none"> • C1: Preparing the SA Report.
<p>Stage D: Consulting on the preferred options of the DPD and SA Report</p> <ul style="list-style-type: none"> • D1: Public participation on the preferred option of the DPD and the SA Report. • D2(i): Appraising significant changes
DPD Stage 3: Examination
SA Stages and Tasks
<ul style="list-style-type: none"> • D2(ii): Appraising significant changes resulting from representations.

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

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^{vi}. 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^{iv} 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 Reportⁱ.

- 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^{vii}.

- 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^{viii} and the Revised Scoping Report 2010^{vii}, 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.^{ix}

- 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.^x 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^{xi}; 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^{ix}. 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^{xii} and the Sustainability Appraisal Report 2010ⁱ.

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 5.13 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.

Public consultation on the Lewisham Town Centre Area Action Plan Proposed Submission Version and the accompanying Sustainability Appraisal was undertaken from 12th March 2012 until 23rd April 2012.

- D2(i): Appraising significant changes

Only one representation from the Proposed Submission public consultation referred to the Sustainability Appraisal. English Heritage commented that they had no further comments. There has therefore been no requirement for any changes to be made to the Lewisham Town Centre Area Action Plan or the Sustainability Appraisal.

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 5.9 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 5.9 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 DPDⁱⁱ 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.

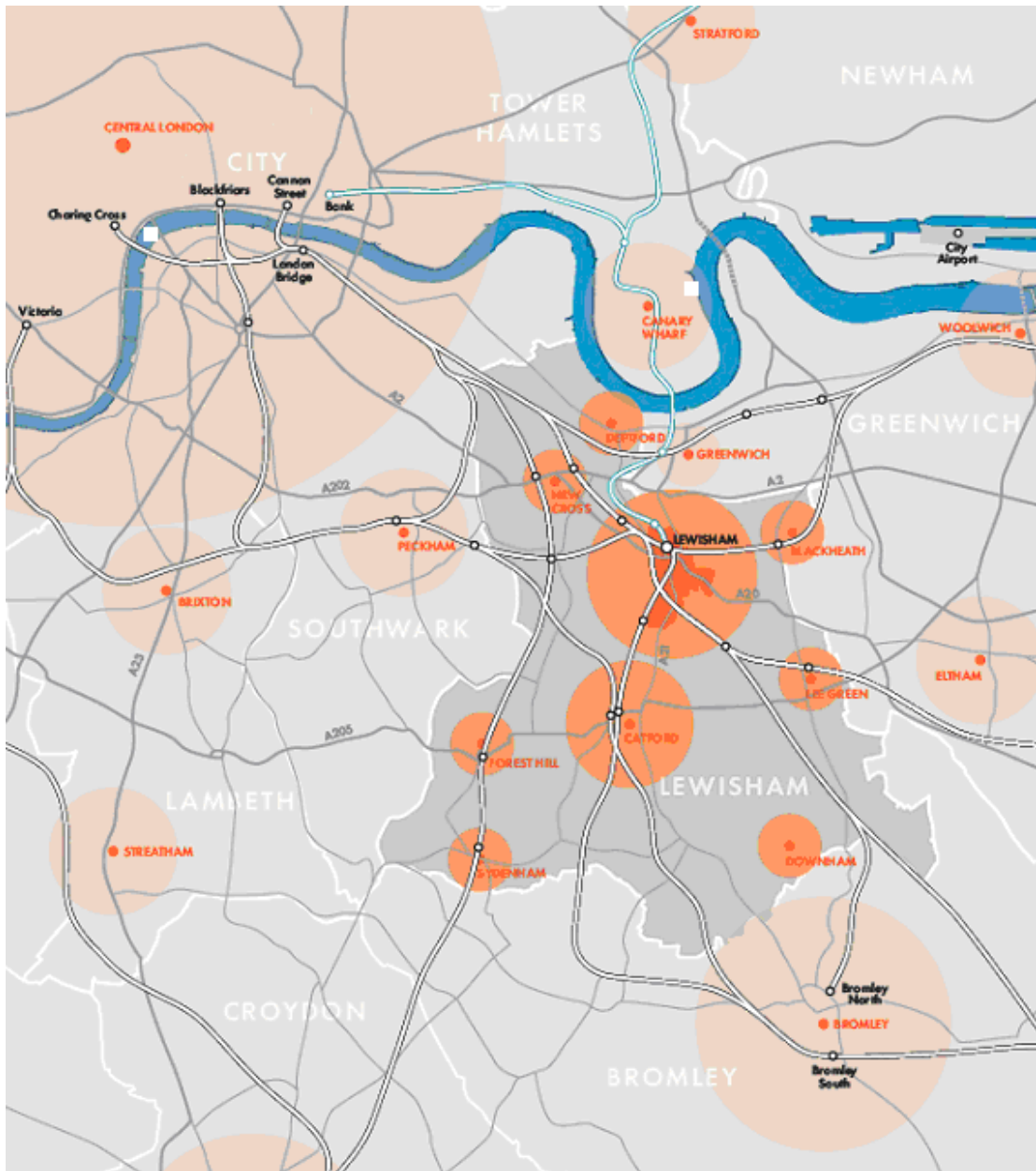


Figure 3-1 Lewisham in Context^{xii}



Figure 3-2 Lewisham Town Centre Area Action Plan ^{xii}

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^{xiii} :

“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 Reportⁱ 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
International
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)
European Union
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).

Plans, Policies and Programmes
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)
National
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)
The Localism Act (2011)
National Planning Policy Framework (2012)
PPS10: Planning for Sustainable Waste Management
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)
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

Plans, Policies and Programmes
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)
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)
Lewisham
Lewisham Core Strategy 2011-2026 (adopted June 2011)
Shaping Our Future: Lewisham's Sustainable Community Strategy (SCS) 2008-2020 (Lewisham Strategic Partnership, June 2008)

Plans, Policies and Programmes
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) 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)

Plans, Policies and Programmes
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

- National Planning Policy Framework (NPPF) – Sets out the Government's comprehensive planning policies for England and how these are expected to be applied. As of March 2012 it has replaced the vast majority of the preceding national guidance (Planning Policy Statements and Planning Policy Guidance). Full details of replaced documents can be found on page 58 of the NPPF.
- 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 ^{iv}.

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
Economic
<p>Poor rates of retail growth in Lewisham Town Centre</p> <ul style="list-style-type: none"> • 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. <p>Low quality retail offer</p> <ul style="list-style-type: none"> • Issues with the street market, including mess and refuse, upgrading and improper parking. • Provision of adequate employment land to support business enterprise. • 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. • Opportunities need to be taken to support employment growth sectors and improve local training opportunities. • Limited offer and a lack of growth of the evening economy. The vitality of the town centre should be enhanced beyond peak shopping hours.
Environmental
<p>Protect and improve biodiversity and natural habitats including local waterways</p> <ul style="list-style-type: none"> • 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. • The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration. • 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. • The Rivers Quaggy and Ravensbourne run through the AAP area and increase the risk of flooding in the area. • Future increased development could lead to increased potential risk of surface water flooding and sewer surcharging. <p>Water quality and use</p> <ul style="list-style-type: none"> • In order to proceed with housing growth then water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance. • Water quality of river and groundwater is needed as the town centre is situated within an Inner Source Protection Zone (SPZ1) • 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. • 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.

Key Sustainability issues
<p>CO₂ emissions contributing to climate change</p> <ul style="list-style-type: none"> • Climatic change due to greenhouse gas emissions from fossil fuel use is likely to affect the natural environment. • 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. • 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. • Lewisham's Energy policy requires a reduction in overall Carbon Dioxide (CO₂) emissions from buildings by maximising efficiency gains through each stage of the Mayor of London's energy hierarchy.
<p>Traffic congestion and car dependence</p> <ul style="list-style-type: none"> • 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. <p>High levels of air pollution due to traffic</p> <ul style="list-style-type: none"> • 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.
<p>Aging building stock and poor levels of insulation</p> <ul style="list-style-type: none"> • The existing building stock will require updating with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings. <p>New building design</p> <ul style="list-style-type: none"> • 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. <p>The need to increase the amount of renewable energy generated in the borough</p> <ul style="list-style-type: none"> • Lewisham's Energy policy requires an increase in the proportion of energy generated from renewable energy sources. <p>Low levels of recycling and the need to reduce total waste production</p> <ul style="list-style-type: none"> • 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.
Social
<p>High demand for housing, affordability and continuous growth in population</p> <ul style="list-style-type: none"> • 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. • There is an issue with access to affordable housing in Lewisham, highlighted by Lewisham Housing Commission. <p>Decent and accessible homes</p> <ul style="list-style-type: none"> • The percentage of homes that do not meet decent homes standards is reducing;

Key Sustainability issues
<p>however there is still a need to improve this.</p> <ul style="list-style-type: none"> • 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.
<p>Improved access to health care, education and community facilities</p> <ul style="list-style-type: none"> • Ensure that improved and accessible health, education and community facilities are provided to accommodate the needs arising from new developments and meeting existing needs. <p>Low levels of educational attainment</p> <ul style="list-style-type: none"> • 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. <p>Addressing deprivation, social exclusion and health inequalities</p> <ul style="list-style-type: none"> • 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. • There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.
<p>General perception of high crime rates in Lewisham</p> <ul style="list-style-type: none"> • 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. • 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.
<p>Provision of open space and recreational facilities</p> <ul style="list-style-type: none"> • 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.
<p>Noise</p> <ul style="list-style-type: none"> • Road traffic and road works noise are the most problematic types of noise for Lewisham residents. <p>Road safety</p> <ul style="list-style-type: none"> • 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. • The number of road accidents although reducing could still be improved.

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
Social		
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
Environmental		
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
Sustainable economic growth		
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^{xii}. 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
Soc1	Positive compatible	Positive compatible	Positive compatible	Possible conflict	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Positive compatible
Soc2	Positive compatible	Positive compatible	Neutral	Neutral	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
Soc3	Neutral	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible
Soc4	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc5	Possible conflict	Possible conflict	Positive compatible	Possible conflict	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
Soc6	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc7	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc8	Positive compatible	Neutral	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc9	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc10	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc11	Neutral	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc12	Positive compatible	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Soc13	Positive compatible	Possible conflict	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Env1	Neutral	Possible conflict	Positive compatible	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
Env2	Neutral	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
Env3	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Env4	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
Env5	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
Env6	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
Env7	Positive compatible	Positive compatible	Neutral	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
Env8	Positive compatible	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible
Env9	Possible conflict	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
Env10	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
Eco1	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Possible conflict	Neutral	Positive compatible	Positive compatible	Positive compatible
Eco2	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
Eco3	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible
Eco4	Positive compatible	Possible conflict	Neutral	Positive compatible	Possible conflict	Neutral	Positive compatible	Positive compatible	Positive compatible
Eco5	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^{xi} 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).	<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> <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 homes - as proposed below.</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>
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).	
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.	

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

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?		
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

LCT3: HOW BEST CAN THE AAP PROMOTE HIGHER RESIDENTIAL DENSITIES IN AREAS OF HIGH PUBLIC TRANSPORT ACCESSIBILITY?		
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 ²).	

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"> - 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) providing that this will increase the diversity of the retail offer; - and Eco2 (To encourage a vibrant, well-managed evening economy). <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"> - Soc4 (To increase the provision of accessible and inclusive everyday facilities); - Soc9 (To improve access to amenities for vulnerable members of the community); - and potentially Soc8 (To increase access to lifelong learning) through the library.
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

LTC8: WHAT APPROACH SHOULD THE AAP TAKE TO THE DESIGNATION OF CORE AND NON-CORE SHOPPING FRONTAGES?		
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

LTC10: SHOULD THE TOWN CENTRE BOUNDARY BE ALTERED?		
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"> - are located close to transport hubs and so supporting Sustainability Objectives Env2 (To reduce dependency on private cars.) - consider carbon emissions from these buildings and so support Sustainability Objective Env3 (To increase on-site renewable energy provision). - consider management of waste and recycling and so support Sustainability Objective Env5 (To increase the amount of waste recycling).
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		
LTC12: WHAT POLICY APPROACH SHOULD BE TAKEN TO EXISTING ESTABLISHED INDUSTRIAL AREAS IN THE TOWN CENTRE?		
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

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?		
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

ENVIRONMENT		
LTC16: PROTECTION OF THE RIVER ENVIRONMENT		
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		
	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
	RRB2	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

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	Lewisham Gateway
LTCOPP1a	General Principles for Lewisham Gateway
LTCOPP2	Lewisham Centre and Adjoining Land
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	Lee High Road
LTCOPP3a	Lee High Road Western End
LTCOPP3b	Lee High Road Eastern End
LTCOPP3c	Clarendon Green
LTCOPP4	Loampit Vale
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
LTCOPP5	Conington Road
LTCOPP5a	Northern Link
LTCOPP5b	Tesco Block
LTCOPP5c	Car Park and Petrol Station
LTCOPP6	Engate Street
LTCOPP6a	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"> • 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. • 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. • The timing of different works, including works outside the plan area should be considered when assessing potential noise and disruption and planning mitigation.
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^{xii} and the Sustainability Appraisal Report 2010^{xi}.

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 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.

5.8 Further significant environmental effects of the AAP Submission Version

Lewisham Council are recommending a small number of modifications to the Submission Version of the AAP as a result of:

- responses to the consultation on the Proposed Submission Version;
- changes in national policy (i.e. the introduction of the NPPF in March 2012);
and
- minor factual errors in the Proposed Submission Version.

There were no responses received to the consultation on the Proposed Submission Version Sustainability Appraisal that required amendment of the Submission Version of the Sustainability Appraisal.

The changes recommended to the Submission Version of the AAP are not significant and do not alter the intent of any policy. There is therefore no requirement to make any changes to the Sustainability Appraisal of the Submission Version of the AAP.

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>Social: Positive to providing good quality affordable house for students, which is accessible and inclusive</p> <p>Environment: sustainable and accessible student housing is positive to many environmental objectives</p> <p>Economic: 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>Social: Tall buildings placed in appropriate places will enhance the urban environment</p> <p>Environment: 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>Social Environment economic</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>Social: 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>Environment: 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>Economic: 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>Social: Positive to increased accessibility and pedestrian safety possible conflicts heritage assets.</p> <p>Environment: Positive to climate change adaptability and reduction in congestion by increasing pedestrian access, possible conflicts new buildings require use of resources.</p> <p>Economic: 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>Social: 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>Policy LAAP7: Ladywell Town Centre Area</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>Social: Should improve access to amenities</p> <p>Environment: 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>Economic: 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	
Policy - S6 Tesco block, car park and petrol station - Additional site specific requirements			+	++	+		+	0		+	0	-	0	-	-	-	0	0	-	-	-	-	+	+	0	+		+	Social: 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

5.9 Equalities Analysis Assessment

5.9.1 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'.

5.9.2 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^{xiv}.

5.9.3 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.

5.10 The Habitat Regulations Assessment (HRA)

5.10.1 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.

5.10.2 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.

5.11 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.

5.11.1 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^{xi}.

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

5.12 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^{xii}).

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>Lewisham and Catford Flood Alleviation Scheme</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"> ▪ flood risk is managed carefully ▪ river environments are improved as new development occurs, and ▪ developer contributions are used where appropriate through partnership working. <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>2.1 Geographical Context - 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>2.2.2 Environment - Flood Risk - 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>2.4 Objectives - 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"> • support for greater use of Sustainable Drainage Systems (SuDS) to help avoid large investments in unsustainable hard infrastructure; • identify design approaches that avoid and reduce flood risk to and from new development (PPS 25); • information to improve emergency planning decisions for local authorities and awareness of surface water flooding when preparing for emergencies. 	<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>Character Area Policy 4 - 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>SA Objective Env7 - 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>Appraising the APP</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"> • Policy LAAP23: Heritage assets

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

5.13 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*”ⁱⁱⁱ 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 2011

see Appendix 1^{xi}). 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 educational 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 ₂ 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 ₂ 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
Social						
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
Environmental						
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
Economic						
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)			

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- ⁱ Urban Practitioners, Sustainability Appraisal and Strategic Environmental Assessment Lewisham Town Centre further options report November 2010
- ⁱⁱ Lewisham Borough Council, Core Strategy June 2011
- ⁱⁱⁱ 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’)
- ^{iv} London Borough of Lewisham, Statement of Consultation for the Lewisham Town Centre Area Action Plan Area January 2012
- ^v A Practical Guide to the Strategic Environmental Assessment Directive - ODPM Sept 2005
- ^{vi} Urban Renaissance Lewisham: Health and Social Impact Assessment’ March 2004
- ^{vii} Urban Practitioners, Sustainability Appraisal Scoping Report 2010
- ^{viii} London Borough of Lewisham Sustainability Scoping Report 2005
- ^{ix} Faber Maunsell/AECOM Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Preferred Options report 2007
- ^x Urban Practitioners Lewisham Town Centre Area Action Plan Issues and Options Report June 2005
- ^{xi} Urban Practitioners Sustainability Appraisal Report of the Lewisham Town Centre Area Action Plan Preferred Options April 2007
- ^{xii} Urban Practitioners: Lewisham Town Centre Area Action Plan Further Options Report March 2011
- ^{xiii} London Borough of Lewisham Sustainable Community Strategy 2008-2020:
- ^{xiv} Equalities Analysis Assessment Lewisham Town Centre Area Action Plan Further Options Report June 2011