



**London Borough of Lewisham
Local Development Framework
Lewisham Town Centre Local Plan
Sustainability Appraisal Adoption Statement**

1. Overview

1.1 Lewisham Council adopted the Lewisham Town Centre Local Plan (LTCLP) development plan document at its meeting on 26 February 2014. In accordance with Regulation 16(3) and (4) of the SEA Regulations, the Council has produced this sustainability appraisal (SA) adoption statement. It describes:

- how the SA process has influenced the progression of the LTCLP
- how environmental considerations and consultation responses have been taken into account during its preparation
- outlines the reasons for choosing the preferred strategy in light of other reasonable alternatives
- sets out measures that will be used to monitor the effects of the LTCLP.

1.2 Full details are set out in the final SA, which was submitted with the LTCLP to the Secretary of State for Communities and Local Government on 28 September 2012.

2. Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) background

2.1 Sustainability appraisals (SAs) are a requirement of the Planning and Compulsory Purchase Act 2004 and Strategic Environmental Assessments (SEAs) are required by European Directive EC/2001/42 (SEA Directive). This was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes July 2004. Central government guidance (ODPM, 2005) has merged these processes to allow for a single joint appraisal to be carried out, therefore the LTCLP SA incorporates the SEA.

2.2 The SEA Regulations requires local planning authorities to carry out formal strategic environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The SEA process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored.

2.3 The National Planning Policy Framework (NPPF) requires a SA (SA) of local development documents, which incorporates the requirements of the SEA Directive but broadens this to also include social and economic considerations. The purpose of SA is to systematically appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the preparation process. This will ensure that decisions are made that accord with the principle of sustainable development.

1.4 Throughout the remainder of this statement, reference to SA encompasses the requirements of a merged SA/SEA.

3. SA process

- 3.1 The Lewisham Town Centre Local Plan identifies, designates and safeguards land for a particular use, and sets out policies to be used when determining planning applications.

- 3.2 The progressive stages of the SA has been prepared by officers from the London Borough of Lewisham’s Planning Policy team, by Faber Maunsell, by Urban Practitioners, and by the Mouchel Group, with input from other relevant services of the Council.

- 3.3 The SA comprised a number of stages.
 - The production of a **scoping report**, which examined sustainability issues in the borough. The issues identified were used to produce a sustainability appraisal framework against which the plan could be measured. The scoping report was published for consultation in May 2005.
 - The appraisal of the **issues and options** and **preferred options**, the results of which are presented within the SA report, April 2007.
 - The **revised SA scoping report**, October 2010
 - The appraisal of the **further options**, the results of which are presented within the SA report, March 2011.
 - The appraisal of the **proposed submission** plan, the results of which are presented within the SA report, January 2012.
 - The appraisal of the **submission version** of the plan, September 2012.
 - The appraisal of the **main modifications** to the plan proposed in March 2013 during the Examination in Public .
 - The appraisal of the **further main modifications** proposed to the plan in August 2013 subsequent to the second hearing held in July 2013.

- 3.4 At each stage the vision, objectives and policy content of the LTCLP were assessed against a framework of sustainability objectives. The objectives covered social, environmental and economic issues reflecting national, regional and local issues as well as environmental considerations set out in the SEA guidance. Table 1 summarises the key sustainability issues.

Table 1: 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.

Key Sustainability issues
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.
<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.

Key Sustainability issues
<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.
<p>Social</p>
<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; however there is still a need to improve this. 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,

Key Sustainability issues
<p>particularly in the High Street, where there are problems with conflict between traffic, buses and pedestrians.</p> <ul style="list-style-type: none"> • The number of road accidents although reducing could still be improved.
<p>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</p> <ul style="list-style-type: none"> • 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. How sustainability and environmental considerations have been integrated into the Lewisham Town Centre Local Plan, and how the environmental report has been taken into account

4.1 The SA identified the key sustainability issues in table 1 above. The LTCLP has been progressed to address these sustainability issues. The LTCLP integrates sustainability and environmental issues in the following key ways.

- Supporting the regeneration and renewal of the London Plan Opportunity Area at Lewisham, working in close partnership with all key stakeholders.
- Increasing the number and variety of job opportunities for local people by protecting land for employment use within neighbourhoods.
- Supporting the growth of key economic sectors by maintaining a varied supply of business premises by ensuring a mix in employment land designations and through plans for town centre regeneration.
- Increasing the overall supply of housing and increasing the mix and quality of housing to meet need identified through the Strategic Housing Market Assessment.
- Enabling Lewisham to adapt to the effects of climate change through the design of the built environment, the management of flood risk, providing sustainable urban drainage, urban greening, and maximising water efficiency within new developments.
- Reducing carbon emissions by minimising the need to travel, promoting decentralised energy networks, and maximising energy efficiency in buildings.
- Safeguarding and increasing biodiversity, supporting river naturalisation and seeking living roofs where appropriate.
- Working in partnership with government, Transport for London, Network Rail and major developers to increase public transport capacity and accessibility, reduce reliance on the private car, and promote walking and cycling.

- Increasing the quality of open space by safeguarding, linking and upgrading existing open space, improving access to open space, planting new trees, and seeking new on-site open space where appropriate.
- Creating and sustaining distinctive local places through excellent design of buildings and the public realm, valuing heritage assets and the natural environment.
- Developing and sustaining stable neighbourhoods with a high quality, liveable residential environment, respecting local amenity, and ensuring good access to local services and transport.
- Protecting and enhancing historic assets in partnership with English Heritage, neighbouring boroughs and community groups.
- Contributing to improving health and well-being and reducing health inequalities in the by working with NHS Lewisham, encouraging healthy lifestyles in the design of the built environment.
- Providing essential physical, social and green infrastructure to support population and economic growth through the co-ordinated delivery of infrastructure programmes through the Infrastructure Delivery Plan and ongoing liaison with statutory undertakers.
- Increasing community safety, by implementing Safer by Design principles to design out crime and reduce the fear of crime in the built environment, and joint working within the Safer Lewisham Partnership.

5. How the consultation findings have been taken into account

- 5.1 The following sections explain how the SA consultation responses have been taken into account.
- 5.2 Preparation of the SA for the LTCLP was an iterative process informing policy formulation at every stage. There have been eight stages of consultation in total. Consultation has been undertaken in accordance with Article 6 of the SEA Directive, the SEA Regulations, the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and Lewisham's adopted Statement of Community Involvement (July 2006).
- 5.3 Throughout the process, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). All consultees on the Council's consultation database have also been given the opportunity to comment. Comments have shaped the appraisal and have been fed into the assessment of options, preferred options, further options and the formulation of the LTCLP itself up to and the examination stage. Details regarding the comments received and the changes made to the sustainability appraisals as a result of those comments have been provided in each of the sustainability appraisal documents.

5.4 Work on the LTCLP began in 2005. Table 2 summarises the key stages in the development of the plan and SA, the timetable and the opportunities for comment during the process. At each stage the LTCLP was revisited to ensure that representations received could be addressed, as appropriate.

Table 2 Key stages in the development of the Lewisham Town Centre Local Plan

Sustainability Appraisal Reports	LTCLP (previously referred to as an area action plan)	Consultation Period
Sustainability Appraisal Scoping Report 2005	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	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 March 2011	Area Action Plan Further Options Report March 2011 (Lewisham Borough Council)	21 st March 2011 – 3 rd May 2011 (alongside the AAP Further Options)
Sustainability Appraisal Proposed Submission Report Jan 2012	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	Area Action Plan Submission Sep 2012 (Lewisham Borough Council)	1st October – 12th November 2012
Sustainability Appraisal of main modifications to the plan proposed March 2013 during Examination in Public	Main modifications to plan, proposed March 2013 during Examination in Public	20 th March – 1 st May 2013
Sustainability Appraisal of further main modifications to the plan proposed August 2013 during Examination in Public	Further main modifications to plan, proposed August 2013 during Examination in Public	16 th August – 4 th October 2013

5.6 The LTCLP Consultation Statement September 2012 describes how the Council has undertaken community participation and involvement in the preparation of the plan and identified where changes were made during redrafting to the LTCLP as a result of representations received for the following stages:

- scoping / pre-production (2005)
- issues and options (2005)
- preferred options (2007)
- further options (2011)
- proposed submission (2012).

5.7 These documents are available to view on the Council's website (<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/lewisham/Pages/default.aspx>).

6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

- 6.1 The SA process was integral to the Lewisham Town Centre Local Plan preparation, commencing with the production of the SA scoping report. This involved identifying the sustainability issues and objectives, as well as identifying relevant baseline information and indicators.
- 6.2 The LTCLP went through distinct iterations. At each stage the LTCLP was tested against the SA framework so that the economic, environmental and social implications of different policy options could be taken into consideration. The LTCLP was developed and modified, as appropriate, in line with the findings of the SA and in line with the comments received from consultees regarding the iterations of the SA, the scoping report, the issues and options, and the draft versions on the plan.
- 6.3 The preferred options report and further options report sets out the reasons why the policy options were selected, in light of other reasonable alternatives dealt with. Further justification is provided in the text within the adopted version of the plan, and within the Council's responses to representations received at submission and examination stage. These documents can be viewed on the Council's website at: <http://www.lewisham.gov.uk/myservices/planning/policy/LDF/lewisham/Pages/default.aspx>

7. Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

- 7.1 The Council will monitor the significant environmental effects of the implementation of the plan through the monitoring framework set out in section 7 and appendix 3 of the adopted plan. The monitoring results will be reported in the Council's annual monitoring report, and in other specialist reports where required.

Further information

A full copy of the SA for the Lewisham Town Centre Local Plan can be downloaded from the Council's website:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/lewisham/Pages/default.aspx>