



AGENDA

MAYOR AND CABINET

Date: WEDNESDAY, 19 JANUARY 2011 at 6.00 pm

**Committee Rooms 1 & 2
Civic Suite
Lewisham Town Hall
London SE6 4RU**

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MEMBERS

Bullock	(L)
Councillor Best	(L)
Councillor Egan	(L)
Councillor Fitzsimmons	(L)
Councillor Klier	(L)
Councillor Maslin	(L)
Councillor Millbank	(L)
Councillor Onuegbu	(L)
Councillor Smith	(L)
Councillor Wise	(L)

Members are summoned to attend this meeting

**Barry Quirk
Chief Executive
Lewisham Town Hall
Catford
London SE6 4RU
Date: Date Not Specified**



INVESTOR IN PEOPLE

The public are welcome to attend our committee meetings, however occasionally committees may have to consider some business in private. Copies of reports can be made available in additional formats on request.

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Agenda Item 1

MAYOR AND CABINET		
Report Title	Declarations of Interests	
Key Decision		Item No. 1
Ward		
Contributors	Chief Executive	
Class	Part 1	Date: 19 January 2011

Declaration of interests

Members are asked to declare any personal interest they have in any item on the agenda.

Personal interests

There are two types of personal interest :-

- (a) an interest which you must enter in the Register of Members' Interests*
- (b) an interest where the wellbeing or financial position of you, (or a "relevant person") is likely to be affected by a matter more than it would affect the majority of inhabitants of the ward or electoral division affected by the decision.

*Full details of registerable interests appear on the Council's website.

("Relevant" person includes you, a member of your family, a close associate, and their employer, a firm in which they are a partner, a company where they are a director, any body in which they have securities with a nominal value of £25,000 and (i) any body of which they are a member, or in a position of general control or management to which they were appointed or nominated by the Council, and (ii) any body exercising functions of a public nature, or directed to charitable purposes or one of whose principal purpose includes the influence of public opinion or policy, including any trade union or political party) where they hold a position of general management or control,

If you have a personal interest you must declare the nature and extent of it before the matter is discussed or as soon as it becomes apparent, except in limited circumstances. Even if the interest is in the Register of Interests, you must declare it in meetings where matters relating to it are under discussion, unless an exemption applies.

Exemptions to the need to declare personal interest to the meeting

You do not need to declare a personal interest where it arises solely from membership of, or position of control or management on:

- (a) any other body to which you were appointed or nominated by the Council
- (b) any other body exercising functions of a public nature.

In these exceptional cases, unless your interest is also prejudicial, you only need to declare your interest if and when you speak on the matter .

Sensitive information

If the entry of a personal interest in the Register of Interests would lead to the disclosure of information whose availability for inspection creates or is likely to create a serious risk of violence to you or a person living with you, the interest need not be entered in the Register of Interests, provided the Monitoring Officer accepts that the information is sensitive. Where this is the case, if such an interest arises at a meeting, it must be declared but you need not disclose the sensitive information.

Prejudicial interests

Your personal interest will also be prejudicial if all of the following conditions are met:

- (a) it does not fall into an exempt category (see below)
- (b) the matter affects either your financial interests or relates to regulatory matters - the determining of any consent, approval, licence, permission or registration
- (c) a member of the public who knows the relevant facts would reasonably think your personal interest so significant that it is likely to prejudice your judgement of the public interest.

Categories exempt from being prejudicial interest

- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
- (b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor;
- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception)

Effect of having a prejudicial interest

If your personal interest is also prejudicial, you must not speak on the matter. Subject to the exception below, you must leave the room when it is being discussed and not seek to influence the decision improperly in any way.

Exception

The exception to this general rule applies to allow a member to act as a community advocate notwithstanding the existence of a prejudicial interest. It only applies where members of the public also have a right to attend to make representation, give evidence or answer questions about the matter. Where this is the case, the member with a prejudicial interest may also attend the meeting for that purpose. However the member must still declare the prejudicial interest, and must leave the room once they have finished making representations, or when the meeting decides they have finished, if that is earlier. The member cannot vote on the matter, nor remain in the public gallery to observe the vote.

Prejudicial interests and overview and scrutiny

In addition, members also have a prejudicial interest in any matter before an Overview and Scrutiny body where the business relates to a decision by the Executive or by a committee or sub committee of the Council if at the time the decision was made the member was on the Executive/Council committee or sub-committee and was present when the decision was taken. In short, members are not allowed to scrutinise decisions to which they were party.

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Agenda Item 2

MAYOR AND CABINET		
Report Title	Minutes	
Key Decision		Item No.2
Ward		
Contributors	Chief Executive	
Class	Part 1	Date: 19 January 2011

Recommendation

It is recommended that the minutes of that part of the meetings of the Mayor and Cabinet which were open to the press and public, held on 1 December 2010 and 22 December 2010 be confirmed and signed (copy attached).

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LONDON BOROUGH OF LEWISHAM

MINUTES of that part of the meeting of the MAYOR AND CABINET, which was open to the press and public, held on WEDNESDAY, 1 DECEMBER 2010 at LEWISHAM TOWN HALL, CATFORD, SE6 4RU at 6.00 p.m.

Present

The Mayor (Sir Steve Bullock)(Chair); Councillor Smith (Vice-Chair), Councillors Fitzsimmons, Maslin, Millbank, Onuegbu and Wise.

Also Present

Councillors Bell, and Pachoud.

<u>Minute No.</u>	<u>Action</u>
1. <u>Declarations of Interests</u> (page	
	There were no declarations of interest.
2. <u>Minutes</u> (page	
RESOLVED	that the minutes of that part of the meeting of the Mayor and Cabinet, which was open to the press and public held on November 17 2010, be confirmed and signed.
3. <u>Outstanding References to Select Committees</u> (page	
	The Mayor received a report on issues which he had previously considered that awaited the responses he had requested from Directorates.
	RESOLVED that the report be received.
4. <u>Report Back On Matters Raised By The Overview And Scrutiny Business Panel</u> (page	
	No matters were raised by the Business Panel
5. <u>Positive Activities Fund</u> (page	
RESOLVED	That proposals contained in Appendix 1 be approved.
6. <u>Telegraph Hill Skate Park</u> (page	
	The report was introduced by Councillor Susan Wise and by a representative of the Executive Director for Customer Services,

following which there was a representation in favour of the skate park proposal by Sophie Beswick of the Skate Park Action Group. She was supported by a colleague and five teenage boys who were intended users of the proposed facility. They stressed the community support for the project and the benefits to one of the most deprived wards in the borough.

The Mayor was next addressed by local resident Sue Harry who objected to possible noise nuisance and the construction of a facility that was out of character with the park. She questioned the methodology of the noise survey produced in support of the skate park. She also voiced concerns about the thoroughness of the consultation process.

Bill Tautz also spoke against the proposals stating he did not believe the site was appropriate for a skate park and that flaws in the proposals may lead to legal challenge. He said, speaking as a father of teenagers, he believed there was sufficient youth provision in the area and that while SPAG had produced a credible case, the park was too small to support a skate facility and other areas in the borough should be considered.

Councillor Bell read out a statement on behalf of all the Telegraph Hill ward members. On balance, after hearing all sides and having been involved throughout the consultation process with local people, the ward members wished to support the proposals and recommend them to the Mayor.

Councillor Millbank confirmed this statement and acknowledged the proposals had been very controversial locally. She commended the young people who had been involved and stated she had been convinced by their arguments that the facility was needed and would be of benefit to the community at large.

The Mayor thanked everyone who had made a submission and said he was impressed by the way in which two widely conflicting viewpoints had made their cases in such a logical and correctly expressed fashion. He pointed out it was highly unusual for a decision on such a localised issue to be taken at a Mayor & Cabinet meeting but such had been the weight of public representation that a determination about the facility had become a key decision. He said he had read carefully all of the correspondence relating to the proposal and had received assurances from council officers that all legal, technical and financial aspects had been addressed. He recognised that no-one was against skate parks as such, but that some of those most closely affected had raised legitimate concerns which

Minute No.

Action

needed to be addressed. After careful consideration he stated he was minded to agree the scheme and the recommendations shown below.

RESOLVED that

(i) the proposal to construct a skate park in the lower Telegraph Hill park, adjacent to the ball court be approved;

(ii) the construction of a skate park in that location will be subject to a satisfactory structural survey being obtained by the Council and to the funding being sufficient to cover all construction and related costs; and

ED Customer

(iii) authority be delegated to the Executive Director for Customer Services to determine whether the structural survey referred to in recommendation 3.2 is satisfactory and to approve the work programme and make all other decisions required in respect of the project.

ED Customer

7. Forest Hill School Deficit Budget (page

RESOLVED that the report be noted.

(i) Forest Hill School should have a licensed deficit budget of £557,000; and

ED CYP

(ii) in accordance with the Scheme of Delegation the school brings the budget back into a surplus position; this to be achieved within a three year period.

ED CYP

8. Annual Report on Children's Social Care Complaints and Representations 1st April 2009 – 31st March 2010 (page

RESOLVED that

(i) the complaints handling process for 2009 – 2010 be noted;

(ii) the complaint issues and lessons learnt be noted; and

(iii) the future service improvement initiatives be ED CYP

Minute No.

Action

approved.

9. Appointment of Local Authority Governors (page

RESOLVED	that the following persons be appointed as School Governors:	ED CYP
	Cllr Jim Mallory	Abbey Manor College
	Ms Jayne Day	Clyde Early Childhood Centre
	Ms Felicity Hilditch	Coopers Lane
	Mrs Melanie Pennant	Coopers Lane
	Ms Karen Pinkney	Deptford Green
	Mr Raymond Banton	Forster Park
	Ms Alice Cairns	Greenvale
	Ms Alice Washbourne	Myatt Garden
	Mrs Julia Glyn-Pickett	Sir Francis Drake

10. Local Development Framework: Adoption of Planning Obligations Supplementary Planning Document (page

RESOLVED	That	
	(i) the recommended changes to the draft Planning Obligations SPD and the accompanying Sustainability Appraisal be approved;	ED Regen
	(ii) the Planning Obligations SPD and Sustainability Appraisal be approved and the documents be referred to the Council for formal adoption; and	ED Regen
	(iii) authority be delegated to the Executive Director, Regeneration to make any minor editorial changes to the text and format of the documents prior to consideration by full Council,	ED Regen

11 Travellers' Site Search - Update (page

Minute No.

Action

RESOLVED

That

(i) the context of the developing planning framework for providing Gypsy and Traveller sites across London be noted;

ED Regen

(ii) Officers to undertake further work, including a Housing Needs Survey for Gypsies and Travellers, once the outcome of the proposal to remove the target based approach for provision of Gypsy and Traveller sites from the Draft Replacement London Plan is known; and

ED Regen

(iii) a further report be brought back to Mayor & Cabinet, based on the work referred to above, that will propose a consultation process for a proposed Gypsy and Traveller site or sites in the borough.

ED Regen

12. Re-Development of Heathside and Lethbridge: Phase 3 decant and Phase 2 land disposal (page

RESOLVED

that

(i) the progress of the Heathside and Lethbridge Regeneration Scheme and the proposed changes be noted;

(ii) the proposed Phase 2 Project Brief on the basis set out in this report and delegates authority to the Director of Programme Management and Property, in consultation with the Executive Director for Resources, Executive Director for Customer Services and Head of Law, to negotiate and agree the final Phase 2 Project Brief with Family Mosaic Housing;

ED Regen
ED Resources

(iii) the proposed phasing strategy for the Heathside and Lethbridge Regeneration Scheme be noted;

(iv) Officers carry out statutory consultation pursuant to Section 105 of the Housing Act 1985 on the proposed changes to the phasing strategy set out.

ED Regen

13. Matter referred by the Perry Vale Assembly – traffic report (page

Minute No.

Action

The report was presented by the Chair of the Local Assembly, Councillor John Paschoud who drew the Mayor's attention to a Powerpoint presentation and video which had been produced in connection with the submission. He secured agreement from the Mayor that the recommendations be strengthened to include a requirement to attempt to identify resources to tackle some of the priority recommendations.

RESOLVED that the Executive Director for Regeneration be asked to consider and report back on the implications of the 'Statement of Community Views' from the Perry Vale Assembly and that he also attempt to identify potential resources to implement one or more of the priority recommendations. ED Regen

14. Taxicard scheme – Options to prevent overspend (page

Councillor Onuegbu asked if this item should be delayed and looked at as part of the Council's overall review of all fees and charges in the New Year. The Executive Director for Resources representative said this was a London Councils scheme so was taken forward by that body as a separate savings proposal.

Councillor Millbank asked if the Lewisham Disability Council had made a view known and was informed by the Executive Director for Community Services that they were opposed to the changes and their stance would be conveyed to London Councils, as the responsible body.

RESOLVED That

(i) the charging structure of the Taxicard scheme be amended to:

- a. Increase the minimum member charge to £2.50; and
- b. Reduce the maximum trip subsidy by a further £2.00 for all three tariff periods; and
- c. End double swiping.

(ii) the proposed changes to the funding mechanism for the scheme in 2011/12 and the potential implications for Lewisham be noted. ED Community

<u>Minute No.</u>		<u>Action</u>
15.	<p><u>Planning Service : Annual Monitoring Report 2009/10</u> (page</p> <p>RESOLVED That the content of the Annual Monitoring Report 2009/2010 be noted and its formal submission to the Secretary of State for Communities and Local Government be approved.</p>	ED Regen
16.	<p><u>Comments of the Housing Select Committee on the Mortgage Rescue Scheme</u> (page</p> <p>RESOLVED That the views of the Housing Select Committee be received and ask the Executive Director for Customer Services be asked to co-ordinate a response.</p>	ED Customer
17.	<p><u>Response to the Sustainable Development Select Committee scrutiny review on home insulation</u> (page</p> <p>The report was presented by the Cabinet Member for Resources who praised the work done by the Select Committee and asked that the Mayor send a letter of thanks to all the current and former members who had contributed.</p> <p>RESOLVED That</p> <p>(i) the proposed response to the recommendations from the Sustainable Development Select Committee's scrutiny review of home insulation be approved;</p> <p>(ii) the new target of a 40% reduction in the borough's carbon emissions by 2020, from a baseline of 1990 be approved;</p> <p>(iii) the approach described for a borough-wide home insulation partnership, as the alternative to adopting the Sustainable Development Select Committee's recommendation of a borough-wide free insulation scheme be approved and officers be asked to explore the detailed arrangements and seek the Mayor's agreement on a formal proposal; and</p> <p>(iv) a letter of thanks be sent to all current and former Councillors who contributed to the review as published in November 2009.</p>	<p>ED Resources</p> <p>ED Resources</p> <p>ED Resource</p>

Minute No.

Action

18. Exclusion of the Press and Public (page

RESOLVED that under Section 100(A)(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 3, 4 and 5 of Part 1 of Schedule 12(A) of the Act, as amended by the Local Authorities (Executive Arrangements) (Access to information) (Amendments) (England) Regulations 2006 and the public interest in maintaining the exemption outweighs the public interest in disclosing the information:

The following is a summary of the items considered in the closed part of the meeting:

101 Minutes (page

RESOLVED That the minutes of the meetings held on October 20 2010 and November 17 2010 be confirmed as a correct record.

102 Travellers' Site Search - Update (page

The Mayor considered financial information relating to the sites identified in the open report.

RESOLVED That the information be received in the context of the open report on the same item.

The meeting ended at 7.31pm.

Chair

LONDON BOROUGH OF LEWISHAM

MINUTES of that part of the meeting of the MAYOR AND CABINET, which was open to the press and public, held on WEDNESDAY, 22 DECEMBER 2010 at LEWISHAM TOWN HALL, CATFORD, SE6 4RU at 11.30 a.m.

Present

The Mayor (Sir Steve Bullock)(Chair); Councillor Smith (Vice-Chair), Councillors Best, Egan, Fitzsimmons, Klier, Maslin, Millbank, and Wise.

<u>Minute No.</u>	<u>Action</u>
1.	<u>Declarations of Interests</u> (page There were no declarations of interest.
2.	<u>Minutes</u> (page RESOLVED that the minutes of that part of the meeting of the Mayor and Cabinet, which was open to the press and public held on November 18 2010, be confirmed and signed.
3.	<u>Exclusion of the Press and Public</u> (page RESOLVED that under Section 100(A)(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 3, 4 and 5 of Part 1 of Schedule 12(A) of the Act, as amended by the Local Authorities (Executive Arrangements) (Access to information) (Amendments) (England) Regulations 2006 and the public interest in maintaining the exemption outweighs the public interest in disclosing the information: The following is a summary of the items considered in the closed part of the meeting:
101	<u>Minutes</u> (page RESOLVED That the minutes of the meeting held on November 18 2010 be confirmed as a correct record.

Minute No.

Action

102 Building Schools for the Future – Addey and Stanhope School Stage 2 (page

RESOLVED

That

(i) the receipt of the Stage 2 submission and subsequent clarifications from the LEP, and the observations arising from the evaluation of this submission be noted;

(ii) the update on the BSF programme be noted;

(iii) the update on progress with school organisation and approvals, design development and the timetable for development and the financial implications, legal implications and key risks be noted;

(iv) the Council enter into participation and contribution agreements and a development agreement with the school's governing body and trustees as advised by the Head of Law,

(v) authority be delegated to the Executive Director for Resources, on the advice of the Head of Law, to enter into underwriting arrangements up to the maximum values;

(vi) if further Early Works over and above those described are likely to be required (i.e. if Contract Close is delayed beyond 26th April 2011), Officers will prepare a short report for urgent consideration by the Mayor as soon as reasonably practicable to do so, but in any event this would need to be prior to 12th April 2011;

(vii) authority be delegated to the Executive Director for Resources, on the advice of the Head of Law, to approve the LEP's Stage 2 submission, with the key financial data as set out;

(viii) the estimated school contribution towards costs of the ICT managed service to be stated in the participation and contribution agreement to be entered into with the governing body,

(ix) authority be delegated to the Executive Director for Resources, on the advice of the Head of Law, to further negotiate on the detailed scope of the project and project costs, including any irrecoverable VAT, up to a maximum figure plus VAT funding from PfS,

(x) the outstanding approvals required to be satisfied prior to Financial Close be noted;

(xi) authority be delegated to the Executive Director for Resources, on the advice of the Head of Law, to investigate and identify means whereby the unrecoverable VAT for this project may be reduced in order to minimise the shortfall between VAT liability and VAT funding;

(xii) the suite of legal agreements as set out be entered into on the technical and commercial terms set out in the Stage 2 submission; and

(xiii) Addey & Stanhope be incorporated into the existing ICT Framework contract between LBL and LSFLEP Ltd as signed at the original BSF Financial Close on 13 December 2007.

The meeting ended at 11.59am.

Chair

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Agenda Item 3

MAYOR & CABINET		
Report Title	Outstanding References to Select Committees	
Key Decision	No	Item No. 3
Ward		
Contributors	Head of Business and Committee	
Class	Part 1	Date: 19 January 2011

1. Purpose of Report

To report on items previously reported to the Mayor for response by directorates and to indicate the likely future reporting date.

2. Recommendation

That the reporting dates of the item shown in the table below be confirmed.

Report Title	Author	Date Considered by Mayor & Cabinet	Scheduled Reporting Date	Slippage since last report
Integrated Transport – Bakerloo Line Extension – Sustainable Development Select Committee	ED Regeneration	October 20 2010	February 9 2011	Yes
Mortgage Rescue Scheme – Housing Select Committee	ED Customer Services	December 1 2010	February 23 2011	No

BACKGROUND PAPERS and AUTHOR

Mayor & Cabinet minutes, October 20 2010 and December 1 2011 available from Kevin Flaherty 0208 314 9327.

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MAYOR & CABINET		
Report Title	Youth Task Force	
Key Decision	Yes	Item 5
Ward	All	
Contributors	Executive Director for Resources (Head of Strategy)	
Class	Part 1	Date: 19 January 2011

1. Purpose

The purpose of this report is to consider the conclusions of the Youth Task Force.

2. Policy Context

The content of this report is made in the context of Lewisham's overarching Sustainable Communities Strategy though there is particular focus on the 'ambitious and achieving', 'safer', 'empowered and responsible' and 'dynamic and prosperous' themes of the strategy. The report also supports the Council's policy priorities and in particular it relates to the Children and Young People's Plan.

3. Recommendations

It is recommended that the Mayor:

3.1 notes the contents of the Youth Task Force report (appendix 1 to this report).

3.2 requests officers to explore options for implementing Task Force recommendations and to return to Mayor and Cabinet with a further report detailing implications and a delivery plan.

4. Background

4.1 In 2009, at the Council's Annual General Meeting, the Mayor highlighted the impact that the recession was having in Lewisham and in particular he noted the effect of the economic downturn on young people.

4.2 Figures from the Office of National Statistics show that as unemployment figures rise young people are disproportionately affected by the effects of economic recession. In response to the economic downturn, the Mayor established a Task Force to consider how Lewisham Council and its partners might take action to support young citizens. The group's remit was to assess the full implications of the recession on young people and consider some of the challenges arising as a result. Once the group had convened they went on to establish their own terms of reference, taking on board

the direction set out in their broad remit. The Mayor specifically requested that the Task Force be chaired by Pete Walsh, the ex-head of one of Lewisham's largest secondary schools.

5. Overview of Task Force activities

Details of the group's meetings are set out in their own report. The group met periodically from winter 2009 to late Autumn 2010. At each meeting the Task Force considered a different topic. The work of the Task Force was supported by officers in the Council. It is intended that the Chair of the Task Force will present the final report to the Mayor.

6. Legal Implications

Full legal implications for the implementation of Task Force recommendations would be included in a subsequent report to the Mayor, which is dependent on the decision made by the Mayor and Cabinet in relation to the recommendations at 3.1 and 3.2 of this report.

7. Financial Implications

Full financial implications for the implementation of Task Force recommendations would be included in a subsequent report to the Mayor, which is dependent on the decision made by the Mayor and Cabinet in relation to the recommendations at 3.1 and 3.2 of this report.

8. Crime and Disorder Implications

There are no direct crime and disorder implications arising from this report. However, the Task Force's report includes commentary on the effects of crime and disorder on young people.

9. Environmental Implications

There are no immediate environmental implications arising from this report.

10. Equalities Implications

There are no immediate equalities implications arising from the implementation of the recommendations in this report.

11. Conclusion

The Youth Task Force report sets out a comprehensive record of the work of the group over the previous year.

BACKGROUND PAPERS

Short Title of Document	Date	File Location	Contact Officer

If you would like further information on this report please contact Kevin Sheehan, Head of Strategy, on 02083146800

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1. Summary

At the Council's Annual General Meeting in April 2009, the Mayor reflected that rising unemployment and tight finances were making it much more difficult for young people to get into work. The global financial crisis, resulting economic recession and the current fiscal retrenchment is making it more and more difficult for young people to fulfil their potential and secure a prosperous future. Furthermore, increased competition within the labour market and demand for university places is also making it hard for young people to gain employment for the first time or continue into further education.

In previous economic recessions, the lack of co-ordinated and robust response at the local and national level led to an entire generation of young people being excluded from work, education and training opportunities. Research shows that this exclusion from the labour market and education can significantly increase the risk of young people becoming marginalised and socially excluded. Current economic conditions require a holistic and synchronised approach by the Council and its community partners in order to maximise available resources and ensure past mistakes are not repeated.

Faced with these economic difficulties and an increasingly challenging employment environment for young people, the Mayor established the Youth Task Force (YTF). It was composed of individuals with experience of: working with young people, representing youth organisations and the creative and cultural sectors. They were asked to investigate the challenges facing young people in the recession and to explore the opportunities, ideas and innovative practices which might inspire Lewisham's young generation (see Appendix 1 for the full list of YTF members).

The YTF was given a 12 month period from October 2009 to late September 2010 to conduct their work. External support for the group was commissioned via the Office of Public Management (OPM). The OPM facilitated the initiation of the YTF and the clarification of the terms of reference. They also continued to be active during the YTF work. The Council also provided officers to support YTF sessions and to liaise directly with YTF members.

In conducting its work, the YTF sought to be open-minded, forthright and innovative. The group focused on employment, training and volunteering for young people. A wide range of expert witnesses were invited to give evidence, including relevant senior officers within the Council and colleagues from frontline service providers, alongside local youth groups, representatives from the private sector, and people from the voluntary and community sectors. In order to form solid and purposeful recommendations that could be meaningfully implemented, the group analysed all the information presented, using discussions to focus, filter and refocus evidence through a process of iteration.

Key findings are organised under the following titles:

- Youth Led Approach – Securing Wider Engagement of Young People: The perception of young people and their role within the community.
- Volunteering – An Opportunity to Build Self-Confidence and Skills: The role of volunteering in young people’s development and the importance of community work in building stronger communities.
- Apprenticeships – Creating Opportunities for Young People: The career opportunities presented by apprenticeships, and the possibility of extending apprenticeships across public contracts in Lewisham.
- Social Enterprise – Developing New Prospects: The role of the social enterprise sector as a pathway for young entrepreneurs.
- Wellbeing – Constructing Resilience: The importance of safety, security and a sense of well-being for young people.

This report aims to give a comprehensive overview of the activities of the Youth Task Force. It details the terms of reference agreed by the YTF. It draws together qualitative and quantitative research on the local and national social, economic and political background shaping the issues facing young people in Lewisham. It outlines the discussions and deliberations that took place during YTF sessions and it presents the recommendations put forward by the YTF for the Council and Local Strategic Partnership to consider for implementation.

2. Recommendations

A) Youth Led Approach: Securing Wider Engagement of Young People

The Youth Task Force recommends:

- By building on established systems within the community, such as the Young Mayor, the Young Citizens Panel, local assemblies and area forums, the Council should explore how young people can increase their influence and actively participate in the decision-making process within those policy areas which directly affect their future prospects, health and well-being.
- The Council, youth-focused community stakeholders and young people should collaborate in the creation of a Young People's Charter for Lewisham. This charter should outline how young people understand their role as citizens of the borough, what the Council and its partners can do for them and what responsibilities they have towards the community.
- The Council, voluntary, faith and community groups should aim to strengthen the ambassadorial role of young people who contribute to their local community. Firstly, they should work with existing youth organisations and institutions, including the Young Mayor and the Young Citizens Panel, to enhance their presence and influence within the borough. Secondly, as young community activists and social entrepreneurs emerge, the Council's youth services and its partners should strive to reward and champion their achievements in order to create positive new role models. This could be accomplished either through existing awards ceremonies held by the council or new, specifically-designed events.
- Youth service providers within the community, including the voluntary and social enterprise sectors, work more closely with young people to capture their insights into the public sector and draw on these experiences to co-design services and improve delivery.
- The Council and youth service providers should explore options for creating a one-stop internet based communication portal to provide information about youth employment opportunities, volunteering and support services. This resource should be designed in collaboration with the Young Citizens Panel to ensure that it is relevant and attractive. The Young Mayor and other local publicity mechanisms

should then be used to maximise awareness and increase uptake. In developing this resource, it is anticipated that council officers would engage with young people to build upon existing social networks and utilise new other media.

- The Council and its community partners recognise that whilst voluntary groups, the third-sector and social enterprises are essential to tackling the economic and social problems facing young people, schools are best placed to ensure real progression is made in these areas and should have responsibility for promoting opportunities that exist for employment, training and educational in the local community.
- The council should develop an international exchange programme for young people through the Young Citizens Panel. Using the Council's international links gained from previous exchanges, project officers drawn from the panel would be responsible for approaching relevant youth councils, student unions or other citizen groups to secure an appropriate partner with whom to undertake the exchange. They would also need to secure funding both in the initial stages of the project and throughout the programme.

B) Volunteering – An Opportunity to Build Self Confidence and Skills

The Youth Task Force recommends:

- All possible avenues and techniques for emphasising the importance of volunteering are explored in order to foster positive attitudes towards the individual and community benefits. This should highlight its contribution to enhancing an individual's CV; its ability to build social and professional relations; the social networks it creates beyond a young person's familiar surroundings; and its potential role in improving the personal responsibility of young people and community cohesion.
- With London hosting the Olympic Games in 2012, the Council, schools, voluntary, faith and community groups should make it a priority that Lewisham's young people should be encouraged to become involved in the games and associated activities across the city, wherever possible.
- Public agencies should investigate the possibility of creating more work experience schemes and internship placements which match skills to job progression in order to create sustainable outcomes for young people.

C) Apprenticeships – Creating Opportunities for Young People

The Youth Task Force recommends:

- During the re-tender of Council contracts, due consideration be given to the provision of employment for apprentices as well as other opportunities including work experience, work shadowing, etc.
- Eligible contractors be asked to outline their capacity for the delivery of positions for apprentices and that this should be used as part of the tender evaluation process.
- The Council's current provision for providing apprentices should be used to support the deployment of apprentices into partner organisations.
- The Council consider 'matched funding' for the delivery of the apprentice programme in the third sector, whereby the Council funds one year of an apprenticeship on the provision that the other year is funded by the host organisation through their own funds or through the draw down of central government funding.
- The management and development of apprentices should be included in the Council's overall management of its contracts.
- The Leisure Services contract be used as the first Council contract to specify the uptake of apprentices in its tender documents. The contract is in the process of being developed and it is due to come into force in October 2011.

D) Social Enterprise and the Third Sector – Developing New Prospects

The Youth Task Force recommends:

- The social enterprise and third sector should work together to create a 'social enterprise mentoring academy'. This new service would provide advice and guidance to young people that encourages them to develop aspirations to start-up their own community schemes and business enterprises in the future. One essential function of the mentoring academy would be to forge links between businesses, professionals and those in the creative industries, and to pass these onto young people struggling to make their first business and industry contacts.

- The Council and its community partners should explore methods of broadening the commissioning of public services to extend their capacity to make use of the creative and cultural sectors such as UK music, sports and leisure industries. The social enterprise sector should also be encouraging young people to explore potential growth areas in the coming years, such as elderly and personal care.
- As the focal point of the local community, the Council should facilitate the creation of a forum for the third-sector and social enterprises to share success stories and evidence of what works in the local community. This will allow these sectors to improve the services they provide to young people by forming a framework of best-practice, and help avoid duplication of services. Moreover, it should also explore how the role of the social enterprise sector can be extended and expanded.
- Given the massive investment from the Building Schools for the Future programme, schools should be encouraged by the Council to open their new facilities to the wider community to create opportunities for social enterprises and the third-sector to make use of them. Given the economic climate surrounding education funding, schools should also investigate the possibility of creating commercial relationships with these sectors to make it economically viable for them to offer the use of their amenities.

E) Wellbeing – Constructing Resilience

The Youth Task Force recommends:

- The Council should create a specific support system for young people facing stress, depression, isolation and pressure at school. It is vitally important that our young people are equipped to deal with stress, anxiety and depression. Access to information about mental health should be readily available at schools and (where feasible) teachers should receive specialist training from the borough's mental health experts on how to help young people deal with well being and mental health issues.
- The Council and its community partners should work more closely with schools to ensure young people are given information and advice on issues which concern them. For instance, an information programme could be designed and led by young people as they are best positioned to relate to other young people about issues

affecting their generation. This work could be developed alongside third sector partners and the local NHS.

- Creating more opportunities for inter-borough and regional initiatives that encourage young people to travel and feel safe without fear of crime or attack. This should include the Council continuing to support and development the London Citizen's Safe Haven's project.

3. Terms of Reference

The aim of the Task Force was to identify the issues and challenges faced by young people which prevent them from fulfilling their full potential as active citizens who are able to contribute to strong and cohesive communities. The YTF agreed a programme of work which would enable the them to explore how all local public agencies, community groups, voluntary organisations and other stakeholders should work together to engage young people and ensure they have access to the best possible opportunities. The YTF terms of reference set out areas of focus for the group. It was decided to:

- Explore ways to develop opportunities for young people to gain training, work experience and employment opportunities.
- Investigate how the ways in which young people approach employment and training opportunities might be enhanced by raising their own self esteem and attitudes towards their role in society.
- Look at ways to support young people to fulfil their potential.
- Consider how best to encourage young people to be positive role models in their local communities and beyond.

4. Young People in Lewisham and the Challenges They Face

In order to understand the continuing impact of the recession on young peoples' opportunities, the YTF spent a considerable amount of time researching the current situation in Lewisham. Gathered through presentations to the YTF and additional research, the information presented below on youth unemployment; labour market conditions; the cost of social exclusion; levels of local deprivation; educational attainment and qualifications levels; has fed into, and influenced, the final recommendations.

Youth Unemployment Nationally

Young people continue to be negatively affected by the effect of the recession in the private sector and the subsequent spending cuts in the public sector. In the 1990s recession employment rates for young people not only fell faster than for any other age group but also took longer to recover. Young people tend to be seriously disadvantaged by recession because, as uncertainty increases, organisations stop employing staff.

This pattern is reflected in the national unemployment figures from 2008 to the first quarter of 2010. By the end of 2008, 28% of 16 and 17 year olds were unemployed. In the first quarter of 2009, redundancy rates for younger workers were almost double those of workers aged 25–49. By the end of 2009, in total there were 952,000 16-24 year olds unemployed nationally; which represents a significant percentage of all those unemployed.

The recession and its subsequent repercussions on the labour market continues to be felt by the young. There were 728,000 18-24 years old unemployed in the three months to August 2010, up 16,000 from the three months to April 2010.¹ Of these, 342,000 were long-term (over 12 months) unemployed; a figure that has doubled since March 2008. The amount of young people who are not in full-time education or training has risen since January 2008 by 159,000 or 13.1%.² It is estimated that in the past year the number of young people aged between 18-24 that are unemployed for more than 6 months has increased by 21%, with 142 local authorities across the UK witnessing increases compared to just 78 where it has fallen.³

Youth Unemployment Locally

In Lewisham, as the recession peaked between April 2008 to March 2009, unemployment for 16-24 year olds stood at 5,500, which is one of the highest numbers throughout the London boroughs. In August 2010, there were 2,135 18-24 year olds who were

¹ Office for National Statistics. *Labour Market Statistical Bulletin - September 2010*. <http://www.statistics.gov.uk/pdfdir/lmsuk0910.pdf> and Office for National Statistics. *Labour Market Profile: Lewisham*. <http://www.nomisweb.co.uk/reports/lmp/la/2038431868/report.aspx>

² Centre for Social and Economic Inclusion. <http://www.cesi.org.uk/statistics>

³ Trade Union Congress. <http://www.tuc.org.uk/extras/youthunemploymentJune2010.pdf>

unemployed, which represents a rise of 155 JSA claimants on the previous month.⁴ The situation is continuing to worsen in the local community, as it is across London.⁵ The current figures have not reached the peak of 2,500 in September 2009 (the highest since October 1997).⁶ Nonetheless, the continuing upward trend in youth unemployment is worrying and it may continue to worsen as public finances tighten.

Labour Market Competition

One of the consequences of increasing unemployment amongst the whole population is that 16-24 year olds have to enter a fiercely competitive labour market. Figures submitted by the Council to the YTF reveal that increased competition for jobs over the next five years is likely to disproportionately affect new entrants into the labour market. Lewisham has a far lower employment rate for 20-24 year olds (52.4%) compared to the overall working age population (71.4%); graduate jobs are becoming increasingly competitive with 69 applicants per job compared to 49 in 2009, 31 in 2008, and 28 in 2006; unemployment amongst graduates increased from 11% to 14% between 2006-2009. Moreover, changes to the benefit system will also increase competition for vacancies as the government seeks to move more claimants off Disability Alliance to JSA by 2015, possibly creating an additional 7,500 jobseekers in Lewisham.

Recent labour market research indicates that school-leavers and graduates will have a difficult task finding employment. It showed that only 14% of employers plan to hire 16–17-year-old school-leavers whilst only a third say they will employ school leavers aged 18 and less than half plan to hire a graduate. These figures are even more worrying considering that these statistics for young people are no better than those presented during the period of negative growth during 2009. The body that conducted the research concluded that even with the recovery under-way (according to official figures) weak growth and increased competition in the labour market is severely hampering the chances of young people.⁷

⁴ Office for National Statistics. *Labour Market Profile: Lewisham*.

<http://www.nomisweb.co.uk/reports/lmp/la/2038431868/report.aspx>

⁵ Office for National Statistics. *Aged 18-24 – London Comparison*

http://www.nomisweb.co.uk/reports/lmp/la/2038431868/subreports/jsaad_compared/report.aspx

⁶ Office for National Statistics. *Aged 18-24 - long time-series Lewisham (1992-2010)*

http://www.nomisweb.co.uk/reports/lmp/la/2038431868/subreports/jsaad_time_series/report.aspx

⁷ The Chartered Institute for Personnel and Development (CIPD). *Labour Market Outlook. Quarterly Survey Report, Spring 2010 and Labour Market Outlook. Quarterly Survey Report Summer 2010*.

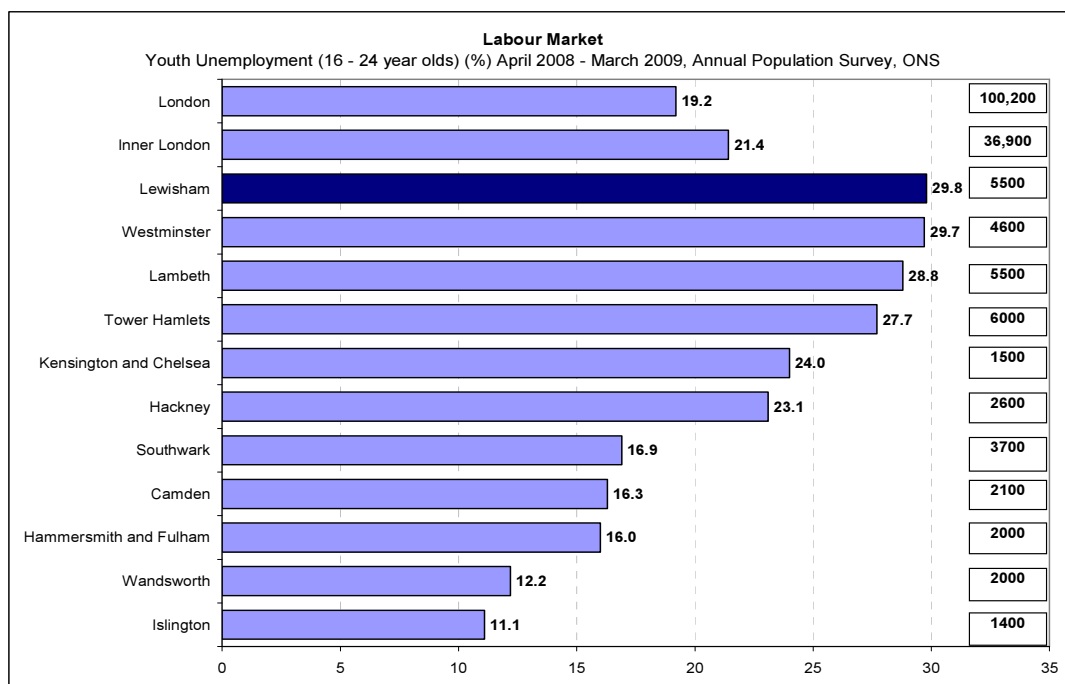
The uncertainty over the economic recovery, looming public sector cuts, the continuing growth of youth unemployment, and intensified competition in the labour market is problematic for Lewisham's young workforce. Previous recessions have left sections of the community excluded from the labour market and the possibility of losing a generation of young citizens to unemployment and disadvantage due to lack of opportunities in the labour market was of serious concern to Task Force members.

JSA Claimants to Vacancy Ratio, Inner London, May 2010

Local authority	JSA claimants	Vacancies	Claimant: Vacancies ratio
Hackney	9,663	404	23.9
Haringey	9,910	13.9	14.2
Lewisham	9,196	662	13.9
Waltham Forest	8,596	692	12.4
Lambeth	11,631	3,202	11.8

Source: Trade Union Congress Analysis of Office for National Statistics Labour Market Statistics, May 2010.

Youth Unemployment, Inner London Boroughs, April 2008 to March 2009



http://www.cipd.co.uk/NR/rdonlyres/D9A7378B-4364-4575-8083-D58BAD9D9785/0/5221_Labour_Market_Outlook_Spring_2010.pdf

London Borough Comparison Youth Unemployment 18-24 Year Olds – August 2010

Source: Office for National Statistics Official Labour Market Statistics, August 2010

London Borough	Total Number	% of total JSA Claimants
Tower Hamlets	2,830	27.7
Croydon	2,665	27.9
Newham	2,615	25.9
Enfield	2,360	26
Southwark	2,260	23.1
Lambeth	2,230	20.3
Haringey	2,150	22.2
Lewisham	2,135	22.7
Hackney	2,030	20.8
Greenwich	2,005	26.9
Waltham Forest	2,000	23.8
Ealing	1,960	22.5
Brent	1,940	21.2
Redbridge	1,765	26
Barking and Dagenham	1,665	28.1
Islington	1,630	22.8
Barnet	1,455	22.1
Hillingdon	1,425	26.3
Bromley	1,340	25.5
Havering	1,340	27.3
Hounslow	1,330	26.3
Wandsworth	1,265	20.7
Bexley	1,225	27.8
Camden	1,160	21
Hammersmith and Fulham	1,050	21.6
Harrow	1,015	24.7
Westminster	980	19.6
Merton	895	24.5
Sutton	840	25.7
Kensington and Chelsea	570	17
Kingston-upon-Thames	470	23.3
Richmond-upon-Thames	430	20.7
City of London	30	34.5

Consequences and Costs of Youth Unemployment

The experience of unemployment can have serious lasting effects on the economic and social prospects of young people. Independent research indicates that the recessions of the 1980s and 1990s, and subsequent rises in youth unemployment (30.8% in 1981), severely affected the future employment prospects of those exposed to the poorest labour market conditions.⁸ Moreover, according to the Department for Education, a young person not in employment, education or training (NEET) is thought to cost the public £97,000 on average over their lifetime in resource and public finance costs.⁹

If unemployment and youth inactivity persist, the effects of social exclusion can become exacerbated. Recession and unemployment negatively affects emotional welfare and mental health as well as financial security and wellbeing. Conditions arising from, or made worse by, economic recession range from worry to clinical depression and anxiety, which have a negative impact on confidence and self esteem. In a presentation to the Task Force, a Childrens' mental health expert from the South London Maudsley NHS Foundation Trust outlined some of the contributing factors to mental health problems – key among these are: work, family situation and education. Furthermore, they summarised the various risk factors as well as protective elements in people's lives which contribute to mental health. For instance, you are less likely to suffer from mental health problems if you: display a positive sense of discipline; have supportive social networks; live in good housing and engage in a range of sport and leisure activities.

Alongside the decline in physical and mental well-being, unemployment and social exclusion may be linked to increased crime rates. Three in every 10 men and 1 in 12 women who had been NEET between 16 and 18 are involved in criminal activity before they are 30, which is three times the general population rate.¹⁰ Socially excluded young people also become the victims of crime. Young people, especially those experiencing poverty and unemployment, stand a far greater chance of being the casualties of knife

⁸ Centre for Analysis of Social Exclusion. *The Class of '81: The effects of early-career unemployment on subsequent unemployment experiences*, London School of Economics, December 1999.

<http://sticerd.lse.ac.uk/dps/case/cp/CASEpaper32.pdf>

⁹ Statistic Obtained from Confederation of Business and Industry,

<http://www.cbi.org.uk/ndbs/press.nsf/38e2a44440c22db6802567300067301b/bc2bef176a3c6580802576190035f9fc?OpenDocument>

¹⁰ Confederation of British Industry,

<http://www.cbi.org.uk/ndbs/press.nsf/38e2a44440c22db6802567300067301b/bc2bef176a3c6580802576190035f9fc?OpenDocument>

crime. According to the 2006–2007 British Crime Survey (BCS), the risk of becoming a victim of violent crime is 3.6% for a British adult. However, the available figures for children and young people provide a striking and stark contrast. For young men aged 16 to 24 the risk was almost four times greater: 13.8% experienced a violent crime of some sort in the year prior to their BCS interview. Moreover, people who are unemployed have a BCS violence victimisation rate more than double the national average, and those living in ‘hard pressed’ areas are also over twice as likely to be victims of violence than those in wealthier areas.¹¹

Some of the most pioneering work on youth unemployment was commissioned by the Princes Trust in 2007. Its report, ‘The Cost of Exclusion; Counting The Cost Of Youth Disadvantage In The UK’ provides evidence on both the economic and social costs of youth unemployment and crime. The key findings are summarised below:

The Cost of Youth Unemployment

- In 2007, before the recession, almost a fifth of young people in England, Scotland and Wales were not in education, training or employment. OECD data showed that the UK compares very poorly to other countries in this respect.
- The productivity loss to the economy as a result of youth unemployment is estimated at £10 million every day (£4.7 billion per year) and this is without taking into account people who are classified as ‘inactive’ for other reasons.
- There is also a substantial cost to the exchequer of youth unemployment and inactivity: it costs the state around £20 million per week in Job-Seeker’s Allowance.
- The personal cost of not being in education, training or employment goes beyond foregone earnings in the longer term: youth unemployment has been estimated as imposing a wage scar on individuals of between 8% and 15%.

The Cost of Youth Crime

¹¹ Justice for Crime and Justice Studies. ‘*Knife Crime*’ A review of Evidence and Policy. www.crimeandjustice.org.uk/opus439/ccjs_knife_report.pdf

- The estimated total cost of youth crime for Great Britain was in excess of £1 billion in 2004.
- The rate of imprisonment is higher in England and Wales than in 12 other European countries. England and Wales also have the highest percentage of prisoners under 18 and the second highest percentage between 18 and 21.
- Prisoners are much more likely to be socially excluded than the general population: they are 13 times as likely to have been in care as a child; 13 times as likely to be unemployed; 10 times as likely to have been a regular truant; and 2.5 times as likely to have had a family member convicted of a criminal offence.

The Cost of Educational Underachievement

- There has been little change since the mid-1990s in the percentage of young people aged 16-24 with no qualifications. In 2005, these figures stood at 12.6%, 12%, 8.3% and 19.9% in England, Wales, Scotland and Northern Ireland.
- The percentage of young people with low-level or no qualifications in the UK compares very unfavourably to France (for all age ranges) and Germany (for the age range 25-28 and older categories).
- There is some evidence of a relationship between education and health outcomes. The education of parents can affect the educational outcomes of their children.
- Educational underachievement affects the relative performance of the UK economy. The UK has between 10% and 25% lower output per hour than France, Germany and the US and much of this can be attributed to a poorer level of skills and a shortfall of capital investment.
- There is a strong relationship between educational underachievement and crime. US evidence suggests that social benefits from a one per cent increase in the high school completion rate are equivalent to 14-26% of the private return. Applying these estimates to the UK (with strong caveats) suggests that this might be equivalent to £2-5 billion.

- UK evidence on the effects of the Education Maintenance Allowance and the Reducing Burglary Initiative suggest that programmes like these can lead to savings of about £3,595-£4,902 per 1,000 pupils because of reduced levels of crime.¹²

One of the central contentions of this report is that the costs of exclusion are economically and socially inefficient. The YTF maintained that interventions in helping young people into work, to remain in education or avoid crime represent excellent value for money given the measurable costs of social exclusion. With financial resources becoming increasingly limited in the foreseeable future, the challenge is to combine large-scale employment and training programmes for the majority with specialist support for the most vulnerable young people.

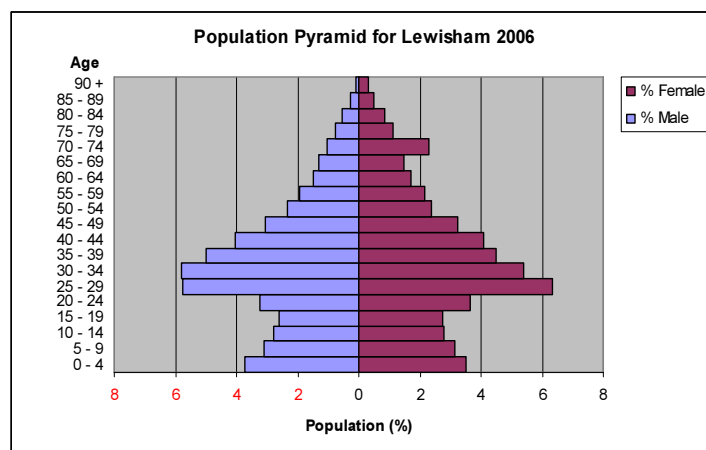
The YTF also considered the wider impacts of recession and economic turmoil on young people. Although the main focus of discussions was on work and education, members were concerned that the effects of poverty, anxiety, stress and depression will begin to harm the mental health and well-being of young people in the longer term. As well as apprenticeships, training, educational opportunities and job creation schemes young people require easy access to support, mentoring and advice to ensure that recession and cuts in public services do not permanently damage this entire generation of young citizens.

Population of Lewisham

Lewisham is the second largest inner London borough and is home to approximately 255,000 people, with projections suggesting that the borough will grow significantly by 2026.

Lewisham has a slightly younger

age profile than the rest of the UK. Children and young people aged 0–19 make up 24.5% of our residents, compared to 22.4% for inner London and 24.4% nationally. Lewisham has 35,800 pupils in its school system. Whilst 40% of residents are from black and minority



¹² The Prince's Trust. *The Costs of Social Exclusion; Counting the Cost of Youth Disadvantage in the UK*, <http://www.princes-trust.org.uk/PDF/Princes%20Trust%20Research%20Cost%20of%20Exclusion%20apr07.pdf>

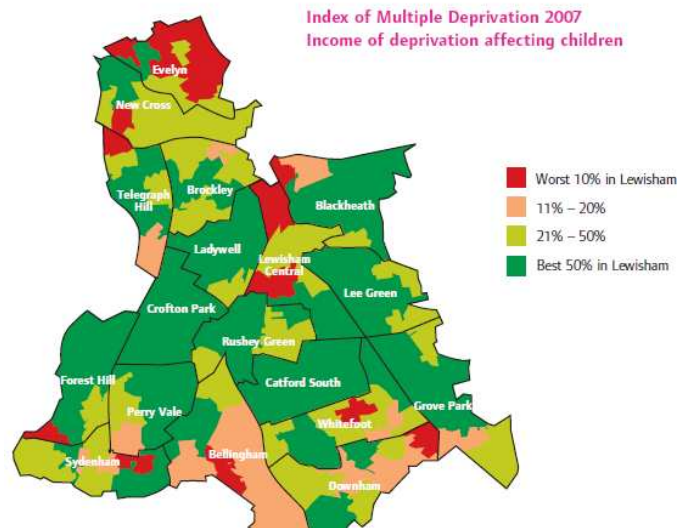
ethnic backgrounds, this rises to 72% within the school population, where over 170 different languages are spoken by pupils.¹³

Deprivation within Lewisham

Lewisham is facing increased levels of deprivation over the coming years.

The 2007 Index of Multiple Deprivation ranked Lewisham 39th out of 354 local areas in England compared to a rank of 57 in 2004.

On the specific indicator of income deprivation affecting children, 38 (out of 166) of Lewisham's super output areas¹⁴ are in the 10% most deprived in the country.



Child poverty is rising across London with 51% of children in inner London living in poverty. More than a quarter of all Lewisham's pupils are eligible for Free School Meals: 26.6% of primary school pupils, 25.7% of secondary school pupils and 44.3% of special school pupils, compared with national figures of 13%, 10% and 28% respectively. Lewisham has 34% of workless families with children under 5 years old, 10% above national figures. Some areas of Lewisham have even higher levels with 45% in Evelyn, 42% in Downham and 41% in Bellingham. Low income families' take-up of child care has increased to 28% from 25% in 2005 – this is above the national average of 17% and similar local authorities at 22.5%.

Other social exclusion issues that have an impact on the future prospects of young people, such as accommodation and overcrowding, are key issues for Lewisham; the housing needs data shows that 10% of households are overcrowded and this increases when considering BME households. For example, 20% of Black African households are overcrowded. As of 19/1/09 there were 3283 households that were overcrowded on the

¹³ Lewisham Council. *Children and Young People's Plan, 2009-2012*, <http://www.lewisham.gov.uk/NR/rdonlyres/E2C06A8A-DFAD-4D30-838C-5A1D7D375B68/0/CYPplan1.pdf>

¹⁴ Super Output Areas are a geography designed for the collection and publication of small area statistics. <http://www.neighbourhood.statistics.gov.uk/dissemination/Info.do?page=aboutneighbourhood/geography/superoutputareas/soa-intro.htm>

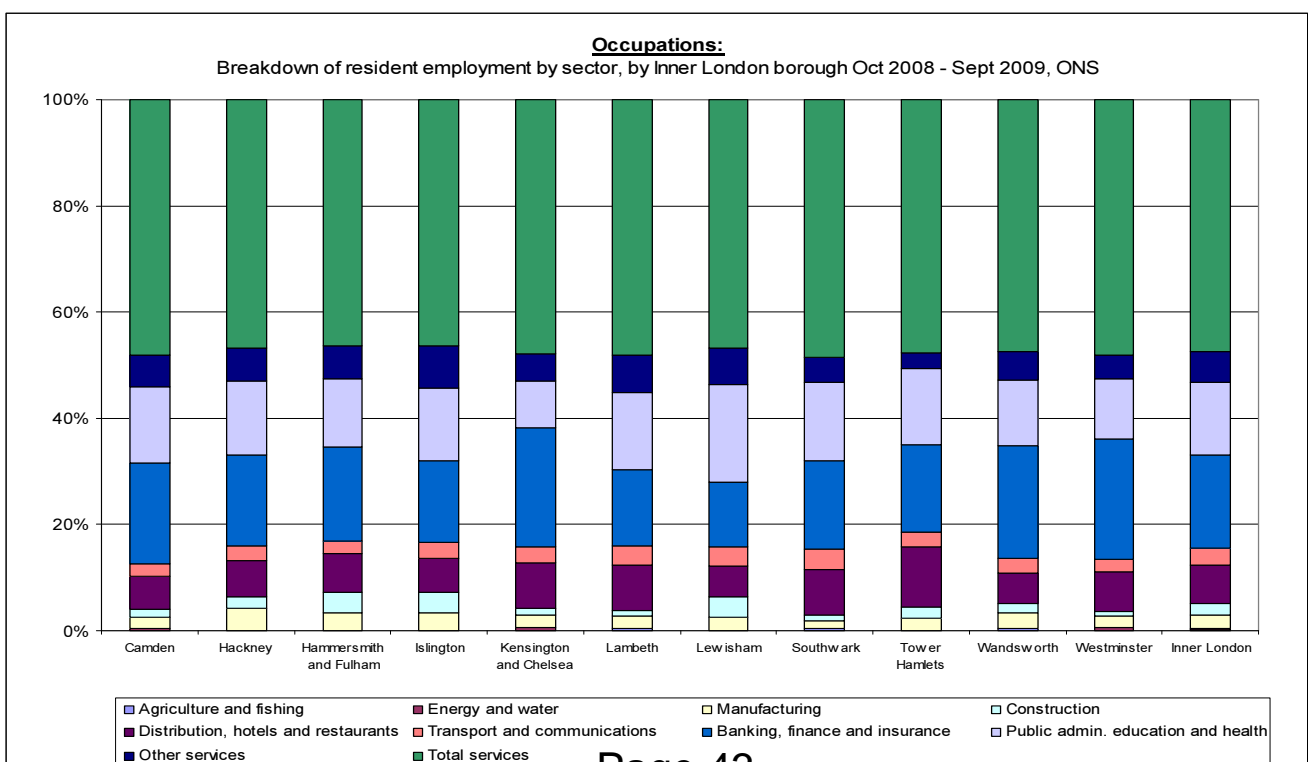
housing register. In 2007/08, 8% of residents accepted as homeless were young people aged 16 and 17 years, which is slightly below the national average. The numbers of young people presenting at the Council for advice and assistance on housing issues remains high, with 16 and 17 year olds comprising over 50% of all enquiries from single households.

Source: Children and Young People’s Plan 2009-12

Occupations of Lewisham Residents

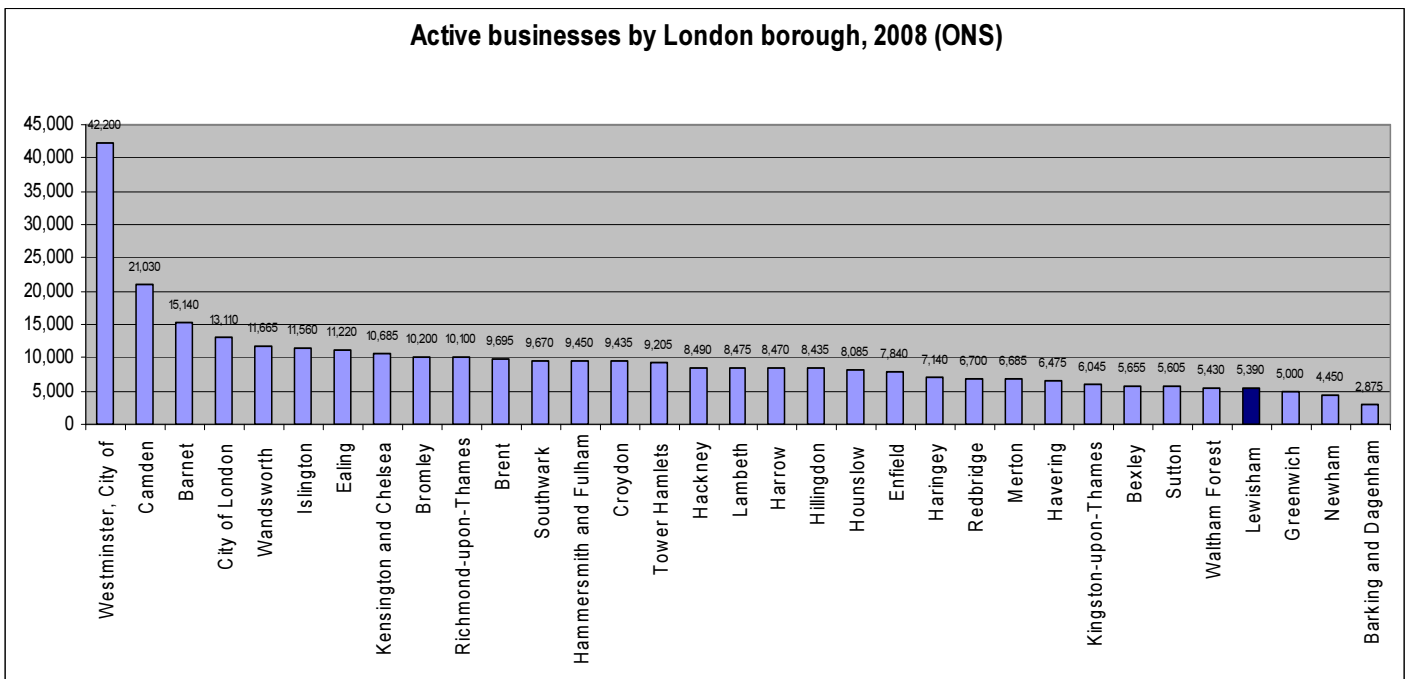
Lewisham has the second highest proportion of residents in inner London in “lower skilled” occupations. Lower skilled sectors include the administrative and secretarial, personal services, sales and customer services, and process and machine operatives. At 33% Lewisham has a greater proportion than the inner London average of 26% and nearly double the rate in Camden of 17%. Lewisham has the lowest proportion of inner London residents in managerial and professional occupations. At 32% Lewisham has the lowest proportion of working residents in the highest skilled occupations. The inner London average is 40% and in six boroughs 40% or more of working residents are in such jobs.

The chart below shows the breakdown of resident employment – by sector of employment – for each of the inner London boroughs. Patterns vary across inner London, but it is clear



that Lewisham has the smallest proportion of residents working in banking, finance and insurance, and the highest proportion working in public administration, education and health. It has broadly average levels for most other sectors, with the exception of construction. More Lewisham residents work in construction than in any other inner London borough.

Mirroring the reliance on public sector employment in the borough, the chart below shows that Lewisham has the second lowest number of active businesses in Inner London. The size of the borough's economy is ranked 30th out of the 33 London boroughs. London's growth in the past 20 years has been concentrated in the finance and business sectors. These growth sectors are underrepresented in Lewisham. Instead growth in Lewisham has been concentrated in the public sector which now represents 34% of all employment.



Future Prospects for Employment in Lewisham

It is expected that around 490,000 public sector workers could lose their jobs by 2014-15, and up to 600,000 by 2015-16 (earlier leaked projections put the figure between 600-700,000). Others have predicted that the figure could be as high as 750,000 by 2015.¹⁵ Lewisham has the highest proportion of public sector workers in South East London and is

¹⁵ Chartered Institute for Personal Development statistics obtained from, <http://www.financemarkets.co.uk/2010/06/10/cipd-warns-of-high-unemployment-amid-government-spending-cuts/>

therefore likely to be disproportionately affected by public sector retrenchment. There is likely to be a fall in public sector employment amongst Lewisham residents of over 7,000 in the two years from 2011. This compares to a rise in JSA claimants of around 3,500 during the last two years, following recession in the private sector. £9m was spent in Lewisham on mitigating the effects of the recession - £7m from government and £2m from the Council.

At present it is unclear which types of jobs will be worst hit within the public sector. Although it is largely believed that the private sector recession is now over, public sector retrenchment is likely to have a substantial impact on private sector employment because of the reliance on contracts from the public sector (estimated by the OECD to be 25% of all public sector spending). Early projections suggest that this will lead to 600-700,000 jobs being lost over the next five years in sectors such as; catering, maintenance and repairs, back office support, building and construction, recruitment, training and development, and ICT (equipment, leasing and consulting).

Although job-losses in both the public and private sectors ultimately limit the opportunities open to young people, the latter will have less effect as only 8.6% of the national public sector workforce is below 25, and in Lewisham for example only 3% of council employees are below this age.

Qualifications of Lewisham Citizens

Qualifications and skills levels in Lewisham are low, by both London and national standards. In December 2007, Lewisham was ranked 322nd out of 354 in Britain. At the lower end, however, qualification levels amongst Lewisham's working age residents compare reasonably well with inner London. Only 9.5% of Lewisham's working age population have no qualifications – below the inner London average of 12.5%. The proportion of residents with qualifications at NVQ1 and above and NVQ2 and above are higher than the inner London averages.

However, qualification levels compare less well at the higher end. The proportion of Lewisham's working age population with qualifications at NVQ3 and above (55%) is marginally below the inner London average of 55.8%. Only 39.6% of Lewisham's working

age population have qualifications at Level 4 or above – the third lowest level in inner London. As skills levels within inner London boroughs are higher than Outer London, however, Lewisham is above the London average even at NVQ4 level.¹⁶

Qualification Level	Lewisham Numbers	Lewisham %	London %	National %
NVQ4 and above	70,100	39.6	38.6	29.0
NVQ3 and above	97,300	55.0	51.6	47.0
NVQ2 and above	117,400	66.4	63.8	65.2
NVQ1 and above	134,700	76.1	73.7	78.9
Other qualifications	25,600	14.5	14.2	8.7
No qualifications	16,800	9.5	12.0	12.4

Attainment in Lewisham's Schools

The past few years have been a period of improvement in educational attainment for young people in the borough. At Key Stage 2, for pupils achieving Level 4 and above in English, there has been an improving trend of performance for the last five years, from 73% in 2003 to 79% in 2008. In Maths there has been a 7% increase in the last five years and a 4% increase in Science over the same period. Lewisham equals comparator authorities' performance in English and is above in Maths and Science. Results are only 2% and 1% below the national average for English and Maths, which shows sustained improvement, with further improvement anticipated through focused intervention.

In 2008, 60% of Lewisham's pupils achieved five A* – C GCSE grades which was a 20% rise over five years. 46% of Lewisham's pupils achieved over five A*– C GCSE grades including in English and Maths in 2008. This was a 14% increase over the previous five years taking it towards the national average of 47.6%. Continued progress during the past two years seen this national average be succeeded with 47% and 48% achieved in 2009 and 2010 respectively.¹⁷

Source: Lewisham Council,

<http://www.lewisham.gov.uk/NewsAndEvents/News/GCSEResults2010.htm>

¹⁶ Office for National Statistics Official Labour Market Statistics, May 2010

¹⁷ Lewisham Council, <http://www.lewisham.gov.uk/NewsAndEvents/News/GCSEResults2010.htm>

Lewisham has made it a priority to improve the educational standards of those groups of pupils who are identified as underperforming, and suffering from social exclusion. 10% of Lewisham's Looked after Children now achieve five A*– C GCSE grades, including in English and Maths. Whilst this is above the national performance it is far lower than their peers. Lewisham's Black Caribbean boys who take free school meals have improved their performance at GCSE five A* – C grades from 16% in 2003 to 40% in 2008, and performance is moving closer to that of all Lewisham boys. 13.6% of Lewisham's Looked after Children are absent from school for over 25 days per year, a significant improvement from 25.6% in 2006 but still not reaching to the borough target of 11%. As of March 2008, 7.5% of pupils were persistent absentees from secondary school. In March 2009, analysis of latest persistent absence data showed that Lewisham has the fastest improvement rate in the country for reducing persistent absence.

Source: Children and Young Peoples Plan 2009-12

Further Education in Lewisham

Lewisham has made significant progress by nearly halving the number of 16–18 year olds who are NEET from 10.3% in 2005 to 5.5% in 2009. However, 65.7% of Lewisham's care leavers are now NEET at age 19. Although this is better than the national average it is slightly below comparator authorities performance of 68.5%. It is clear more work needs to be done. In 2008 Lewisham achieved a 98.5% success rate at A level grades A to E, 1.3% higher than the national figure. Within this the percentage of candidates receiving three or more A grades (4.7%) was the best performance across similar authorities. In the most recent results, Lewisham remains above the national advantage for A* to E with a 98.4% pass rate.¹⁸

Source: Lewisham Council.

<http://www.lewisham.gov.uk/NewsAndEvents/News/Alevels2010.htm>

¹⁸ Lewisham Council. <http://www.lewisham.gov.uk/NewsAndEvents/News/Alevels2010.htm>

The borough also performs better than the inner London average for points per entry at Level 3 and again better than most of its statistical neighbours, thus ensuring its learners are better placed to move on to higher education. 64% of 19 year olds achieve a Level 2 qualification and 41% achieved a Level 3 qualification, which is below statistical neighbour averages of 66.6% and 44.4% respectively. These gaps with statistical neighbours follow a similar trend over time, but with the increasing GCSE results for Level 2 at age 16, this sets a firm platform for further increases for these young people by age 19. 90% of all Lewisham's Year 11 pupils stay on to further education, 10% higher than the national average. In 2007, 90% of Lewisham's young people stayed on for Level 3 courses with approximately 86% of these young people going on to university. 60% of Black Caribbean young people achieving Level 3 qualifications go on to university.

Source: Children and Young Peoples Plan 2009-12

5. Discussions and Deliberations

Peter Walsh, YTF Chair

'We need to present proposals to the Council which are achievable – and we need to make sure the Council and its partners continue being accountable – if the Council and its partners accept our timeframe – and to be held accountable – we need to know what will have happened in a year'.

During the course of the past 12 months, the YTF received a range of information from different public, private and community service providers within Lewisham. To maintain focus and direction it was decided that each of the YTF evidence sessions should have an overarching theme. Whilst the specific recommendations are reflective of the content of the discussions that took place during these individual meetings, additional ideas raised in other meetings, as well associated material concerning local and national policy developments, were also taken into consideration.

A) Youth Led Approach: Securing Wider Engagement of Young People

Setting out the terms of reference, the YTF decided that an essential feature of the of their work should be to seek answers to the following points.

- In what ways can trust and interaction be encouraged between generations to help young people engage more with the community?
- How can young people foster and build a culture of responsibility to each other and the wider community?
- What can be done to empower young people and help them create a positive image of themselves?

In order to find answers to these questions, the YTF wanted to investigate how to improve youth community and intergenerational engagement as well as the formal protocols used to inform young people about local services and opportunities. In February 2010 four members of the Young Citizens Panel (YCP) were invited to the YTF session to discuss the problems young people face in these areas.

Reaching Out to Young People

What emerged early on in the question and answer session was that one of the key barriers stopping young people from engaging in the community actively and realising the opportunities for self-improvement, was that there is insufficient consideration given to how young people communicate in the 21st century. The Council and other public sector agencies websites do not tend to be places that young people visit in order to gain information. The YTF contended that the personal touch of direct interaction with people was of most importance for passing on information. Additional evidence presented to the YTF suggested communication was a major problem. In April, speakers from one of the borough's community housing organisations expressed concerns over a lack of 'out-reach to young people'. Creating an 'open access' approach, where young people could gain information on demand was suggested as a possible solution to what they regarded as a tendency to 'switch on and switch off' with young people. Task Force members felt that there is a distinct lack of places for young people to socialise, share ideas, and build on positive experiences. The YCP also expressed concerns over how effective the Council

and its partners were in engaging with them. They suggested the following measures be considered by the YTF to tackle this:

- Going directly to young people in accessible places such as schools and youth clubs as well as developing the capacity to send street teams to central places such as Lewisham Town Centre where young people congregate.
- Approaching young people via activities such as sports.
- Approaching housing estates where many young people do not access other services and can often be excluded and left out. Realising the need to overcome the stigma and fear associated with estates.
- Making communications interesting and appealing for young people.

Visibility and Communication

The lack of visibility relating to projects for young people was a major source of concern for the representatives of the Young Citizens Panel. Views were expressed to the YTF that projects were not always visible to young people. It was maintained that services were only accessed because of word of mouth and young people may often miss opportunities because of this. They suggested that growth and popularity of social networking sites such as Facebook and Twitter could be an avenue the YTF might explore. One YTF member also implied that there was a lack of communication, connections and linkages between services and this could be overcome through a social networking site. The YCP suggested that face-to-face contact wasn't always suitable for young people and the creation of a Lewisham wide social networking site (or space within a larger website) was a possible solution to overcoming the visibility and communication barrier if:

- It was young person led and attractive to its target audience. It was to be community run and based.
- It was youth led with a motivated steering group.
- It was a one stop shop. Despite it being the duty of the local authority to produce a directory of all youth services, there seems to be a lack (in the borough) of a central point of information.

There was also a discussion about using the Young Mayor's budget for advertising the activities currently on offer for young people in the borough. Concerns were raised over this idea. Whilst it was agreed that better communication which relates to young people (alongside more accessible information) was necessary, it was believed Council officers were the wrong people to steer it. Task Force members indicated to the YCP that Lewisham may be interested in a proposal from them with costing for a social networking site that could be used for information sharing.

Getting Young Peoples Voices Heard

Incorporated into the debate about appropriate and effective communication with young people was a discussion about encouraging young citizens to make the most of opportunities to become involved in the design and delivery of local services. The young people from the YCP were asked if they felt their voices were being heard:

- The YCP was already attempting to influence service providers, working closely with the health service who have been conducting question and feedback sessions. Moreover, the YCP have partaken in ongoing consultation with organisations, noting that they would not stay involved with the YCP if they didn't get their voice recognised in the delivery process. The panel are very committed and therefore people take them seriously and they see results.
- Their involvement in Lewisham People's Day was a positive example of influence. Every year they undertake the auditions and feel fully engaged and involved in the organisation of it.
- Frankie Sulke (Executive Director of Lewisham's Children and Young People's Directorate) had also asked them to interview for positions in the Youth Sector.
- Every year they were being to become increasingly more involved in activities, leading to a parallel growth in their influence. It was felt this could lead to other opportunities for young people.

The YTF wanted their recommendations to reflect their support for type of youth participation work taking place in Council projects such as the YCP. It was felt the Young Citizens Panel should not be removed or changed. Rather, the YCP should be supported

and celebrated because it is vital that the 900 young people who are part of the YCP are further involved in the improvement, development and delivery of services.

Broadening Horizons

It was suggested by Task Force members that increasing the ability of young people to engage with service providers and the wider community would require an avenue or conduit for change that would allow young citizens to broaden their horizons. It was felt that one of the major barriers to some young people participating fully in society was the narrowness of the options which appear to be available. The YCP was keen to stress that young people had a tendency to adopt a tunnel vision when looking at different locations for employment, volunteering and training opportunities.

- Some young people might not bother to look for work outside of their area. Other young people would rather go to Docklands for work than go to Deptford as they would feel more comfortable doing so.
- Many young people do not think outside of their area and may have a narrow mindset. Young people need to experience different places, cultures and lives.
- There need to be opportunities created for young people to network outside of the borough to help with their confidence and open their minds.
- Young people could potentially learn a lot from experiences outside of their area and outside of the country. The opportunity to visit different countries could help young citizens to realise how much opportunity there is in the UK compared to many other countries.
- Young people should be given more information and knowledge about life outside the UK.

In a presentation by representatives from Widehorizons, a young people's outdoor education trust, the benefits of broadening the experiences of young people were put to Task Force members. Widehorizons dedicates a portion of its budget to expanding the traditional horizons of young people through intergenerational activities. They outlined their work to create awareness amongst different generational groups about the problems facing young people; encouraging different groups to work together in a productive way to

challenge assumptions and encourage positive communication. They seek to help young people experience things outside of their comfort zone in order to encourage self-reflection and to help young people develop self-awareness.

Youth Exchanges

The possibility of developing a Lewisham based international exchange was discussed. One YTF member talked about a project that he worked on which took gang members from Roehampton to Kenya. It was felt that this helped to change the lives of those involved. It was suggested by members of the group that young people could be given the opportunity to live or spend time in different boroughs and cities throughout the UK as well as in other countries.

The YTF felt the idea of regional, national and international exchanges could be an effective tool in encouraging young people to step out of their comfort zone and gain new experiences. The YCP's emphasis on developing experiences outside their area and outside the country was an indication of youth interest. The YTF felt that sharing local experiences was key to breaking down barriers to opportunity whilst gaining knowledge of national and international comparisons on youth led community innovation would be valuable. This could have the dual benefit of helping young people to learn about and make contact with communities in the borough and to expand their horizons.

Several exchange projects have taken place in Lewisham, however these were mainly open to specific groups of young people who were already working with the Council in some capacity:

- Youth Connect Prague: Lewisham made a successful bid to the EU's Youth Connect Fund in partnership with the Local Authority of Prague 7 in the Czech Republic. The project funded an exchange visit from Lewisham to Prague to allow a comparison of the different styles of youth engagement in the two countries through the exchange of cultures, experience and good practice. Lewisham's Young Mayor and the Young Mayor's Advisors visited Prague during December 2006 to learn from their counterparts in the Prague 7 Youth Parliament. (Further information can be found on Lewisham Council's website).

- British Council in Bulgaria: In 2009, the British Council funded a trip for a group of young people to visit Lewisham during the Young Mayors election. The link was initially made following Lewisham's successful bid to the EU's [Youth Connect](#) fund. The bid focused on different models of engaging young people in local democracy, and with Bulgaria's imminent entry to the European Union, this is of particular interest. (Further information can be found on Lewisham Council's website).
- Leaving Care Team: This Lewisham based team have arranged an exchange programme for the last two years giving looked-after young people the opportunity to visit South Africa. The aim of the project, titled SELSA (South East London to South Africa), was to give disadvantaged young people the opportunity to broaden their horizons by experiencing a different culture and doing voluntary work. The trip was aimed at helping with their transition to adulthood and independence from care.

The YTF discussed the practical problems associated with developing youth exchange programs like these. Some members believed the cost, in relation to the benefits gained by the young people involved, would be minimal. Other members felt that the costs involved in developing an exchange programme would be substantial and unsustainable. Instead, it was suggested that events could be organised which celebrated the differences in Lewisham and encouraged an exploration of the diverse cultures within the city. It was also suggested that established events in the borough, such as Black History Month could be developed and expanded.

The Youth Task Force recommends:

- By building on established systems within the community, such as the Young Mayor, the Young Citizens Panel, local assemblies and area forums, the Council should explore how young people can increase their influence and actively participate in the decision-making process within those policy areas which directly affect their future prospects, health and well-being.
- The Council, youth-focused community stakeholders and young people should collaborate in the creation of a Young People's Charter for Lewisham. This charter should outline how young people understand their role as citizens of the borough, what the Council and its partners can do for them and what responsibilities they have towards the community.

- The Council, voluntary, faith and community groups should aim to strengthen the ambassadorial role of young people who contribute to their local community. Firstly, they should work with existing youth organisations and institutions, including the Young Mayor and the Young Citizens Panel, to enhance their presence and influence within the borough. Secondly, as young community activists and social entrepreneurs emerge, the Council's youth services and its partners should strive to reward and champion their achievements in order to create positive new role models. This could be accomplished either through existing awards ceremonies held by the council or new, specifically-designed events.
- Youth service providers within the community, including the voluntary and social enterprise sectors, work more closely with young people to capture their insights into the public sector and draw on these experiences to co-design services and improve delivery.
- The Council and youth service providers should explore options for creating a one-stop internet based communication portal to provide information about youth employment opportunities, volunteering and support services. This resource should be designed in collaboration with the Young Citizens Panel to ensure that it is relevant and attractive. The Young Mayor and other local publicity mechanisms should then be used to maximise awareness and increase uptake. In developing this resource, it is anticipated that council officers would engage with young people about how to build upon existing social networks and utilise new other media.
- The Council and its community partners recognise that whilst voluntary groups, the third-sector and social enterprises are essential to tackling the economic and social problems facing young people, schools are best placed to ensure real progression is made in these areas and should have responsibility for promoting opportunities that exist for employment, training and educational in the local community.
- The council develop an international exchange programme for young people through the Young Citizens Panel. Using the Council's international links gained from previous exchanges, project officers drawn from the panel would be responsible for approaching relevant youth councils, student unions or other citizen groups to secure an appropriate partner with whom to undertake the exchange. They would also need to secure funding both in the initial stages of the project and throughout the programme. Potential funders currently supporting youth exchange

projects include the British Council, European Voluntary Service and the Princes Trust. These organisations fund 70% of the cost of each child participating in the exchange leaving only 30% for the young people to contribute themselves. This remaining cost could be met via fundraising activities, which would be facilitated and supported by the project officers. Funding opportunities from these organisations take place every 3 months so this will need to be a continual process. It would also be necessary to secure funding for the feasibility visit to each country prior to the exchange taking place. This is a standard procedure when applying for funding for exchange programmes.

B) Volunteering – An Opportunity to Build Self Confidence and Skills

Volunteering and the Recession

There was considerable discussion in the task force about the importance of exploring the range of pathways into employment. It was recognised that there are opportunities for young people to secure employment and skills through volunteering. Members noted that given the economic downturn, recession and current fiscal retrenchment, volunteering offered practical opportunities for young people to obtain skills, training and experience, without necessarily entering the labour market.

Although the recession is officially over in the private sector, looming public sector cuts mean that a recession in this area of the economy is fast approaching. The figures presented earlier indicate that whilst growth in the economy has returned, albeit at a slow pace, youth unemployment is persistent throughout the UK, especially in more deprived areas such as Lewisham. Moreover, official and unofficial projections also predict that the public sector cuts have the potential to impact heavily on job growth in the private sector in the coming years.

These conditions have sharpened the rivalry for a limited number of vacancies, with nearly fourteen jobseekers for every available position in Lewisham. Even in the wider and more buoyant London economy, in which the majority of our residents work, the figure stands at eight applications for every role. Driven by an influx of college leavers into the labour market, Lewisham also saw an increase in unemployed 18-24 year olds between May and

August 2010. For school and college leavers looking to enter the labour market with little or no experience of the working world, the possibilities of finding employment can be severely limited, particularly in the current circumstances. With increased competition for employment and further education opportunities, individuals who miss out and potentially fall behind their peers not only suffer from educational disadvantage, but decreased levels of workplace familiarity. Volunteering can therefore offer young people the chance to broaden their knowledge outside of the classroom, apply their skills in a practical manner, and develop their CV.

Local Volunteering and Barriers to Participation

Given the benefits which volunteering can bring to both individuals and communities, the YTF decided to survey existing local and national initiatives.

The Council and its partners have been keen to encourage volunteering within the local community. Lewisham's Volunteering Strategy (launched in 2006) sought to raise awareness of the benefits of involvement, build capacity and infrastructure, develop good volunteering practice and create a civic environment within which it could flourish, thus ultimately increasing the rate of participation.¹⁹ The Council has also supported nationwide Vtalent programme. It aims to make volunteering opportunities diverse, compelling and a natural lifestyle choice for 16-25 year olds in England and full-time volunteering work across the Children and Young Peoples Directorate has been provided during the past year. Vtalent has also funded another local volunteering group called Youth Aid. This relatively small voluntary organisation provides an advice, information and development service for young people throughout the borough of Lewisham. In particular, it carries out an extensive programme of work through drop-in advice and counselling sessions for young people, group work and collaboration with a number of organisations to develop appropriate responses for young people in the fields of health, education, volunteering, employment, careers advice and educational support.²⁰

The Volunteering Strategy was devised and spearheaded by the Council's community partners, such as Voluntary Action Lewisham (VAL), who offered a range of expertise

¹⁹ Lewisham Volunteering Strategy 2006-12. www.lewisham.gov.uk/.../FullLewishamVolunteeringStrategy.pdf

²⁰ For information see http://www.youthaid.org.uk/about_us.html

upon which the task force could draw. For over forty years, this charity has supported and represented the work of voluntary and community organisations in the borough. It aims to develop the capacity of the voluntary and community sector in the borough, promoting community empowerment and engagement through effective cross-sector partnership. VAL's database includes over 800 voluntary and community organisations. In addition, over 500 people are involved in local tenants' and residents' associations and 1,000 people are involved in the Lewisham Citizens Panel. Volunteer Centre Lewisham (VCL) is another locally accredited volunteer centre which seeks to develop, promote and enable citizens to get involved in volunteering by offering advice, training and placements.

During a presentation to the YTF one of VCL's community partners, Lewisham Sport and Leisure Service (SLS) described the opportunities and barriers to volunteering in their sector. They informed the group that, in partnership with Sport England and VCL, the Council has successfully secured funding for a part-time sports volunteering development officer. This dedicated officer spends two days a week in Lewisham working closely with local sports clubs in order to develop club and volunteer capacity, including the training of existing coaches and volunteers. Future areas of development will involve securing external funding, which will be used to provide accredited sports training and opportunities for Lewisham residents aged 16 and over. Whilst they indicated that these were positive developments, several barriers preventing young people from fully utilising the opportunities provided remained in place.

These included;

- The image of the leisure & sports industry and volunteering more generally – i.e. long hours, not very 'glamorous' and unrewarding.
- Lack of awareness amongst young people of the range of opportunities in the sector – physiotherapy, coaching, leisure management, lifeguards, gym instructors, personal training, and club development
- Lack of effective communication to make young people aware of the volunteering and training opportunities available in the borough.

The YTF also suggested that volunteering could be used as method to engage young people in community activity. The voluntary sector and youth organisations were leading

the way by encouraging young people to interact with the wider community and they believed that this should be harnessed and promoted.

2012 Olympic Games

One of the largest sport related opportunities for volunteering will be the 2012 London Olympic Games. SLS also provided some details on the opportunities provided for volunteering during the up-coming Games. They suggested that the YTF should consider how the Council and its partners can maximise the benefits of the games for Lewisham, citing the London 2012 Plan for Lewisham and the need to secure a lasting legacy for volunteering and training in the sports industry.

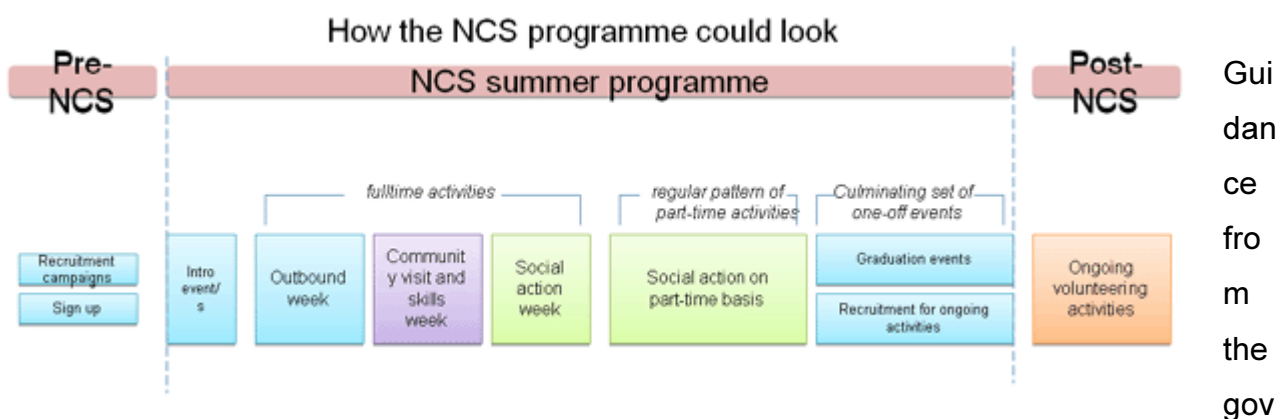
Lewisham Council has produced a two year Olympic and Paralympic action plan (2010-2012). The plan outlines Lewisham's proposals to bring the benefits of the 2012 games to citizens of the borough through the strengthening of international links; encouraging sport and physical activity; sustaining cultural and the arts; supporting business development; building capacity to deliver the games and by developing productive partnerships. During the Olympic year there are plans to run activities and sporting events across Lewisham. Lewisham Sports Fortnight will incorporate national school sport weeks and the London youth games. Lewisham People's Day will be used to showcase the borough's sporting talent and there will be opportunities for citizens of all ages to try new sports. It is envisaged that these events and the associated cultural Olympiad will provide a wealth of opportunities for young people to become involved in sports and healthy activities – and also to volunteer. Task force members suggested that local bodies, not traditionally associated with the voluntary sector such as Lewisham college should work with the Council and the Olympics delivery team to make young people aware of the opportunities and benefits of volunteering at the games and in associated activities throughout London.

The National Citizens Service

The YTF also wanted the Council to bear in mind national developments in the voluntary sector. On entering office, the Coalition Government expressed a strong commitment to encourage volunteering as part of a civil action drive to tackle the social, economic and political challenges that the UK faces over the coming years. The Prime Minister has

begun expanding on the 'Big Society' theme that encapsulates this new, and advanced role for the voluntary and third (renamed Civil Society) sectors. Community projects have been established in four parts of the UK - Liverpool; Eden Valley, Cumbria; Windsor and Maidenhead; as well as the London borough of Sutton. They allow communities to run post offices, libraries, transport services and shape housing projects with the use of volunteers.²¹ Funding for the takeovers could be facilitated through the Government's proposed 'Big Society Bank'. It will be designed to finance neighbourhood groups, charities, social enterprises and other non-governmental bodies.²² It is estimated that this bank will launch with reserves of around £60 million, funded through dormant bank and building society accounts in England.²³

Future developments from the 'Big Society' project include the introduction of National Citizen Service (NCS) – a flagship volunteering programme for 16 year olds to be piloted from summer 2011. The Government maintains it will offer young people the opportunity to develop the skills needed to be active and responsible citizens as well as the chance to mix with people from different backgrounds, and to become more involved in their communities. Mixing young people from different backgrounds is one of the core objectives of NCS, and the plan is for organisations to set out innovative approaches to achieving this. It is anticipated that this structured program will last for around 7-8 weeks. The diagram below shows how it will be structured:



ernment states that 'the initial three phases of activity should be consecutive and made up

²¹ BBC News, Monday 19th July 2010, <http://www.bbc.co.uk/news/uk-10680062>

²² The Cabinet Office. *The Coalition: our programme for government*, p. 29-30. http://www.cabinetoffice.gov.uk/media/409088/pfg_coalition.pdf

²³ The Guardian Online, Monday 19th July 2010, <http://www.guardian.co.uk/politics/2010/jul/19/david-ferman-big-society-cuts>

of three weeks of full time activities followed by a regular pattern of part-time participation over a further 4 week period. A minimum of ten days and nights should be spent on a residential basis away from participants' homes to give the participants the opportunity to develop life skills and resilience, such as managing a budget and cooking meals'.²⁴

Indications from the YTF sessions with the Young Citizens Panel are that young people would react well to a volunteering scheme which would expand horizons across London and beyond. It is thought that encouraging and facilitating volunteering will help minimise the effects of the recession on young people who are encouraged to participate. It has been claimed that the Council's efforts tend to be focused on people who are not in employment or education (NEETs), but there is a case to suggest that it is very hard for those in further and higher education to gain employment upon graduation and therefore be motivated to develop as citizens. Volunteering offers the option for motivated young people to gain experience of the working environments whilst becoming more involved in their the local community.

The Youth Task Force recommends:

- All possible avenues and techniques for emphasising the importance of volunteering are explored in order to foster positive attitudes towards the individual and community benefits. This should highlight its contribution to enhancing an individuals CV; its ability to build social and professional relations; the social networks it creates beyond a young person's familiar surroundings; and its potential role in improving the personal responsibility of young people and community cohesion.
- With London hosting the Olympic Games in 2012, the Council, schools, voluntary, faith and community groups should make it a priority that Lewisham's young people should be encouraged to become involved in the games and associated activities across the city, wherever possible.
- Public agencies investigate the possibility of creating more work experience schemes and internship placements which match skills to job progression in order to create sustainable outcomes for young people.

²⁴ See The Cabinet Office, http://www.cabinetoffice.gov.uk/newsroom/news_releases/2010/100802-grants.aspx

C) Apprenticeships – Creating Opportunities for Young People

Why Apprenticeships?

In all of the YTF meetings and associated activities, apprenticeships were raised continuously as a way of creating sustainable opportunities for young people. With the chief objective of the YTF being an investigation of how to improve employment opportunities for young people in Lewisham, apprenticeships were seen as equipping young people with the skills to survive recessions and their subsequent repercussions in the labour market. At a time of fiscal restraint, apprenticeships were seen as a good long-term investment. Over 80% of businesses believe that apprentices help raise the productivity of their organisation; due to this increase in productivity, the investment is normally recouped with two or three years of the apprentice completing their training and employers report lower staff turnover, a more innovative workforce, and are able to develop managers for the future. Due to their participation in apprenticeships, young people can expect a wage return of 8-18% compared to 14% for A-level students; 90% of apprentices find employment immediately after their training ends; and over 40% achieve an upgrade or promotion on the completion or shortly after their training concludes.²⁵

Council and Partner Organisations' Apprenticeships

The Council, has maintained a long-standing commitment to increasing the number of apprenticeships available to school leavers and those who are classified as NEETs. The Children and Young People's Plan 2009-12 made explicit pledges to enhance both the breadth of opportunities and number of apprenticeships in order to raise aspirations and close socio-economic gaps in the borough.²⁶ During the economic downturn in 2009, the Mayor created an additional 31 apprenticeships in areas such as youth work, community arts management, emergency planning, communications, human resources and finance. In June of this year the Mayor also announced fifteen new Council apprenticeships as part of the Mayor of Lewisham's action plan to support the local community. The Council has entered into partnership with other organisations in the borough to deliver training and jobs

²⁵ Confederation of British Industry. *You're Hired! More Apprenticeships for Business*.
<http://www.cbi.org.uk/pdf/20100713-cbi-youre-hired.pdf>

²⁶ *It's Everybody's Business. Lewisham Children and Young People's Plan 2009-12*, p. 13 and 56

for apprentices. During the last round of recruitment, the Council placed several apprentices in third sector organisations for two year placements. This novel and innovative scheme will be reviewed over time to ensure that it creates sustainable routes into employment.

The SLS informed the YTF of both existing and future apprenticeships offered in their sector. An apprenticeship in 'Active Leisure and Learning' contains paths that cover many aspects of the sector, including sport, fitness, playwork and outdoor activities. It also offers the opportunity to develop both practical and technical skills that allow developments at work and progression into further education. The apprenticeships run at different levels, but all lead to National Vocational Qualifications (NVQ), key skills and a range of technical certificates.

One of the areas the SLS were looking for ways to develop are the Young Apprenticeships (YA) in sports management, leadership and coaching. YA's provide an opportunity for 14-16 year olds to combine academic studies with a blend of vocational qualifications and work placements. During Years 10 and 11 (key stage four), YA's embark on a Level 2 vocational qualification in sport leisure (worth between 2-4 GCSEs at A-C*) alongside core curriculum subjects such as English, Maths and Science. Young Apprentices learn the practical skills and knowledge required by employees whilst studying for qualifications which specifically relate to the sector.

For SLS, the key to obtaining long-term success in apprenticeships was maintaining a constant support framework for those participating in their programmes. They also believed that their involvement in the Mayor's apprenticeship programme had been a productive experience and offered a good example of a spring board for future employment.

Two other local services providers that had been part of the Mayor's apprenticeship programme in 2009 – Phoenix Community Housing and Glendale – gave the task force further details about the apprenticeships they provided. The former are involved in the national apprenticeship training scheme and are working with UK-wide organisations to provide extensive training in order to develop staff and to progress them through the organisation. They are also working with the community organisation Groundwork. Glendale are similarly exploring different ways of working with young people.

Phoenix currently employ around 105 people, but only 5 apprentices. The task force asked these organisations why they hadn't taken on more apprentices and whether the terms of the contract stipulated that this was necessary. Glendale responded that there was no requirement for them to take on apprentices in their contract, but there had previously been a requirement to take one apprentice. They would be willing to take more apprentices on in the future, if this was written into their contract.

Council Procurement and Apprenticeships

The Procurement department at Lewisham Council was asked to give a presentation about the Council's procurement practices in order to answer questions regarding the potential addition of apprenticeship requirements to Council contracts.

The Procurement Team agreed it would be possible to implement such a requirement within future contracts if it was made Council policy. They stated that 'criteria involving social considerations may be used to determine the most economically advantageous tender where they provide an economic advantage for the contracting authority which is linked to the product or service which is the subject-matter of the contract.' In short, 'the Council could ask for apprenticeships in a security contract but not for the supply of paper'.

The previous Government has been keen to leverage the £220 billion spent on public sector procurement each year to implement its wider policies. At Lewisham Council, contracts are already being used to implement policy. For example, the Mayor agreed to give 'due consideration' to the implementation of the London Living Wage (LLW) in 2009 during the re-tender process for Council contracts. The first contract to be successfully re-tendered with the integration of the LLW was the Green Spaces Management and Maintenance Contract, which is worth £35 million over ten years. The cost of implementing the LLW for this contract during the first year is estimated to have been around £350,000.

The YTF was interested in a similar method being used by the Council to promote the use of apprenticeships by contractors. As public funds will be limited in the future, they suggested that the Council should use its position as the largest user of out-sourcing contracts to ask all contractors working with Lewisham to employ a number of young

people as apprenticeships depending on the size of the contract. In response, the Procurement Team informed the YTF that in order to implement such a policy the Council would have to alter the wording of its re-tendered contracts and determine what level of involvement it would have with apprentices who were based in contracted organisations. At present, the scheme is administered through the Council's Human Resources department. The YTF asked for early submissions from the Council's Procurement Team on the use of Council contracts to support employment opportunities for the borough's young people. The Council could use this capacity to support the embedding of apprentices into the services run by Council contractors.

The YTF asked for additional information about the impact of legal, financial and equalities issues on any proposals they might potentially put forward. Legally, the office of government commerce has outlined the framework for including apprenticeship roles in public contracts (see Appendix 3). This framework has been available for some time and central government has been notionally committed to hiring apprentices in public contracts for several years. Nonetheless, the uptake of apprenticeships by contractors has not been at the level expected by Government. The problems with employing apprentices at the Olympic construction site as well as on the development of Crossrail have highlighted some of the drawbacks with the current approach. These issues have been debated more widely in the available literature and it is suggested that the Council review the implementation of its apprenticeships policy in the financial year 2010/11.

Central government has historically funded part of the apprenticeship programme, either during the training element or through some other part of the process, but it is desirable that as much funding as possible should be drawn from this source in order to pay for the scheme. In 2009, the previous Government set a target for the provision of places for 20,000 apprentices over three years, with funding allocated for the support and development of the programme through the Department of Business, Innovation and Skills (DBIS). The current Government has expressed a strong desire to expand national apprenticeship opportunities. Whilst job creation schemes, such as the Future Jobs Fund have been cut, they have outlined £500m to support 'job training' and apprenticeships.²⁷ The cost of matching funding for apprentices in the third sector for a year should be

²⁷ Early commentary on the coalition budget: <http://www.guardian.co.uk/politics/2010/may/24/george-osborne-6-25bn-spending-cuts>

thoroughly explored by the Council. The rough estimates of costs are around £20,000 for each apprenticeship per year. It is envisaged that costs of apprenticeships in the private sector be borne by Council contractors and the relevant central funding bodies.

In terms of the equalities impact, the apprentices scheme has been dominated by young people (typically those who are 16-25) and Government funding has been focused on those in the lower age range. Lewisham does not specify an age range for apprentices²⁸ and it would be expected that this situation be maintained. The provision of employment opportunities for young people has been one of the Mayor's priorities and this policy may well positively benefit those who are 16-25. Nonetheless, it should not focus on young people to the detriment of older people who wish to follow the apprenticeship option.

The YTF stressed that there was a need to gather further evidence on how this the national policy framework would develop over the coming years. Once this process has been undertaken, the YTF believed that because the apprenticeships are so vital to the young people of Lewisham, a national framework for quality apprenticeships could be led by the Council and its community partners.

The Youth Task Force recommends:

- During the re-tender of Council contracts, due consideration be given to the provision of employment for apprentices as well as other opportunities including work experience, work shadowing, etc.
- Eligible contractors be asked to outline their capacity for the delivery of positions for apprentices and that this should be used as part of the tender evaluation process.
- The Council's current provision for providing apprentices should be used to support the deployment of apprentices into partner organisations.
- The Council consider 'matched funding' for the delivery of the apprentice programme in the third sector, whereby the Council funds one year of an apprenticeship on the provision that the other year is funded by the host organisation through their own funds or through the draw down of central government funding.

²⁸ Lewisham Apprenticeship scheme
<http://www.lewisham.gov.uk/JobsAndCareers/CouncilVacancies/Apprenticeships.htm>

- The management and development of apprentices should be included in the Council's overall management of its contracts.
- The Leisure Services contract be used as the first Council contract to specify the uptake of apprentices in its tender documents. The contract is in the process of being written and it is due to come into force in October 2011.

D) Social Enterprise and the Third Sector – Developing New Prospects

Social enterprises have become increasingly important as providers of local services over the last twenty to twenty five years. In Lewisham, there are 41 registered organisations with a social aim. The Mayor has stated his commitment to encouraging the development of social entrepreneurs and the role that social enterprises have in making Lewisham a stronger, more dynamic and prosperous place to live.²⁹ The Lewisham Social Enterprise Strategy (LSES) 2009-12, which was delivered in partnership with the Lewisham Social Enterprise Steering Group (composed of VAL, Social Enterprise London, South East Enterprise and representatives of local social enterprises) set out six strategic aims for the social enterprise sector in Lewisham;

- Raising the profile and demonstrating the value of the third sector.
- Developing entrepreneurial capacity of the third sector.
- Enabling access to a range of finance.
- Opening up procurement practices to enable access to new markets.
- Developing a recognised voice for social enterprise.
- Improving access to suitable premises.

In June this year, the YTF meeting was dedicated to investigating local social enterprises. Presentations were given by The Midi Music Company, Head for Business and Enterprise UK, plus submitted evidence by Make Believe Arts. The session had three main themes – breaking down barriers, developing business links and creating networks.

²⁹ Lewisham Council. Organisations with a Social Aim Directory 2008.
<http://www.lewisham.gov.uk/NR/rdonlyres/7153D5B8-C6AC-415C-BF5F-55B0CC83DD92/0/DirectoryOfOrganisationsWithASocialAim2008.pdf>

Breaking Down Barriers

As the YTF found out during their investigations into encouraging a youth led approach to volunteering, there appeared to be significant barriers facing young people who want to develop business ideas and contribute to the social enterprise sector. The Midi Music Company (MMC) works to break down the barriers facing young people who want to become involved in the music industry by training people to develop their musical talents and work alongside other young people on collaborative projects. In addition, the MMC uses teachers, mentors and role models to support its work and to develop the talents of its young creative clients.

The organisation has always promoted the uptake of tailored careers advice to young people as it believes that this helps those both receiving advice and their respective employers. One of the difficulties the organisation faces in its work with young people is the poor promotion of networks and other alternatives available to those who need it. Although there are many such networks and groups working with young people, they need to be better integrated. Indeed, there appears to be a lack of programmes which bring these groups together in order to share their connections across the industries.

Developing Business Links

The YTF was interested in finding out how young people could become involved in the setting up and running of businesses. Finding out why there were not more young people in Lewisham who are prepared to set up their own businesses was a matter the YTF wanted to explore further. Head for Business (HFB) was aware of this issue. They are concerned with engaging young people in enterprise in order to help young entrepreneurs work through the problems associated with starting traditional businesses. HFB supports people who want to start their own business – with a particular focus on the creative and cultural industries. Clients are referred to the organisation through networks as well as being recommended by word of mouth.

The YTF felt that young people needed to be well informed about the implications of their ideas. Some YTF discussions focused on the need for young people to learn responsibility. The implications of finance, such as debt and credit issues, should be taught

to young people who wished to develop sustainable business ideas. Moreover, the integral role of business plans was also mentioned as a key feature of the learning process which could help encourage local youths into social enterprise. It is vital for young people to get constructive advice about how businesses work in order to make informed decisions.

Creating Networks

The final area covered during the YTF's social enterprise and business session was that of young people possessing business links and the social capital to see their ideas come to fruition. Members of the YTF were interested to learn about the ideas generated by Enterprise UK in this area. It was pointed out during this organisation's presentation to the Task Force that it is likely the third sector's reliance on public funding will be a subsequent difficulty for social enterprises post-recession and through the period of fiscal retrenchment in the public finances. It was suggested that there need to be more small and medium sized industries to enable people to support themselves rather than relying on public sector funding. Moving forward, it was noted that funding for the set up of small businesses will need to be drawn from a more diverse range of sources. The idea was presented to the YTF that one of the main challenges of social enterprise is to set up a business with as little money as possible and to be inventive with the resources to hand. The point was made that there is no need for young people to get into debt to set up their own business, but they do need the right support and advice.

The biggest barrier for young people in this sector is the lack of information about how to realise their business ideas. It may be that one of the biggest opportunities is young people's familiarity with social networking sites and social media. Supporting young people to network with each other in order to develop their own approaches to shared problems may be much more successful than adults marketing to young people. MBA believes that engagement needs to be youth lead, with the knowledge that the support from young leaders need will be available when it is needed.

The Youth Task Force recommends:

- The social enterprise and third sector should work together to create a 'social enterprise mentoring academy'. This new service would provide advise and

guidance to young people that encourages them to develop aspirations to start-up their own community schemes and business enterprises in the future. One essential function of the mentoring academy would be to forge links between businesses, professionals and those in the creative industries, and to pass these onto young people struggling to make their first business and industry contacts.

- The Council and its community partners should explore methods of broadening the commissioning of public services to extend their capacity to make use of the creative and cultural sectors such as UK music, sports and leisure industries. The social enterprise sector should also be encouraging young people to explore potential growth areas in the coming years, such as elderly and personal care.
- As the focal point of the local community, the Council should facilitate the creation of a forum for the third-sector and social enterprises to share success stories and evidence of what works in the local community. This will allow these sectors to improve the services they provide to young people by forming a framework of best-practice, and help avoid duplication of services. Moreover, it should also explore how the role of the social enterprise sector can be extended and expanded.
- Given the massive investment from the Building Schools for the Future programme, schools should be encouraged by the Council to open their new facilities to the wider community to create opportunities for social enterprises and the third-sector to make use of them. Given the economic climate surrounding education funding, schools should also investigate the possibility of creating commercial relationships with these sectors to make it economically viable for them to offer the use of their amenities.

E) Wellbeing – Constructing Resilience

As indicated in the background research, the social costs of youth unemployment stretch well beyond material well-being. In order to further investigate how unemployment and scarce opportunities amongst young people can effect their health, well-being and security, the YTF held a dedicated session on the subject. Two presentations were given on health and well-being and community safety.

Health and Well-being

The first set of evidence was provided by the South London Maudsley NHS Foundation Trust (SLAM). They talked the YTF through the mental health services provided by the Children and Adolescent Mental Health Service (CAMHS) in Lewisham- which include:

- A wide range of mental health and substance misuse services.
- The largest child and adolescent mental health service in the country. At any point in time over 6,000 children and young people are in contact with their services, of which over 900 are in contact with their national and specialist service.
- The provision of a wide range of learning opportunities, including 14,000 training experiences a year.

Risk Factors

To understand the potential impact of youth unemployment on the well-being and health of Lewisham's young people, the YTF discussed the specific risk factors associated with poor mental health which may be present in parts of the borough. CAMHS indicated that the impact on young people in the community when risk factors overwhelm protective factors, and its resultant implications, is a complex issue for policy makers. Service providers need to consistently monitor young people who are on the edge of the community. The emotional effects on young people who underachieve can potentially last the whole of an individuals' life. It was noted that prevention is a vital tool in this field of work.

One particular risk that can result from being on the edge of the community as a result of underachievement or unemployment is exposure to overconsumption of alcohol (sometimes referred to as 'binge drinking'), illegal drugs, violence, eating disorders and mental health problems. The YTF discussed with CAMHS the number of young people being referred to them because of drugs. Although no specific figures were given, it was felt that there was not a particular rise in cases. However, there has been an increasing upward trend in young people using strong varieties of cannabis. This latter social problem has been linked to young people developing mental health problems in later life, and should therefore be regarded as a life cycle risk.

The issue of substance misuse was discussed at length. It was maintained by some members that serious social problems can become self permeating; with older group of young people tending 'act' out of their problems by abusing alcohol, and becoming involved in violence. Moreover, as socially excluded young people become older, bi-polar disorders, depression and anxiety also tend to manifest themselves. The YTF was informed that one in six – 1700 referrals a year – take place in Lewisham for metal health related problems. Attention-Deficit Hyperactivity Disorder (ADHD), depression and 'conduct disorders' were the most prevalent disorders being referred to CAMHS. It was pointed out by a YTF member that young people are often reluctant to admit that they have mental health problems. Situations such as exams are stressful and this causes depression. As expectations on our young people increase, there should be better advertising and access to mental health services.

Services

A YTF member asked about the age and range of services offered by CAMHS. Their service sees people up to the age of 18. After this age, young people are referred to adult mental health services at GPs' offices. The profile of cases changes on a regular basis. Younger children tend to have behavioural problems and the manifestation of the internalisation of problems. Also, especially among young girls, there is a problem with the internalisation of their worries which manifests in eating and communication problems. They indicated that there was a problem with working for a large trust – 'there's a big sign on the side of CAMHS buildings and for some people the Maudsley has negative connotations'.

YTF members wanted to know what established public sector agencies, such as schools, can do to combat the risks produced by social exclusion. A YTF member wanted to find out about CAMHS interactions with schools. At present, there are a small number of mental health staff working in schools. However, some young people want to be referred outside of the school setting due to issues such as social stigma. The YTF inquired whether educating young people about mental health was taking place in the classroom. The YTF heard that there was, at one time, a programme of engagement which trained teachers to support young people. It was maintained that this service would make a difference if it could be revived and delivered sustainably. However, there was a

recognition that teachers are being given a difficult task. High academic standards are expected but schools are also being required to look after young people's health and wellbeing. Schools could be seen as a central place for monitoring, engagement and the delivery of basic help for young people with high stress levels.

Safety

One question relating to the subject of health and well-being that was consistently referred to was the issue of threats to physical safety as barrier to young people fulfilling their potential. Similar to the risk posed by health related issues such as drug and alcohol abuse, involvement in crime can be direct product of youth unemployment and associated problems of social exclusion. Task Force member Barry Mizen, who has a personal insight into the issue of crime due to the tragic loss of his son to knife crime, gave a presentation to the YTF on his work in the local community. There were two prominent themes in Barry's presentation and in the subsequent question and answer session:

Neighbourhoods and Community

The work of the Jimmy Mizen Foundation (JMF) is centred around improving neighbourhood and local community safety of young people. Supporting the idea that the safest communities are 'self regulating' the JMF has spent the last couple of years campaigning on crime issues and community engagement in the borough. One part of this is the Jimmy Mizen awareness project which involves visiting schools and prisons. The foundation is also working with other community groups such as the South London Citizens to engage people in local areas.

One of its innovative programs is the work with Safe Havens which involves local shops becoming Safe Havens where young people can go to if they feel as though they are in danger. This was built on the belief that shop keepers are willing and able to build relationships with young people and communities in their local areas if the opportunity is created. The Jimmy Mizen Foundation has turned a shop into a coffee shop, community hub and centre for the foundation on Hither Green Lane.

The YTF was informed that the unique aspect to the Safe Havens project was that, unlike Safer Neighbourhood Teams, their work focused on getting young people to support themselves and to help them build capacity in their own areas. They felt it was about creating an alternative for young people and to give them an opportunity to be involved in positive activities. They suggested that unlike other community ideas such as safe houses, which they regarded as complex and open to abuse, the Safe Havens were 'a simple idea that works well'.

Police

Whilst community and neighbourhood interaction was seen as an innovative way of contributing towards ensuring young people's safety and well-being, ultimately meaningful youth engagement with the police is seen as critical. In the session with the YCP the YTF asked the young people whether Lewisham felt like a safe enough place for them to succeed, and if the police were felt to be a solution or part of the problem. They gave the following responses:

- They feel safe in some areas, but not in other parts.
- In their experience young males are stopped and searched on regular occasions.
- There is a lack of police presence at night, so they do not feel safe.
- Night time transport issues were highlighted, particularly the feeling of vulnerability felt when having to wait in town centres with no police presence.
- They felt there was a lack of positive relationships and trust between young people and the police.

The relationship with the police and young people was a point which was revisited during the health and well-being session. The breakdown in trust between young people and the police was a concern for the YTF. They felt that building trust in communities to support people was vital. One YTF member felt this tension between young people and the police could be traced to the intimidating behaviour by some police officers. Another felt difficulties stemmed from the difference in cultural understanding between the police and young people. This could be a reflection of the YCP point regarding the prevalence of stop and search. The lack of cohesion was also related by another member to there being no

incentive for the police to engage with the local community. There may be a role for PCSOs, but this will take some time to develop. They indicated that this is what made Safe Havens an attractive method of youth engagement; the shopkeepers involved were rooted in the community and did not move – enabling people in communities to build relationships.

The YTF also felt that there was a growing concern about the escalation in youth violence and the perceptions of youth crime, potentially related to this decline in trust. Indeed, the JMF felt that the level and escalation of violence was a problem as young people were not able to deal with the exacerbation of violence and some were not deterred by harsh punishments. According to the JMF, it was necessary for young people to see the wider consequences of their actions on the local community. It was suggested by another YTF member that young police officers should be put in positions where they can engage with young people in their communities, learning the skills they need to connect with young people in the borough.

The Youth Task Force recommends:

- The Council create a specific support system for young people facing stress, depression, isolation and pressure at school. It is vitally important that our young people are equipped to deal with stress, anxiety and depression. Access to information about mental health should be readily available at schools and (where feasible) teachers should receive specialist training from the borough's mental health experts on how to help young people deal with well being and mental health issues.
- The Council and its community partners work more closely with schools to ensure young people are given information and advice on issues which concern them. For instance, an information programme could be designed and led by young people as they are best positioned to relate to other young people about issues affecting their generation. This work could be developed alongside third sector partners and the local NHS.
- Creating more opportunities for inter-borough and regional initiatives that encourage young people to travel and feel safe without fear of crime or attack. This should

include the Council continuing to support and development the London Citizen's Safe Haven's project.

Appendix and Sources

1.

Pete Walsh (Chair) – Consultant LBL on BSF and former Head of Forest Hill School

Les Back – Professor of Sociology, Goldsmiths College

Mike Bidulph – New Projects Development Manager, XLP

Wozzy Brewster OBE – Director, The Midi Music Company and Mayor's Advisor

Rev. Barry Carter - Brockley United Reformed Church and St Andrews Youth Club in Brockley and St Michael's youth Club

George Davies - Chair of Lewisham Borough Football Club

Manny Hawks – Co-ordinator, Young Citizens Panel

Dennis Hunter – Consultant and former head of Lewisham's Youth Service

Nathan John – Chief Executive Youth Enlightenment Limited and Mayor's Advisor

Simon Marchant – Director of Projects and Operations, XLP

Barry Mizen – Founder, The Jimmy Mizen Foundation

Margret Mizen – Founder, The Jimmy Mizen Foundation

Kalbir Shukra - Goldsmiths College Youth and Community Work MA, Goldsmiths

Denis Wade - Director/Pastor Micah Ministries

Phil Turner – Development Officer, Second Wave

Liam Webber - Co-ordinator, Young Citizens Panel

2.

OGC apprentices contract wording

http://www.ogc.gov.uk/documents/ppn_14_09_guidance_on_embedding_skills_and_apprenticeships_in_public_procurement.pdf

The Contractor is required to take all reasonable steps to employ apprentices, and report to the Authority the numbers of apprentices employed and wider Skills training provided, during the delivery of this contract.

The Contractor shall take all reasonable steps to ensure [Insert % up to 5% or 1 in 20] of the employees, or that a similar specified proportion of hours worked in delivering the contract, (which may include support staff and sub contractors) are to be delivered by an employee on a formal apprenticeship programme.

The Contractor is required to make available to its employees working on the contract, information about the Government's Apprenticeship programme and wider skills opportunities.

The Contractor shall provide any appropriate further skills training opportunities for employees delivering the contract.

The Contractor shall provide a written report detailing the following measures in the regular contract management reporting [monthly, quarterly] [delete as appropriate] and be prepared to discuss apprenticeships at contract management meeting:

- a) The number of people during the reporting period employed on the contract, including support staff and subcontractors;
- b) The number of apprentices and number of new starts on apprenticeships directly initiated through the procurement process;
- c) The percentage of all employees taking part in an apprenticeship programme;
- d) If applicable, an explanation from the contractor as to why they are not managing to meet the specified percentage target;
- e) Actions being taken to improve the take up of apprenticeships;
- f) Other training/skills development being undertaken by employees in relation to this contract, including:

Work experience placements for 14 to 16 year olds

Work experience /work trial placements for other ages.

Student sandwich/gap year placements

Graduate placements

Vocational Training

Basic skills training

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MAYOR AND CABINET			
Report Title	Young Mayor of Lewisham – Budget Proposals for 2009/10		
Key Decision	No	Item No.	5
Ward	All		
Contributors	Executive Director for Resources		
Class	Part 1	Date: January 19 2011	

1. Summary

On 13 October 2010, Kieza Silveira de Sousa was elected as the seventh Young Mayor of Lewisham. The new Young Mayor, alongside existing and new young advisors, has begun to plan areas of work and processes of consultation and involvement for the 2010/11 Young Mayor's budget.

Bringing the work of the previous Young Mayor and advisers to a close, this report recommends the proposals suggested by Jacob Sakil (Young Mayor for 2009/10). These proposals are intended to provide improvements in services for children and young people in the borough. The Young Mayor for 2009/10 has had a budget of £30,000 to be allocated after consultation with young people. This report summarises the proposals recommended from the 2009/10 budget.

2. Recommendation

That the Mayor considers the Young Mayor's budget proposals of £30,000 for 2009/10.

3. Policy Context

3.1 The voice of the child has long been recognised as an essential component in the shaping of youth policy as well as in the life choices that face individual children and young people. This was first enshrined in the U.N. Rights of the Child (1991) and reflected in children and young people's social policy.

3.2 The Young Mayor's initiative is a key corporate priority for the Council in meeting its commitment to enhance young people's achievement and involvement. This priority is further emphasised by the Council's commitment to engaging with young people as part of its community engagement strategy to strengthen engagement with local communities.

- 3.3 The Young Mayor Programme contributes to the priorities in Lewisham's Sustainable Community Strategy 2008 - 2020. Specifically the priority Empowered and responsible- where people are actively involved in their local area and contribute to supportive communities.

The young mayors budget addresses further priorities notably Ambitious and achieving – to Inspire our young people to achieve their full potential by removing the barriers to learning and Encourage and facilitate access to education, training and employment opportunities for all our citizens.

- 3.4 The Young Mayor of Lewisham is central to the Council's Children and Young People's Participation Strategy, which has developed a framework in which to enhance and evaluate youth participation. For 2009/10 the allocation received by the Young Mayor increased to £30,000 highlighting the commitment to the programme. The Young Mayor makes proposals on expenditure to the Mayor following consultation with young people in Lewisham during their one year term of office.
- 3.5 In April 2006, this innovative initiative was nationally recognised when the London Borough of Lewisham was awarded Beacon Status for 2006 – 2007 for its 'Positive Youth Engagement' (In the Community and Democratic Process by the Office of the Deputy Prime Minister & the Improvement & Development Agency).
- 3.6 In June 2007, Wilf Petherbridge, former Young Mayor of Lewisham, and the Young Advisors chaired the Youth Cabinet, at Downing Street with the Prime Minister and other Cabinet Ministers as part of the launch of 'Aiming Higher'. This was a result of their contribution to the reviews and consultation that informed the Aiming Higher 10 year Strategy.
- 3.7 In 2010 the Young Mayor Programme contributed to the Local Government Group paper "valuing young voices, strengthening democracy: the contribution made by youth engagement". And a case study for the IDEA on youth participation.

4. Background

- 4.1 Lewisham's first directly elected Young Mayor, Manny Hawks, took office in April 2004. The election took place across Lewisham's secondary schools and sixth form colleges, and all pupils were eligible to stand as candidates and to vote. Lewisham residents attending secondary schools and colleges outside the borough were also encouraged to vote through local youth centres or on-line. Forty

candidates, under the age of 18 years were nominated to stand in the election and the turnout was 44.6% representing 7653 votes cast.

- 4.2 Lewisham's second directly elected Young Mayor, Wilf Petherbridge, was elected in October 2005, using a similar democratic process that includes postal votes, and direct mailing to home educated pupils. There were thirty three candidates aged 14 -17 years, and the election turnout was increased to 46.9% representing 8110 votes cast.
- 4.3 Lewisham's third directly elected Young Mayor, Siobhan Bell, was elected in October 2006 in the same way, and was the first Young Woman to be Elected as Young Mayor in the UK.
- 4.4 Lewisham's fourth elected young mayor was Justin Cole, who attended Crofton School in Lewisham. Justin's proposals included "Block parties" and indicated a shift towards the Young Mayor and Advisors working with the wider community as well as around young people's issues.
- 4.5 Lewisham's fifth elected young mayor was Miguel Gutierrez Astudillo. Miguel attended Addey and Stanhope School in New Cross and had a turn out of 49.6%.
- 4.6 Lewisham's sixth elected Young Mayor was Jacob Sakil, who attended Sedgehill School and now attends Haberdasher Askes Sixth Form college. The turn out increased to 52.5% which represents 9616 young people voting.

5. Activities during 2009/10

- 5.1 In 2009/10, the Young Mayor and Young Advisors have continued to represent their peers at local, regional, national and international events, becoming involved in policy development and reviews.
- 5.2 The Young Mayor and the Young Advisers continue to build relationships and work across the local authority and partners, advising on different policy areas.
- 5.3 *Examples of the range of activities and events that young advisors have participated in developing/ supporting, or contributing too through conferences and consultations locally.*
 - Young Citizens Panel monthly meetings and consultations
 - Safer Lewisham Partnership: Stop and search strategy,
 - Lewisham Community Police Consultative Group, Youth Advising Police group, YOS, Trident
 - Termly School Council Meeting
 - Supporting schools PSHE/ Citizenship curriculum, cultural and peer led

- Positive Aging Board Intergenerational project
- Block Parties – working with others in the community
- Young Planners – young people contributing to the regeneration of the borough.
- Policy and partnerships -Our Lewisham Our Say; developing consultation for young people on the boroughs efficiencies.
- People's Day
- Young People's Talent Show and Auditions
- RAR under 18s Band Nights
- YOF/YCF, publicising positive activities, peer inspections.
- Positive Activities for Young People Commissioning
- Organise and participate in Annual Youth Conference
- Community Football Tournaments and alternative Sports Day.
- Local Assemblies – supporting young people's participation
- Lewisham Link – encouraging Young peoples voice on health and social care issues
- LGBT anti bullying Event
- SE London Chamber of Commerce – building links with local business.
- Lewisham Education Business Partnership
- Voluntary Action Lewisham CYP Forum
- Civic Engagements which the Young Mayor and Advisors attend include the Looked after Children Awards, Pride Awards, LBL Sports Award, Holocaust Memorial Event, LBL Schools Award, LBL Anti bullying conference , LBL Travellers conference, Transition Day – Contact a family, Lewisham Business Awards, Make a Difference Award.

5.4 *Examples of the range of activities and events that young advisors have participated in developing/ supporting, or contributing too through conferences and consultations regionally.*

- Good Practice sharing with LB Sutton, Merton, Greenwich, Tower Hamlets, Newham.
- Young Mayor Network – sharing good practice, research and meeting with the Met Deputy Commissioner
- Greater London Authority: Parliamentary Outreach Programme
- Operation Black Vote – encouraging young peoples participation

5.5 *Examples of the range of activities and events that young advisors have participated in, or contributed to, through conferences and consultations nationally.*

- UKYP including debate at the House of Commons
- UK Youth Hearing unheard Voices – campaigning group
- British Council European Conference at the House of Commons
- British Youth Council Deficit consultation
- RSPCA – research on dangerous dogs

- 5.6 *Examples of the range of activities and events that young advisors have participated in developing/ supporting, or contributing too through conferences and consultations Internationally.*
- Poland visit – sharing good practice with young people and local authorities about participating in local democracy.
 - Sharing good practice internationally with South Africa (meeting the SA President) Sweden, Japan, Saudi Arabia, Russia
- 5.7 Over the last year, the Young Mayor and advisers have also worked extremely effectively with colleagues and services across the Council. Increasingly, this collaborative working has extended to other local agencies within the wider partnership structure. In order to both sustain the proposals of the previous Young Mayor, and to develop their own, these networks and relationships are providing crucial.

6. The Young Mayors Proposals 09/10

- 6.1 The proposals outlined below build upon some of the issues and interests that Miguel Gutierrez Astudillo (Young Mayor for 2009/10) budget addressed. These included supporting and offering additional opportunities for young people to show existing talents and try new activities, which they otherwise might not have the opportunity to experience. And continue to develop how young people and others in the community work together to better understand each other and to increase community cohesion and safety.
- 6.2 Over the past year Jacob Sakil has worked closely with both his Young Advisors, the Young Citizens' Panel and more regularly with school councils on how to best spend his budget. As well as consulting more widely through a newsletter, online survey and discussions with local groups in the voluntary and community sector.

The main aim of the 2009/10 budget is to provide opportunities for young people to increase their skills and raise their aspirations through:

- a. **Role model and mentoring programme.**
- b. **Raising the profile of young people in Lewisham by collecting and publicising positive stories.**
- c. **Developing opportunities to perform and learn skills in the arts.**
- d. **Sports tournaments which offer the chance to be scouted for further opportunities.**
- e. **Block parties/ community events and Intergenerational work.**

Some of these themes for Jacob's budget will be developing and building on the work of his predecessors. In particular sports, arts and

community events, to continue some of the recurring areas of interest for young people in Lewisham, with the aim of making them sustainable.

6.3 Proposal 1 – Role model and mentoring programme

Role model seminars to meet achievers from the local community, local business and further afield. Young people able to find out about career paths they may not have thought about .

Young people will be recruited through schools and the voluntary youth and community sector .

Young people then able to participate in an e-mentoring scheme to have the support to develop skills, confidence and knowledge to make decisions about their futures..

6.4 Proposal 2 – Positive Stories

Researching, publishing, publicising and celebrating the achievements of young people in Lewisham. Researching individual and group achievements by young people in schools, youth clubs, church groups, scout groups who have achieved through different ways; academically, supporting the community, developing activities for peers and/or others.

6.5 Proposal 3 - Performing and learning new skills

Lewisham has a thriving young arts scene and it is important that talented young people are given the opportunity to perform and display their work. The proposal, therefore, is for a performing showcase event in early 2010 which will provide an opportunity for young musicians, artists and poets to perform and promote their work. This will also bring together young people from across the borough through universal mediums. Young People will also have the chance to learn skills in backstage and front of house management.

There will also be opportunities for young people to perform at Lewisham People's Day in July 2011 – a continuation of previous Young Mayor Wilf Petherbridge's idea.

6.6 Proposal 4 – Sports Tournaments

Community football and sports events involving young people from across the borough. Young people come together to meet new people with the opportunity for being scouted for a club, therefore raising their aspiration and extending their opportunities to reach their potential.

6.7 Proposal 5 - Block Parties/ community events/ intergenerational work

Working with colleagues, partners and members of the community to organise and participate in community days bringing together young people/older people others with a range of activities, food and opportunities to build community understanding and cohesion. Based in different neighbourhoods

7. Summary of proposed Expenditure

7.1 Role model and mentoring programme

Planning, Coordination and delivery	£5500.00
Staffing support	£2500.00
Promotion	£1000.00
Events/ venue	£1000.00

7.2 Positive Stories

Research hours	£3500.00
Promotion	£1500.00
Celebration Event	£1500.00
Equipment	£1000.00

7.3 Performing and learning new skills

Marketing, training and support	£5,000.00
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7.4 Sports tournaments

Venue	£1500.00
Coordination	£1000.00
Promotion	£500.00

7.5 Block Parties /community events and intergenerational work

Community/ Block Parties	£2500
Intergenerational project	£1500

Total £30,000.00

8. Consultation

8.1 The Young Mayor has remained committed to his election manifesto in identifying ways in which to promote opportunities for young people to have their voices heard, acknowledging and addressing issues of safety for young people and supporting local community initiatives.

8.2 The proposals were discussed at meetings of the Young Advisers who fully support the recommendations. The Young Advisers will help to plan, design and manage the planned events, where they have the capacity to do so. Colleagues, partners and young people from other organisations will also be asked to contribute to planning and organising the proposals.

8.3 The young mayor and advisors will report back to the Young Citizen's Panel, School Councils, Mayor and cabinet and the Annual Youth Conference.

8.4 Ongoing consultation of these proposals will take place with young people in through the Youth Service, School Councils, voluntary Sector and People's Day, and Young People's Conference.

9 Financial Implications

9.1 The net costs of the proposed programme is £30k and will be met from the budget for the Young Mayor's programme.

10 Legal Implications

10.1 Section 2 of the Local Government Act 2000 empowers the local authority to do anything which it considers likely to achieve the promotion or improvement of the economic, social or environmental well-being of all or any persons within the local authority's area. It enables the Council to incur expenditure under these wellbeing powers which could include a budget for the Young Mayor. The sum of £30,000 is a reasonable for the purposes outlined in the Report.

11. Crime and Disorder Implications

11.1 The Young Mayor's proposals relate to the development of activities, resources and information that will provide young people with diversionary activities, contribute to community initiatives and provide opportunities for young people to address issues concerned with their safety.

12. Equality Implications

12.1 The Young Mayor and Young Advisors have considered the equalities implications in all of the proposals and will ensure an inclusive approach to all activities undertaken.

13. Environmental Implications

13.1 There are no environmental implications arising from this report.

14. Background papers

For further information on this report contact Malcolm Ball, Young Mayor's adviser on 0208 3146354

Agenda Item 6

MAYOR & CABINET		
Report Title	Local Development Framework – Lewisham Town Centre Area Action Plan Further Options Report	
Key Decision	Yes	Item No. 6
Ward	All	
Contributors	Head of Planning & Head of Law	
Class	Part 1	Date: 19 January 2011

1. Summary

- 1.1 The Lewisham Town Centre Area Action Plan (AAP) is one of the documents that, when adopted, will make up the Council's Local Development Framework (LDF). The LDF refers to the group of documents setting out the Council's planning strategy and policies. The LDF documents will eventually replace the Unitary Development Plan (UDP) which was adopted in July 2004 and sets out our current planning policies. The LDF preparation is a requirement under the Planning and Compulsory Purchase Act 2004.
- 1.2 The purpose of the AAP is to identify and deliver the vision and strategic objectives identified for the town centre (taking account of those in the Council's Core Strategy) by managing development and guiding interventions by the private, public and third sectors.

2. Purpose

- 2.1 This report seeks approval to undertake statutory public consultation on the:
 - AAP Further Options Report (included as Annex 1) and
 - Sustainability Appraisal of the AAP Further Options Report (included as Annex 2).
- 2.2 This report provides a summary of how the AAP has been prepared, the key options contained in the document and the key issues identified in the Sustainability Appraisal. The full documents are annexed as 1 and 2.

3. Policy context

- 3.1 The contents of this report are consistent with the Council's policy framework. The AAP Further Options Report contributes to the implementation of each of the Council's ten priorities as follows:

- community leadership and empowerment
- young people's achievement and involvement
- clean, green and liveable
- safety, security and a visible presence
- strengthening the local economy
- decent homes for all
- protection of children
- caring for adults and older people
- active, healthy citizens
- inspiring efficiency, effectiveness and equity

3.2 The AAP Further Options Report will help give spatial expression to the Sustainable Community Strategy (Shaping Our Future) (SCS), which was prepared by the Local Strategic Partnership and adopted by the Council in May 2008. The AAP also plays a central role in the implementation of the SCS vision *'Together we will make Lewisham the best place to live, work and learn'* and all of the six strategic priorities, which are:

- Ambitious and achieving – where people are inspired and supported to fulfil their potential
- Safer – where people feel safe and live free from crime, antisocial behaviour and abuse
- Empowered and responsible – where people are actively involved in their local area and contribute to supportive communities
- Clean, green and liveable – where people live in high quality housing and can care for their environment
- Healthy, active and enjoyable – where people can actively participate in maintaining and improving their health and well-being
- Dynamic and prosperous – where people are part of vibrant communities and town centres, well connected to London and beyond

3.3 The AAP will help implement a range of other Council policies and strategies including, but not limited to the following:

- People Prosperity Place; Lewisham's Regeneration Strategy 2008 - 2020
- Children and Young People's Plan
- Local Implementation Plan (Transport)
- Lewisham Physical Activity Plan (2010-2013)

3.4 The AAP will also contribute to the achievement of the strategic aims of the Regeneration directorate which are:

- Enabling and supporting the regeneration of Lewisham and helping to strengthen the local economy
- Supporting the creation of a safe, attractive, healthy and sustainable environment for the benefit of local people and
- Connecting people to economic, leisure and learning opportunities

3.5 The AAP is part of the LDF and as such it is part of the Council's policy framework as set out in the Council's constitution and will require the approval of the full Council.

4. Recommendation

4.1 The Mayor is recommended to approve the Lewisham Town Centre AAP Further Options Report and the accompanying Sustainability Appraisal, for statutory public consultation in accordance with the Statement of Community Involvement, and recommend that the full Council do the same.

4.2 The Mayor is recommended to delegate power to make any minor changes to the text and format of the documents prior to consideration by the full Council, to the Executive Director, Regeneration.

5. Introduction and background

5.1 The Lewisham Town Centre AAP, when adopted, will be part of Lewisham's Local Development Framework (LDF). The LDF refers to the group of documents setting out the Council's planning strategy and policies and will collectively replace the Unitary Development Plan (UDP). The LDF was introduced by the Planning and Compulsory Purchase Act 2004.

5.2 The emerging AAP has already been the subject of two rounds of public consultation.

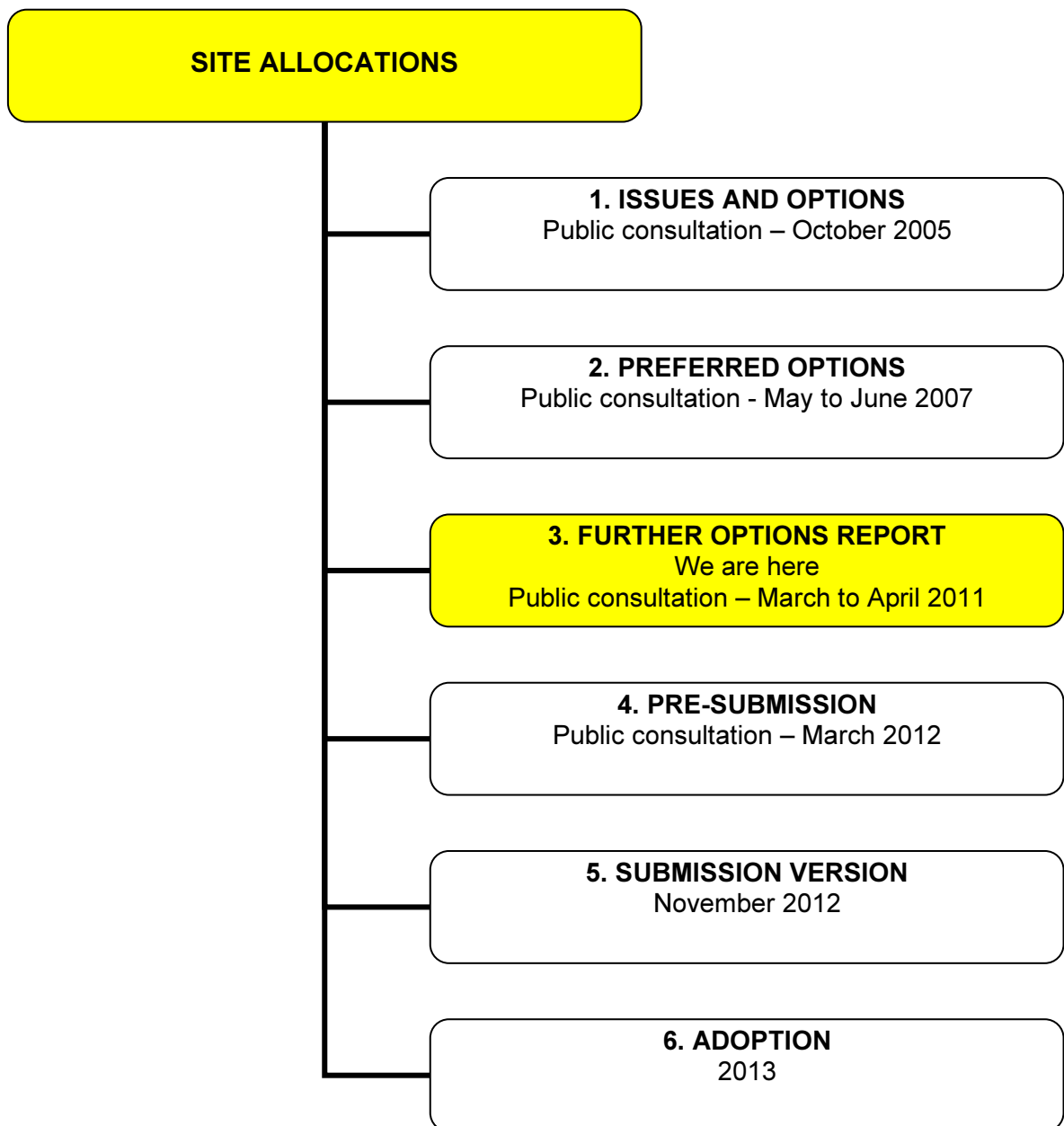
- Issues and Options (October 2005) and
- Preferred Options (May to June 2007).

5.3 Following advice from the Government Office for London (GOL), priority was given to the production of the Core Strategy (the principal LDF document) hence there has been some delay in progressing the AAP. The Government also released further guidance on the appropriate content and level of detail expected within LDF documents, necessitating a review of our approach to the preparation of such documents.

5.4 Lewisham Core Strategy was submitted for examination by the Secretary of State at the end of October and work on the AAP has subsequently resumed. Given that over three years have elapsed since the last public consultation it is considered necessary to take stock of changes and present further options for consultation.

5.5 The AAP Further Options Report has been prepared so as to be consistent with national planning policies and to be in general conformity with the Core Strategy and the London Plan.

5.6 The steps in preparing the AAP are outlined in the following diagram. We are at stage 3.



6. Context

- 6.1 There has been a significant change in circumstances since the preferred Options Report was prepared in 2007. The key changes are outlined below.
- 6.2 Responses from the Preferred Options Report Consultation. Comments received in response to public consultation on the Preferred Options Report (May to June 2007) have been reviewed and have influenced the development of an amended vision and objectives and identification of further issues, options and policy options
- 6.3 LDF Evidence Base. The LDF evidence base has been significantly updated and expanded since 2007. The documents used to support preparation of the AAP Further Options Report includes but is not limited to:
- Strategic Housing Land Availability Assessment (SHLAA)
 - Lewisham Town Centre Transport Study
 - Employment Land Study
 - Retail Capacity Study (plus addendum)
 - Strategic Flood Risk Assessment and Sequential Test
 - Assessment of Open Space, Sport and Recreation
 - Infrastructure Delivery Plan
 - Tall Buildings Study
 - Renewable Energy Study
 - Lewisham borough-wide Character Study
 - Planning Obligations Study
- 6.4 Engagement with Developers and Landowners. Officers have had discussions with a number of landowners and prospective developers, including Tesco, Network Rail, Land Securities and LBL Property in order to understand their current intentions and make sure that a future AAP is deliverable.
- 6.5 Legislation, Policy and Guidance. There have been a number of significant changes in legislation, policy, guidance and economic climate that have been taken into account in preparing the Further Options Report. These include:
- Planning Act 2008 and Community Infrastructure Levy Regulations 2010;
 - New national planning guidance in the form of Planning Policy Statements 5 (Economic), 5 (Heritage), 12 (LDF) and 25 (Flood Risk). In addition, Lewisham Bridge Primary School has been added to the statutory list of buildings;
 - The London Plan (consolidated with alterations since 2004) was re-published in 2008 and the Mayor of London has published a Draft Replacement London Plan (October 2009);
 - An updated Sustainable Community Strategy for Lewisham (2008);
 - Submission version of Lewisham's Core Strategy (October 2010), including the identification of Lewisham Gateway as one of five 'strategic sites'; and

- The “credit crunch”, economic recession and public sector spending review.

6.6 Development Activity. There have been a number of significant changes since 2007, including:

- The granting of a number of planning permissions in the Thurston Road area for housing and retail/business space;
- The development of 73-78 Connington Road for housing (near completion);
- The development of the adjacent Venson site on Connington Road for housing (on-site);
- The development of Loampit Vale South for housing, retail and business space a replacement City Mission and leisure centre to replace the existing Ladywell Leisure Centre (on-site);
- The granting of permission for the development of an all-through school on the site of Lewisham Bridge Primary School; and
- The development of a new supermarket and housing above at 104-120 Lee High Road (on-site).

6.7 Sustainability Appraisal. An initial appraisal has been undertaken in parallel with preparing the Further Options Report and this is discussed in some detail in section 10 below.

7. Purpose of Further Options Report

7.1 The AAP Further Options Report aims to provide a bridge between the 2007 Preferred Options Report and a draft AAP by taking account of the significant changes detailed in the previous section. It establishes options that relate to issues and provides alternative approaches before selecting the Council’s ‘preferred approach. Additionally, the report enables the re-engagement of local residents, businesses and other stakeholders over the future of the area.

7.2 Following public consultation on the AAP Further Options Report, the Council will produce a draft AAP that will:

- Set out a vision for the Town Centre that is consistent with Spatial Policy 2 in the Core Strategy;
- Provide a focused implementation and delivery plan for achieving this vision and for monitoring progress;
- Effectively manage growth in retail, leisure, employment uses and new homes;
- Ensure that physical, social and green infrastructure provision keeps pace with the envisaged change; and
- Provide clear policies and guidance for land owners and prospective developers, so that they bring forward high quality development.

8. Scope of Further Options Report

8.1 The scope of the Further Options Report can be summarised as follows:

8.2 Amended vision and objectives. The Report updates the vision that was identified in 2007 by taking and developing the vision for the town centre that is included in the Core Strategy. The nine objectives that sit under the vision have been re-written to reflect the vision and the change in context (outlined in Section 6).

8.3 Identification of revised and additional options. The options for delivering the vision and objectives have been reviewed, with new options being identified and existing options being revised to take account of the following:

- Advances in the understanding of flood risk and climate change adaptation, including the London Plan and Core Strategy policy requirement to maximise opportunities for decentralised energy – with the identification of four possible decentralised energy clusters.
- The planned closure of Ladywell Leisure Centre, following the opening of the replacement centre currently being built at Loampit Vale, which opens up options for the development of the Ladywell site
- Current issues relating to the provision of social infrastructure, taking account of education and health developments that have happened or are planned since 2007 ; and
- The implementation and monitoring mechanisms that have developed since 2007, including the Infrastructure Delivery Plan, Planning Obligations SPD and Local Implementation Plan.
- Representations from landowners over the previously proposed option of developing a multi-storey car park in the Engate Street area; with the Further Options Report favouring a more pragmatic and deliverable option of retaining and improving existing public car parks and securing public use of any new non-residential car parking that is proposed as part of new development.

8.4 Area-wide Policies. The Further Options Report identifies a smaller number of proposed town-centre-wide spatial planning policies than was previously proposed. This is not to say that those policy areas that are proposed for exclusion are no longer important. The reason is to take account of government guidance and not to duplicate policies across Development Plan Documents and the London Plan. The approach should result in a more focused AAP that includes only policies that relate directly to the town centre, with general applicable policies remaining in other ‘sister’ documents and the London Plan.

8.5 New Sub-areas and Site-specific Policies. It is still proposed to divide the town centre into sub-areas for policy purposes. However, the boundaries of these sub-areas have been amended and they are now called ‘Character Areas’ to avoid possible confusion with London Plan ‘opportunity areas’. A new

Ladywell Road Character Area has been included in order to respond to the development possibilities offered by the planned closure of Ladywell Leisure Centre and other sites. The previously proposed site-specific policies have been reviewed to take account of the change in context (outlined in Section 6) and new draft policies have been proposed.

- 8.6 Implementation and Monitoring Arrangements. The Further Options Report sets out revised implementation and monitoring proposals, again taking account of the change in context (outlined in Section 6).
- 8.7 Audit of Issues, Options and Policies. Finally, the Report includes an audit (Appendix 3 of the Further Options Report) of how issues, options, preferred options and draft policies have changed since 2007, to assist in understanding the complexities of the process.

9. Sustainability Appraisal

- 9.1 A Sustainability Appraisal (SA) for the Site Allocations Further Options Report is included as Annex 2. The main purpose of the SA is to appraise the social, environmental and economic effects of the plan's strategies and policies. The SA also incorporates the statutory Strategic Environmental Assessment (SEA) and Appropriate Assessment requirements.
- 9.2 Each stage of the plan making process is accompanied by a sustainability appraisal, so that any potential negative impacts of policy decisions are taken into account at the decision making stage, and decisions can be seen to have been made in accordance with the principles of sustainable development.
- 9.3 The potential direct, indirect and cumulative impacts of the AAP Further Options Report has been appraised and identified. The SA details that "the AAP is likely to result in a number of social, economic and environmental benefits". In particular, the proposals to provide housing and retail growth will contribute positively to the economic sustainability objectives, while public realm improvements will support both social, environmental and economic objectives.
- 9.4 The town is affected by medium and high levels of flood risk creating some conflict with the wide scale of planned development. However, the proposals will provide significant regenerative benefits and help fulfil Lewisham's wider economic and social objectives. The Sequential Test has found that there are no alternate sites for this scale and type of development, while exception testing and mitigation measures will ensure that all sites are acceptable in terms of flood risk.
- 9.5 Another potential conflict identified was the policies seeking to retain/increase the amount of parking for shoppers in the town centre. This conflicts with the

sustainability objectives to encourage sustainable modes of transport. However, easy access to parking is a key advantage to Lewisham town centre which differentiates its offer with other nearby competing retail centres, therefore it is considered essential to **retain** parking where possible.

- 9.6 Two of the key developments proposed in the AAP involve the loss of Metropolitan Open Land (MOL). However the quality and function of this MOL is limited, and the loss of the land is mitigated through the re-provision of open space. The loss of MOL at these sites has been considered and appraised in detail as a separate process to this work.
- 9.7 It is a legal requirement that the council consult on the Sustainability Appraisal alongside the AAP Further Options Report. In accordance with the SEA Directive, the government has designated that the Sustainability Appraisal report must be consulted with the Environment Agency; the Countryside Agency; and English Nature.

10. Legal Implications

- 10.1 The key stages and requirements in progressing the emerging AAP to adoption and the main legal implications are described in the body of this report.
- 10.2 The procedures which the Council is required to follow when producing a Development Plan Document (DPD) derive from the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and Planning Policy Statement 12.
- 10.3 The function of approving DPDs is shared by Mayor and Cabinet and Full Council. The AAP Further Options Report together with the Sustainability Appraisal of the AAP Further Options Report must therefore be referred to Full Council for approval to undertake statutory public consultation.
- 10.4 The Council has adopted its Statement of Community Involvement (SCI) which sets out the minimum consultation that will take place and it is a requirement of a 'sound' plan that the standards in the SCI are met. This will include statutory consultees, land owners, community groups and other interested individuals and groups.

11. Crime and disorder implications

- 11.1 The AAP Further Options Report proposes specific objectives and policies to help ensure that new development does not give rise to crime, fear of crime or public disorder and to ensure that the town centre is a safe, attractive and

inclusive place. Planning applications for development will need to demonstrate how proposals meet these objectives and policies.

12. Equalities implications

- 12.1 The Core Strategy, to which the AAP DPD must conform, was the subject of a comprehensive Equalities Impact Assessment (EIA) in February 2009. This can ensure, as far as is possible, any negative consequences for a particular group or sector within the community are eliminated, minimised or counter balanced by other measures. This is considered to meet and address the strategic equality issues. The AAP Further Options Report proposes specific objectives and policies to help ensure that new development complies with inclusive design principles to ensure that the town centre is a safe, attractive and inclusive place. Planning applications for development will need to demonstrate how proposals meet these objectives and policies.

13. Environmental implications

- 13.1 Environmental issues are at the heart of the planning process and all aspects are reflected in the emerging AAP DPD. The AAP Further Options Report proposes specific objectives and policies to promote environmental sustainability, protect and improve publicly accessible open space, protect and enhance the Rivers Quaggy and Ravensbourne and ensure that the town centre can mitigate and adapt to the risks arising from climate change. The Sustainability Appraisal process also ensures that an explicit identification of the environmental impact of the proposed site allocations has been considered.
- 13.2 The specific environmental implications of the emerging AAP are in accordance with national and regional policy and have been evidenced through local studies assessing (but not limited to) open space provision, biodiversity, flood risk, and transport assessments.

14. Financial Implications

- 14.1 The costs associated with the printing, publishing and consulting on the AAP Further Options Report and the Sustainability Appraisal will be met from the existing Planning Services budget.

15. Conclusion

- 15.1 The AAP Further Options Report and the Sustainability Appraisal is put forward for statutory public consultation. The delivery of the AAP will contribute to the implementation of the Lewisham Core Strategy. Following public consultation a Pre-Submission Version will be prepared and reported to the Mayor and Cabinet and Council for further consideration.

Background Documents

Short Title Document	Date	File Location	File Reference	Contact Officer	Exempt
Planning & Compulsory Purchases Act 2004	2004	Laurence House	Planning Policy	Brian Regan	No
PPS 12	2008	Laurence House	Planning Policy	Brian Regan	No
LDF Regulations	2004 & 2008	Laurence House	Planning Policy	Brian Regan	No

If you have any queries on this report, please contact Brian Regan, Planning Policy, 5th floor Laurence House, 1 Catford Road, Catford SE6 4RU – telephone 020 8314 8774.

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Lewisham Town Centre Area Action Plan

Further Options Report

January 2011

Copy for Mayor and Cabinet



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1. INTRODUCTION

1.1 Background and process

1.1.1 What is the Lewisham AAP?

Lewisham's emerging Core Strategy Development Plan Document (DPD) sets out a spatial strategy for the whole of the Borough. Spatial Policy 2 identifies Lewisham Town centre as 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 2,500 additional homes.

The Lewisham Town Centre Area Action Plan (AAP) will be one of four further proposed DPDs that will set out new local planning policies, supplemented by guidance in the form of Supplementary Planning Documents. These documents will supersede the UDP, including 'saved' policies and allocations specific to Lewisham Town Centre in the UDP and adopted guidance, including the Lewisham Gateway Planning Brief (adopted as Supplementary Planning Guidance in 2002).

The Mayor of London's Spatial Development Strategy (the London Plan), with which all DPDs need to be in 'general conformity', sets out London-wide policies, supported by Supplementary Planning Guidance.

The AAP, together with other adopted DPDs and the published London Plan, will form the 'development plan'. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 makes clear that determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

The proposed policy framework is summarised below. Whilst the Core Strategy sets out a strategy for the next 15 years up to 2026, the AAP will focus on the shorter timescale of 5-10 years (the 'plan period').

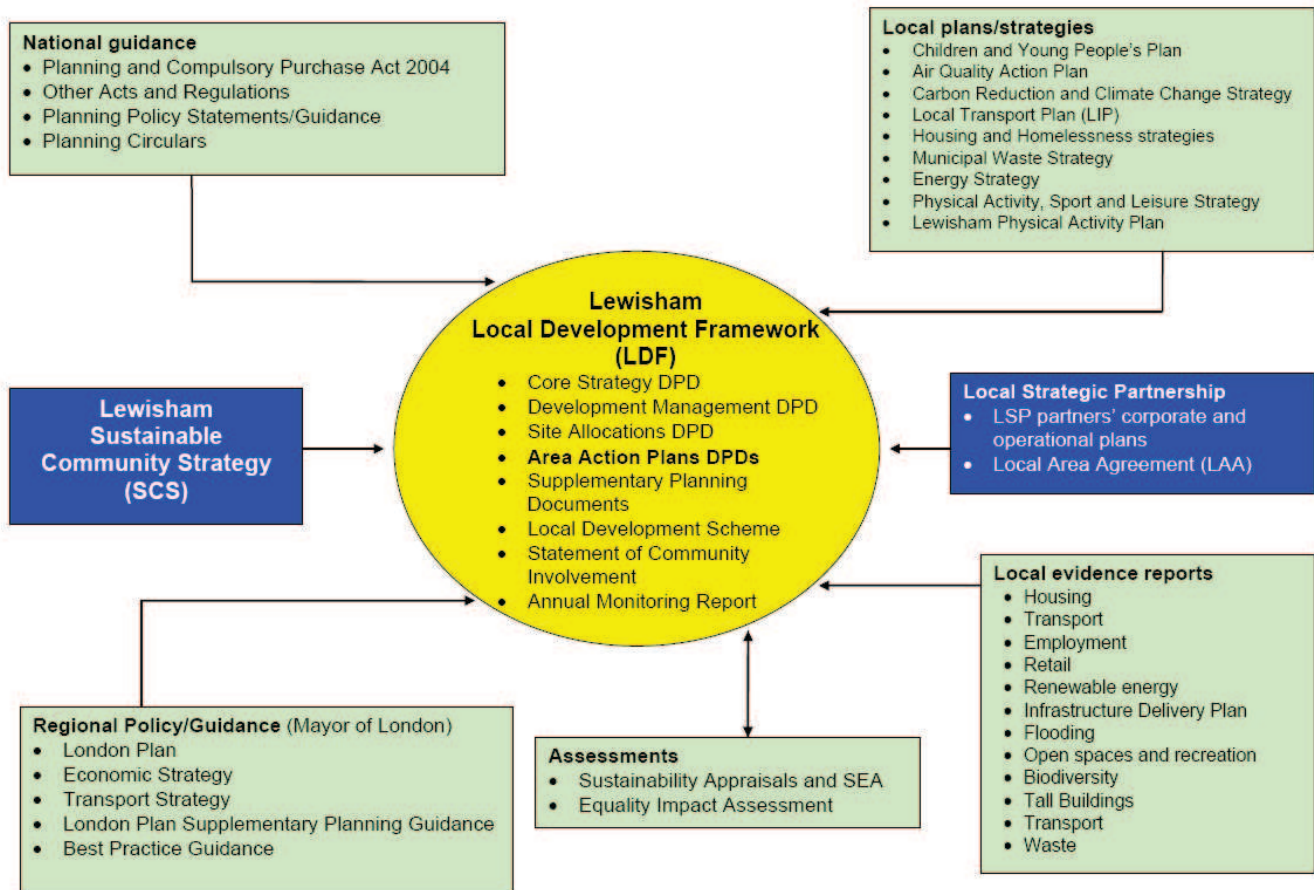


Figure 1: The position of the AAP within the policy framework

1.1.2 What is the purpose of this document and the AAP?

The overall purpose of the AAP is to deliver the vision and strategic objectives identified for the town centre by managing development and guiding interventions by the private, public and third sectors. The following diagram summarises the process of preparing the AAP.

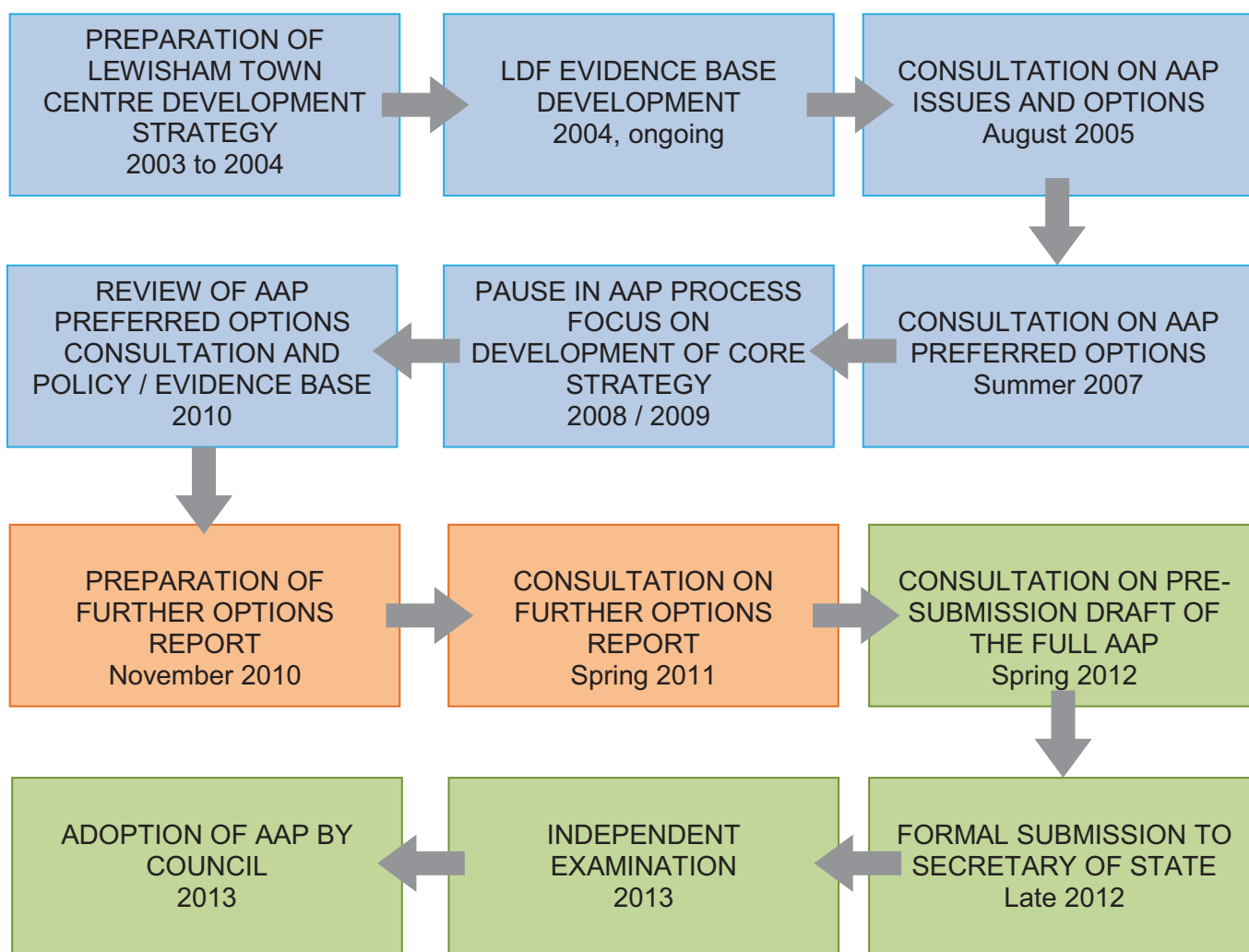


Figure 2: Where we are in the process

This document bridges the gap between the Preferred Options Report which was subject to public consultation in 2007, and the pre-submission draft of the full AAP which is targeted for publication in spring 2012. The following table summarises the scope and purpose of the Further Options Report and the final AAP.

Further Options Report	The AAP
To re-engage with local residents, businesses and other stakeholders over the future of the area	To set out a vision for the Town Centre that is consistent with Spatial Policy 2 in the Core Strategy.
To take account of comments received in response to the Preferred Options consultation	To provide a focused implementation and delivery plan for achieving this vision and for monitoring progress.

<p>To respond to changes in circumstances (legislation, policy, guidance, development activity, recession etc.)</p> <p>To provide a bridge between the Preferred Options Report and an AAP</p>	<p>To effectively manage growth in retail, leisure, employment uses and new homes,</p> <p>To ensure that physical, social and green infrastructure provision keeps pace with the envisaged change.</p> <p>To provide clear policies and guidance for land owners and prospective developers, so that they bring forward high quality development.</p>
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Figure 3: Scope of Further Options Report in comparison to AAP

The preparation of the AAP is being informed by an iterative process of Sustainability Appraisal to assess the emerging proposals from a sustainability perspective. This process is established in the Sustainability Scoping Report which was updated in October 2010 to ensure that the sustainability framework is based on an accurate understanding of key issues and policy objectives. The process is also being informed by an Equalities Impact Assessment, which considers the likely effect proposed policies would have on different groups in the community.

1.2 From Preferred Options to AAP

1.2.1 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.

A full schedule of consultation responses and associated resulting actions can be found in Appendix 2.

1.2.2 Principal policy changes

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

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.

National planning policy guidance and designations:

Planning Policy Statement 4 (PPS4) - Sets out the Government's comprehensive policy framework for planning for sustainable economic development. This replaced PPG4, PPG5 and PPS6.

Planning Policy Statement 5 (PPS5) – PPS5 and associated guidance sets out new advice on how the historic environment and heritage assets should be protected and enhanced for the current and future generations. This replaced PPG15 and PPG16.

Planning Policy Statement 12 (PPS12) – PPS12 was updated in 2008 and sets out the Government's policy on the preparation of LDFs.

Planning Policy Statement 25 (PPS25) – PPS25 sets out Government policy on development and flood risk and identifies the need for a proactive approach to the management and mitigation against the risk of flooding and adoption of a robust approach to avoiding inappropriate development in high risk areas. The advice was revised in 2010.

Lewisham Bridge Primary School has been added to the statutory list of buildings (Grade II) that are of architectural and/or historic interest.

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.

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).

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.

1.2.3 Character areas and key sites

The Preferred Options report (2007) identified a number of key opportunity sites within Lewisham Town Centre. Some of these sites have since progressed to implementation, some remain key development opportunities whilst some new sites have emerged as tangible development opportunities. The individual sites (sometimes themselves a collection of sites in different ownership) fall within a number of character areas as follows:

Gateway Character Area

This character area is dominated by the northern roundabout, roads and open and cleared spaces that make up the Lewisham Gateway site. This site is identified in the Council's emerging Core Strategy as one of five strategic sites across the Borough under Spatial Policy 2 and Strategic Site Allocation 6.

Loampit Vale Character Area

- **Loampit Vale South** – comprising the new Lewisham Leisure Centre and related mixed use development (under construction) and the proposed Prendergast Vale College through school. The Site Allocations Further Options Report (October 2010) recommends that the Lewisham Bridge Primary School site be safeguarded for the proposed through school.
- **Loampit Vale North** – comprising the land bound by the two converging railway lines to the north, west and east and Loampit Vale to the south. Planning permission has been granted for the redevelopment of the Thurston Industrial Estate. The area also includes the MFI and Allied

Carpets sites, the land identified for a bus layover as part of the Lewisham Gateway proposal and other buildings.

Conington Road Character Area

- **Tesco site** – comprising the existing store, its petrol filling station and its associated surface car parks.
- **Venson site** – to the north of the Tesco store and benefitting from planning permission for redevelopment for new housing and some commercial development.

The Silk Mills Path site to the north-west of Tesco has been developed for new housing with some ground floor commercial space and will therefore no longer be identified as an opportunity site within this character area.

Lee High Road Character Area

- **Former Hartwell Ford site** – planning permission has been granted for mixed use development on this site comprising a new retail store on the ground floor together with flats above. This scheme is currently under construction.
- **Other Lee High Road sites** – a series of other smaller sites nearer the town centre have planning permissions and are being promoted by a number of investors.

Ladywell Road Character Area

- **Ladywell Leisure Centre site** – this site will become available in 2013 following the opening of the new Lewisham Leisure Centre on Loampit Vale. The site presents a major new development opportunity not explicitly identified in the Preferred Options report (2007). A number of development options are being considered as the AAP is prepared.
- **Ladywell Road** – a collection of sites on the south side of Ladywell Road present a major opportunity to combine new infill development and investment with the refurbishment of listed buildings and other heritage assets.

Central Character Area

- **Lewisham Shopping Centre and adjacent land** – unlikely to come forward for comprehensive redevelopment in the foreseeable future but opportunities exist for retail led mixed use development at the northern and southern ends of the centre.

There are a number of places within the core of the town centre which may present opportunities for redevelopment and/or environmental enhancements. These include the existing Lewisham Library, the town centre's key surface car parks and the street market and surrounding public space.

1.2.4 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 property market and public sector spending regime.

1.2.5 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, and Housing Capacity Study October 2009.

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.

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 for 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.

1.2.6 Town centre focus

The Preferred Options report (2007) identified a detailed range of draft policies which reflected the comprehensive coverage the issues, options and preferred options identified by the AAP process.

Following revised Government guidance and more detailed work on other Local Development Documents, including the Core Strategy, there has been an acknowledgement that the AAP should be more focused on addressing specific town centre issues. As such, the Further Options Report has a reduced number of draft policies to ensure that the AAP has an appropriate scope and focuses 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 or will be adequately addressed in other parts of the 'development plan'.

1.2.7 Scope of document

Taking account of comments received in relation to the Preferred Options Report and the changes in circumstances that are set out above, the remainder of this document sets out the proposed changes in approach to preparing the AAP. In doing so it:

- a. Proposes an amended vision and amended objectives
- b. Identifies revised and additional issues and options taking account of:
 - Advances in the understanding of flood risk and climate change adaptation including the policy requirement to maximise decentralised energy
 - The future of Ladywell Leisure Centre
 - The provision of social infrastructure
 - Implementation and monitoring
- c. Sets out a new, smaller number of town centre-wide spatial policies
- d. Identifies amended sub-areas (now called Character Areas), with Engate Street longer being identified as a sub-area and Ladywell Road being identified as a new sub-area.
- e. Proposes revised policies for each of the sub-areas
- f. Proposes new implementation and monitoring arrangements
- g. A detailed review of how identified issues and options and proposed objectives and policies have changed since the April 2007 Preferred Options stage is set out in Appendix 3.

1.3 How can you comment?

The Council would like you to get involved with the production of the Lewisham Town Centre AAP by telling us what you think about the options and preferred options contained in this Further Options consultation report. All comments received, alongside feedback that has already been given on the earlier versions, will be considered in the development of a draft AAP.

Key questions we are asking are:

1. Are there any additional issues needing consideration by the AAP?
2. Do you have any comments on the recommended or alternative options put forward?
3. Do you support the recommended options for inclusion in the AAP?
4. Are there any other alternative feasible policy options?
5. Do you think that details included are incorrect or need updating?
6. Do you have any other comments on this document?
7. Do you have any comments on the accompanying Sustainability Appraisal?

How do I get involved?

Web

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

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

OR

E-mail

planning@lewisham.gov.uk

with 'LDF AAP Further Options Report' as the subject.

OR

Post

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

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

Please send comments by: 5pm on (To be confirmed).

It may not be possible to take account of comments that are received after this date.

2. THE STRATEGY

2.1 Geographical context

The London Borough of Lewisham covers around 13.4 square miles, located in south east London. It is a vibrant and ethnically diverse borough, home to more than 260,000 people.

The borough is made up of a collection of diverse neighbourhoods and strong communities ensuring that while the borough and its localities develop, they maintain their unique identities and preserve Lewisham's rich natural and architectural heritage. Adjoined by four other London boroughs, Lewisham occupies a key position on important transport routes (radial and orbital) within London and between central London, Kent and Sussex.

Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area stretching east to the Kent and Essex coasts along the Thames Estuary. Lewisham, Catford, New Cross and Deptford are identified as opportunity areas in the London Plan and are expected to be able to accommodate substantial new jobs and or homes.

Lewisham Town Centre is especially well connected to central London by rail and the DLR and benefits from high PTAL of 6b and 6a. It has developed as an important dynamic and strategic retail and service hub and is designated as a Major Centre within the London Plan. Lewisham offers a variety of appeal including the historic street market, comparison goods retail in the Riverdale Shopping Centre and independent specialist retail along the Lee High Road. Employment in the town centre is largely split between Distribution, Hotels and Restaurants (largely retail) providing 30% of total jobs, Banking, Finance and Insurance providing 27% and Public Sector (administration, education and health) accounting for 26%.

The Indices of Multiple Deprivation show that the area covering Lewisham town centre is among the 20% most deprived areas within England. While educational and health factors demonstrate a mid-table ranking, the indices relating to crime, environment and those affecting children and old people remain in the bottom quintile.

The borough is the 15th most ethnically diverse local authority in England where 130 different languages are spoken. This diversity is apparent in the town centre with the proportion of the overall population from a black and/or minority ethnic

origin at 47%.

The town centre has 3 primary schools within and close to its boundary including Lewisham Bridge Primary School, which is currently being transformed into the Prendergast vale all-through school, and a total of 23 primary schools in the two Primary Places Planning Localities (PPPLs) that cover the town centre. There are also 2 secondary schools nearby which have benefitted from the Building Schools for the Future (BSF) Programme to rebuild or refurbish every secondary school in the borough within the next decade. Health facilities are provided by 6 GP's and 4 dentists close by and the Lewisham University Hospital located immediately south of the centre providing acute services and a children's centre. In supporting the area Lewisham has a number of community and leisure facilities, while there are also many independent faith group facilities.

The borough has a wide portfolio of parks and green spaces, whilst within the town centre open space is provided through a mix of green and hard landscaping. Additionally, there is a Site of Importance to Nature Conservation and a number of green corridors that permeate the outskirts of the centre. The River Ravensbourne and the River Quaggy flow north and west respectively through the town centre surrounds converging adjacent to the railway station and continuing north towards the River Thames. The paths of both rivers are affected at points by culverts and channeling, while other sections accompany open space (including the Waterlink Way). In September 2010 the Council completed a final draft of the River Ravensbourne Corridor Improvement Plan which seeks to support opportunities to enhance the river and provide specific and general design guidance. Large parts of the town centre are at some risk of flooding from these sources although importantly most of the area is protected by flood defences, including the Thames Barrier.

A number of key historical assets exist in Lewisham, including listed and locally listed buildings (some of which are considered to be at risk) and local landmarks as well as the historic street market. The centre also falls within a wider Area of Archaeological Priority.

2.2 Key issues

2.2.1 Economy

Retail growth: Lewisham Town Centre has a relatively poor level of retail growth. In the context of 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. There is also a major opportunity to enhance the quality of the street market which is constrained by issues associated with refuse which has a negative impact on the overall street environment in Lewisham High Street.

Employment and training: It is important that the AAP ensures a good range of job opportunities and supports business enterprise. Sufficient employment land will need to be protected and new sites identified for mixed use development - including employment generating floorspace - to improve the overall economy of the town centre and the borough. Employment prospects should be enhanced by supporting and improving local training opportunities.

Evening economy offer: Lewisham Town Centre currently lacks a strong evening economy offer. Opportunities to nurture the range and quality of bars and restaurants should be grasped with a view to enhancing the vitality of the town centre beyond peak shopping hours, whilst strengthening the centre as an inclusive family friendly place.

2.2.2 Environment

Protection and enhancement of biodiversity and habitats: 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.

Flood risk: The Rivers Quaggy and Ravensbourne run through the heart of the AAP area increasing the risk of flooding as outlined in the Strategic Flood Risk Assessment. Climate change is predicted to increase adverse weather patterns, leading to more intense and severe flooding in flood risk areas and as such there is a need to reduce flooding and manage risk.

CO2 Emissions and Climate Change Adaptation: 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 and the provision of on-site renewable energy technologies. Sustainable design and construction will also be needed to reduce the heat island effect and provide landscaping, public realm and buildings that are better suited to the changing climate.

Traffic congestion and car dependence: 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.

High levels of air pollution due to traffic: 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.

Aging building stock and poor levels of insulation: The existing building stock will require updating with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings.

Carbon Dioxide emissions reductions: Lewisham's Energy policy requires a reduction in a buildings overall Carbon Dioxide (CO₂) emissions by maximising efficiency gains through each stage of the Mayor of London's energy hierarchy.

Recycling and waste production: There is a need to reduce waste generation and improve the existing low level of recycling and composting rates.

Inclusive Design: There is the continuing need to ensure that new inclusive design principles inform the design of new buildings, public realm areas and facilities to ensure that the town centre is accessible to everyone.

2.2.3 Social

Housing demand and population growth: The population is forecasted to rise. The Core Strategy sets a target of 1,500 additional new homes by 2016 and a further 1,100 additional new homes 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.

Decent and accessible homes: The percentage of homes that do not meet decent homes standards is falling, however there is still a need to improve this. There is also the continuing need to ensure that new residential development provides homes that 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.

Improved access to health care, education and community facilities: Ensure that improved and accessible health, education and community facilities are provided to accommodate existing needs and those arising from new developments. There are a number of unauthorised churches in the town centre that exhibit a demand for such accommodation.

Low levels of educational attainment: There is a need to improve the educational attainment of students in primary and secondary schools as previous years. Although improving, Lewisham is ranked in the worst third of Local Authorities for National Indicator 75 (Achievement of 5 or more A*-C grades at GCSE or equivalent English and Maths).

Addressing deprivation, social exclusion and health inequalities: The Indices of Multiple Deprivation show that the area covering Lewisham town centre is among the 20% most deprived areas within England. While educational and health factors demonstrate a mid-table ranking, the indices relating to crime, environment and those affecting children and old people remain in the bottom quintile. In Lewisham Central residents have 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.

General perception of high crime rates in Lewisham: 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.

Provision of open space and recreational facilities: Additional housing will result in a lower proportion of open space per 1000 population. Opportunities to provide additional open spaces from potential developments must be maximised and the role of the public realm enhanced to provide amenity space, better walking and cycling environments and play and recreation opportunities. Previous community consultation suggests that access to open and green space is a key issue for local residents.

Noise: Road traffic and road works noise are the most problematic types of noise for Lewisham residents. Lewisham town centre hosts key busy radial and orbital roads.

Road safety: 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.

Protect and enhance local heritage assets: 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, St. Stephen's, Belmont, Mercia Grove and St. Mary's. The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals.

2.3 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 called Shaping our Future:

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

The Core Strategy takes forward the SCS vision by setting out a detailed spatial vision for the whole Borough. In terms of Lewisham Town Centre, it sets out the following:

“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.

The vision is proposed for amendment by adding the following:

“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.”

2.4 Objectives

Objective 1 - Retail and town centre status: To support and improve the vitality and viability of Lewisham town centre by enhancing distinctive features such as the street market and achieving Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space and improved leisure floorspace

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 accessibility.

Objective 3: Sustainable Design: To apply consistently high standards of sustainable urban design and construction to individual sites to ensure that developments make the best use of natural resources, 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 retaining/re-providing employment generating uses, the redevelopment of key sites throughout the centre for a range of non-residential uses, including offices and the enhancement of training opportunities.

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 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 place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of educational, 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.

2.5 Summary of proposals

The following plan summarises the key AAP proposals as detailed in chapters 3 and 4.

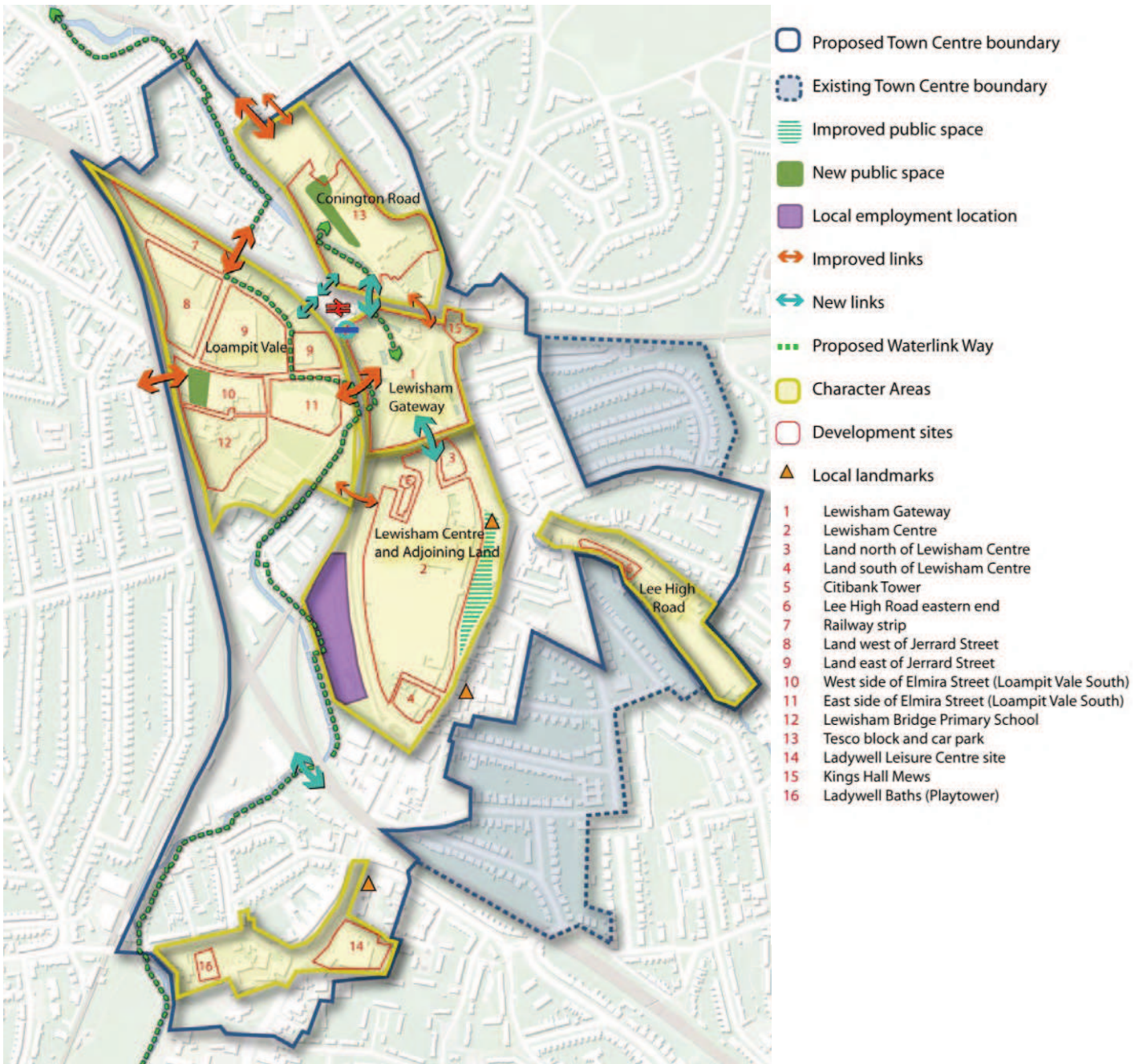


Figure 4: Summary of AAP proposals

3. AREA-WIDE SPATIAL POLICIES

3.1 Scope of the area-wide spatial policies

The purpose of this chapter is to review the process of options identification and preferred options selection. 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.

It is important to note that 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 following headings make a distinction between the following:

- A** - Preferred policy options which are retained from the preferred options 2007 report or retained with minor amendment;
- B** - New policies based on new issues, options and preferred options; and
- C** - Policies included in the preferred options 2007 report which have been deleted from this version.

Appendix 3 provides a detailed summary and rationale for the retention, amendment or deletion of draft policies.

It is important to note that the omission of a previously proposed policy does not mean that the issue it relates to is considered to be unimportant. In the majority of cases, the removal of draft policies is because it repeats a general borough-wide policy principle which is established elsewhere in the LDF.

A. Retained or amended policies

3.1.1 Overview

A number of policy topics in the Preferred Options Report have been retained without change or subject to relatively minor amendment or refinement. Each of the following policy topics is structured as follows:

- Statement of the preferred option articulated as a draft policy statement;
- Reasons for selection of preferred option; and
- Justification of policy retention / amendments.

Each of the retained policies should be read in conjunction with the Preferred Options Report (2007). The Preferred Options Report provides a detailed narrative that tracks the development and justification of each preferred option in relation to issues, options and consultation.

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out from section 3.1.1 to section 3.1.9. In particular, we would ask you to regard the following matters:

- Are there any additional area-wide issues needing consideration in the AAP?
- Do you have any comments on the new options, preferred options or proposed policies put forward?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

3.1.2 Housing (Issue LTC1)

Preferred option

The preferred option was a composite of all three options relating to issue LTC1 (the borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?). Option LTC1B proposed a policy which encouraged the redevelopment or conversion of existing sites with residential uses as part of a mix which formed the basis of draft policy LTC HSG3.

LTC HSG3 – CONVERSION OF EXISTING BUILDINGS [Retained without amendment]

The Council will encourage the conversion of existing buildings such as vacant offices or premises above shops for residential purposes provided that:

- a) A satisfactory living environment can be provided;
- b) There is no conflict with existing land uses; and
- c) The proposal complies with policy LTC EMP1.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** All options received support through the issues and options consultation process with no single option identified as a favoured approach.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS1, PPS3 and PPS4) and the London Plan (policy 3A.2 and 3A.5).
- **Wider policies:** The preferred option conforms to objectives in the Sustainable Community Strategy.
- **Other planning reasons:** Housing has a major role to play in supporting the commercial vitality and viability and environmental quality of the town centre.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Although the principle of conversion is established elsewhere within the national and regional planning framework, there is a need to provide specific policy for Lewisham town centre to clarify the circumstances in which conversion is acceptable and appropriate. Policies 2.15 and 3.3 of the draft replacement London Plan (2009) continue to support the delivery of housing through brownfield development including town centre locations.

No specific feedback was received on draft policy LTC HSG3 during the Preferred Options consultation and as such it has been retained without amendment.

3.1.3 Shopping and town centres (Issue LTC6, LTC8, LTC9 and LTC10)

Vitality and viability (Issue LTC6)

Preferred option

Issue LTC6 asked “How can Lewisham town centre’s vitality and viability be best supported?” The preferred option adopted a composite approach which drew on all eight options identified at the Issues and Options stage. In addition to an overarching policy supporting vitality and viability (LTC SH2), the Preferred Options report also identified a specific policy which highlighted the importance of supporting the vitality and viability of the market.

LTC SH2 – VITALITY AND VIABILITY [Retained with amendment]

Development should sustain and enhance the vitality and viability of the town centre in the context of the strategic development of Lewisham Gateway. To ensure this, the Council will encourage the following:

- a. Implementation of Lewisham Gateway proposals (see Core Strategy Strategic Site Allocations Policy 6);
- b. Public realm enhancements (see LTC URB6);
- c. Retail and mixed use allocations on key development sites (LTC URB4);
- d. A greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer (see LTC SH8);
- e. Incorporation of design principles such as a mix of uses, active frontages and effective street lighting with a view to making the town centre a safer place (see LTC URB4, LTC URB5 and LTC URB6);
- f. Shopfront improvements and funding programmes (see shopfront Supplementary Planning Document);
- g. A greater component of residential development within the town centre within the overall mix of uses (see Core Strategy and London Plan targets);
- h. Provision of community and leisure facilities (see LTC COM1 and LTC COM2);
- i. Retention and/or reprovision of employment and office uses in the town centre (see LTC EMP1 and LTC EMP 2); and
- j. Creation of a secondary focus of activity at the southern end of the pedestrianised High Street, incorporating a mix of uses to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development

LTC SH3 – LEWISHAM MARKET

[Retained with amendment]

The Council will continue to promote Lewisham Market as an essential part of the retail centre and encourage ancillary facilities in order to maintain its viability. The Council will investigate, in consultation with market traders, retailers and other town centre stakeholders, ways in which the Market can be improved including temporary use of the Market space for alternative activities (e.g. street food stalls or informal leisure activities) in the evenings and other times when the Market is not in use).

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Consultees were supportive of all options.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4) and the London Plan (policy 3D.1).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy and the Local Implementation Plan.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

There is a clear need for a specific policy that focuses on vitality and viability as the health of the town centre and growth potential is a major strategic planning priority for Lewisham. LTC SH2 received support during the Preferred Options consultation process including a positive representation from the GLA. A number of amendments have been made to LTC SH2 as follows:

- Specific reference to the strategic Lewisham Gateway proposals to reflect the strategic importance of this site in terms of retail growth and the overall impact of vitality and viability.
- Greater emphasis on the importance of community and leisure facilities and employment and office uses in enhancing vitality and viability.
- Promotion of the southern end of the High Street as a focus for mixed use redevelopment. The purpose of this is to address the changing gravity of the town centre resulting from the Gateway development (this final point replicates and subsumes draft policy LTC SH4).

LTC SH3 was supported by the GLA and did not receive any other consultation comments. The draft replacement London Plan (2009) places a major emphasis on vitality and viability through a number of policies including 2.15, 4.7 and 4.8. An additional principle has been identified for LTC SH3 in relation to the potential use of the market area for alternative uses outside of trading hours. This relates to an ongoing Council initiative to promote the innovative use of public spaces for recreational use.

Shopping frontages (Issue LTC8)

Preferred option

Consideration of issue LTC8 (What approach should the AAP take to the designations of core and non-core shopping frontages?) led to the identification of three draft policy statements. These statements were based on a hybrid approach to the preferred option which proposed a review of the existing allocation of core and non core frontages (option LTC8B) and the introduction of a geographical basis for designating retail zones with scope for integrating a more diverse mix of uses including evening economy activities (LTC8C).

LTC SH5 – PRIMARY SHOPPING AREAS **[Retained with amendment]**

Within the Primary Shopping Areas, as defined on Figure 4, the Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions:

- (a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1 uses and 70% maintained in A1 use);
- (b) Whether the proposal will generate a significant number of pedestrian visits; and
- (c) Whether the proposal uses vacant units (having regard both to their number within the centre as a whole and the Core Area and the length of time they have been vacant).

All proposals for non retail development within Core Areas, including where relevant changes of use, should:

- (d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and
- (e) Where appropriate, provide attractive display windows and entrances that are compatible with adjoining shop units.

LTC SH6 – SECONDARY SHOPPING AREAS
[Retained with amendment]

Within the Secondary Shopping Areas, as defined on Figure 4, proposals for development or change of use from an A1 shop will generally be acceptable provided:

- (a) It is to another A use class, community use or amusement centre where such a change does not result in an over-concentration of non A1 uses (normally 3 non A1 uses);
- (b) It does not harm the amenity of adjoining properties;
- (c) It does not harm the retail character (with reference to Policy LTC SH7), attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units; and
- (d) It is considered appropriate in relation to the area's specific retail character.

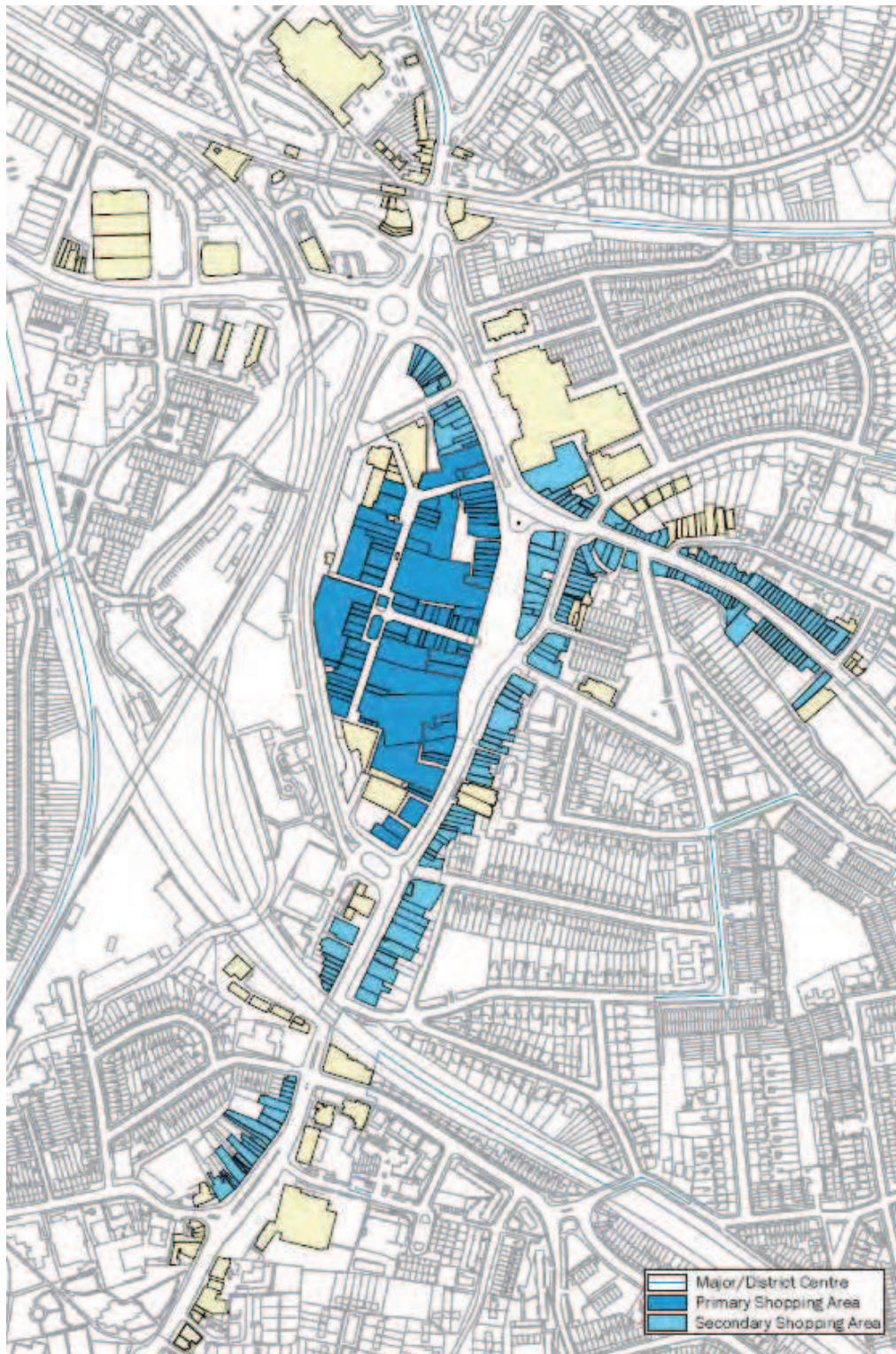


Figure 5: Primary and secondary shopping areas as defined in emerging Core Strategy (source: Retail Capacity Study 2010)

LTC SH7 – RETAIL CHARACTER AREAS

[Retained without amendment]

The town centre benefits from areas of discrete retail character which, individually and collectively contribute positively to the vitality and viability of the centre. There are also areas where major retail led developments are anticipated and the retail character that they create will be an important consideration.

Development proposals should take account of, not compromise and seek to complement existing and anticipated retail character of specific parts of the town centre as follows:

1. Lewisham Gateway

The retail character that should be aspired to in this area is a mixture of retail and leisure uses. Creation of an open space at the confluence of rivers provides opportunity for cafes, bars and similar uses.

2. Lee High Road

The western end of Lee High Road is a mixed use traditional high street with retail (A1 & A3) at ground floor and flatted accommodation above. Retailing on Lee High Road has a strong independent character and frontages are relatively short. There are already high concentrations of take-away and other non-retail uses and care will need to be taken to ensure over concentrations are not established.

3. Loampit Vale North

The retail character that should be aspired to at this 'edge of centre' location is for large retail units, with parking, to support primary shopping.

4. Ladywell Road

Ladywell is a mixed area with a good range of secondary retailing providing everyday servicing needs of the local area. Most commercial premises have shopfronts of traditional character. Ladywell Road is more residential in character, with several community uses and a limited number of commercial uses.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Option LTC8C was supported by the majority of consultation respondents, including the GLA.
- **Planning policies:** The preferred option conforms to national planning policy (PPS4) statements and the London Plan (policy 3D.1).

- **Wider policies:** The preferred option is conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The frontage policies (LTC SH5 and LTC SH6) have been retained as the Council has specifically identified an intention to identify primary and secondary areas within paragraph 6.93 of the Core Strategy. The Further Options Report replaces “Core” and “non-Core” shopping areas with “Primary” and “Secondary” shopping areas to reflect the terms used in the Core Strategy.

The GLA objected to policy LTC SH5 due to the lack of an integrated approach to managing the evening economy. It should be noted that the policy LTC SH6 makes a clear link to LTC SH7 in relation to retail character. Policy LTC SH7 (alongside LTC SH8) provides a context for the introduction of evening economy uses in secondary retail areas. It is important to note that policy 2.15 of the draft replacement London Plan (2009) promotes the identification of town centre boundaries and primary / secondary shopping areas.

Draft policy LTC SH7 has also been retained reflecting the need to create a more subtle, character based approach to defining priorities for the different parts of the town centre.

Evening economy (Issue LTC9)

Preferred option

The preferred option for issue LTC9 (How should the town centre’s potential for a more vibrant evening economy be managed?) is based on options LTC9C and LTC9D. As such, draft policy LTC SH8 seeks to encourage evening economy uses as part of a mix of uses in specified locations and concentrate evening economy uses in a particular zone.

LTC SH8 – CRITERIA FOR EVENING ECONOMY USES [Retained with amendment]

Overall approach: The Council will encourage proposals for new uses that would positively contribute to the evening economy of the town centre where the following criteria are met:

(a) The retail character of the area is not harmed (with reference to LTC SH7), and in particular the retail character of the primary shopping area;

(b) The proposal would contribute positively to the character of the particular area, as outlined in the LTC SH7; and

(c) The cumulative impact of the proposal does not unreasonably harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours.

Suitable town centre locations: It is considered that the following areas would be suitable locations for evening economy uses, as part of a wider mix of uses:

(a) Lewisham Gateway

(b) Lewisham High Street between Limes Grove and Morley Road

(c) Ladywell

(d) Lee High Road

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Respondents supported the promotion of evening economy uses in Lewisham town centre with responses showing support for options LTC9C and LTC9D.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4) and the London Plan (policy 3D.4).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The promotion of evening economy uses continues to be a priority for Lewisham town centre and it is important that the AAP defines a context for delivering this objective. The GLA objected to draft policy SH8 during the Preferred Options consultation and suggested it needed further detail of development management criteria. The council is preparing a separate Development Management DPD and proposes to include detail of such criteria through that process. Paragraphs 4.34 and 4.35 of the draft replacement London Plan (2009) highlight the importance of

supporting and managing the night time economy. No further feedback of concern was received on the draft policy and as such it has been retained without amendment.

Town centre boundary (Issue LTC10)

Preferred option

Consideration of issue LTC10 (should the town centre boundary be altered) resulted in the identification of a new town centre boundary which removed areas LTC10B(iii) and LTC10B(iv) from the town centre boundary.

LTC SH9 - TOWN CENTRE BOUNDARY [Retained without amendment]

The AAP boundary is defined as set out in the following plan:



Figure 6: Town centre boundary (solid line indicates existing boundary; dashed line illustrates amended boundary)

Reasons for selection of preferred option

The areas removed include the north-west corner of the town centre west of the DLR and north of the railway and the Conington Road area east of the DLR and north of the railway.

This preferred option was selected for the following reasons:

- **Consultation:** The preferred option is not consistent with the preference of the majority of consultees who declared a preference for maintaining the existing town centre boundary. The GLA stated that any change to the boundary of the town centre should be the result of a thorough review which would need to justify any changes to the current designation.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4).
- **Other planning reasons:** These areas are predominantly residential and therefore are considered not to contribute positively to the centre's vitality and viability. As such the removal of the two areas will result in a tighter, more logical and defensible town centre boundary.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Identification of the town centre boundary is a part of the core remit of the AAP. Feedback from the GLA to the Preferred Options consultation confirmed that there is no objection in principle to redefinition of the town centre boundary. Policy 2.15 in the draft replacement London Plan highlights the importance of reviewing and identifying town centre boundaries through the LDF process. In this context there are no further alterations to the boundary.

3.1.4 Urban design (Issue LTC11)

Preferred options

The key issue identified at the Issues and Options stage related to the approach to the location and design of tall buildings in Lewisham town centre (issue LTC 11). The criteria-based preferred option has subsequently been removed from the scope of the AAP as it repeats guidance which is identified elsewhere within the planning framework. However, a number of additional urban design policies were identified at the Preferred Options stage which expand upon the preferred options associated with other issue topics as follows:

- Mixed use (LTC URB4): LTC URB4 expands on principles “c” and “e” under policy LTC SH5 (vitality and viability). It relates to option LTC6G in response to issue LTC6.
- Urban enclosure, grain (LTC URB5): LTC URB5 expands on principle “e” under policy LTC SH5 (vitality and viability). It relates to option LTC6G in response to issue LTC6.
- Public realm (LTC URB6): LTC URB6 expands on principle “b” under policy LTC SH5 (vitality and viability). It relates to option LTC6A in response to issue LTC6.
- Enhancing Lewisham’s waterways (LTC URB7): LTC URB7 provides urban design principles that relate to LTC OS2 (Waterlink Way and Celebrating the River Confluence) and LTC ENV1 (Protect and enhance the environs of the Rivers). As such LTC URB7 relates to options LTC13C and LTC16A in response to issues LTC13 and LTC16 respectively.

LTC URB4 – MIXED USE **[Retained without amendment]**

An appropriate mix of compatible land uses will be encouraged both vertically and horizontally in Lewisham Town Centre. In particular, high density residential development above ground floor retail and commercial uses will be encouraged. Wherever possible, new development should be designed to accommodate active uses at ground floor level, with significant amount of window display and entrances.

LTC URB5 - URBAN ENCLOSURE, GRAIN**[Retained without amendment]**

Urban enclosure and urban grain play a critical role in creating good quality environments and the following principles should be considered in any proposals for development:

- (a) Public spaces should be strongly defined by the built edges that surround them and groups of building should be designed to form unified urban 'backdrops'.
- (b) Existing street patterns should be respected and where possible extended in areas of new development. Single-use and overly long blocks should be avoided.
- (c) Buildings should front public spaces, and on major streets and public spaces 'backs' of properties should be avoided wherever possible.

LTC URB6 - PUBLIC REALM**[Retained with amendment]**

Public spaces in Lewisham should be designed to be attractive, safe and robust through consideration of the following factors:

- (a) Unnecessary street clutter should be avoided, and where it is useful and functional, street furniture and lighting should be designed to delight.
- (b) The provision of public art in association with all major development in the town centre will be encouraged and should be considered at the early stages of the design process.
- (c) Development should enhance community safety through the overlooking of entrances and exits and clear definition of public and private space. Developers should show how they have taken 'Secure by Design' into account with a view to 'designing out crime'.
- (d) New development and public space improvements should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes. Enhancements to connections between the town centre and surrounding residential communities are particularly important.
- (e) The Council will promote opportunities to make innovative use of existing and

additional public realm areas as publicly accessible open space that can be used for recreation purposes and events and footways and civic spaces need to be generously sized, designed and managed accordingly.

(f) Development should ensure that the public realm and development projects incorporate inclusive design principles. The Council will also seek to make provision for shopmobility initiatives.

LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS

[New policy]

The Council will seek to protect and enhance the environs of the River Quaggy and the River Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the de-culverting of rivers and programmes of naturalisation of riparian environments. Proposals should also respond positively to waterway heritage.

The Council will seek to safeguard Waterlink Way and the East London Green Grid network, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency and the GLA.

The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park as shown in Figure 3.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Consultees were supportive of the options that informed policies LTC SH5 (vitality and viability), LTC OS2 (Waterlink Way and Celebrating the River Confluence) and LTC ENV1 (Protect and enhance the environs of the Rivers)
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS1, PPS4, PPG17, PPS25) and the London Plan (policies 3D.1, 3D.7, 4C.3, and 4C.31).

- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy and the Local Implementation Plan.
- **Other planning reasons:** In relation to LTC URB7, the two river channels are both heavily degraded and currently have little amenity or ecological value. Restoration of the river environment, funded by developer contributions, would provide Lewisham town centre with a new focal point and amenity space for recreational purposes to be used by visitors and residents alike. This is particularly important as residential densities rise and pressure on existing open spaces is increased.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Consultation feedback on the Preferred Options report indicated a high degree of support for the draft policies. In particular the GLA identified support for LTC URB4, LTC URB5, LTC OS2 and LTC ENV1. In this context, LTC URB4 and LTC URB5 have been retained without amendment.

The GLA and the Environment Agency identified two omissions which have been incorporated as follows:

- Additional references to “designing out crime”, inclusive design principles and shopmobility schemes within LTC URB6; and
- Reference to waterways heritage within LTC URB7.

Point “e” has been added to LTC URB6 to reflect the ongoing Council initiative to promote the innovative use of public spaces for recreational use and consultation feedback as highlighted above.

The Metropolitan Police asked for Secure by Design principles to be referred to in LTC URB6 – which has been done.

The Environment Agency highlighted a need for more explicit reference to flood risk and Planning Policy Statement 25. This is dealt with under the new policy heading in section 3.3.

The replacement draft London Plan (2009) continues to place significant emphasis on the importance of design excellence in relation to architecture and the public realm as set out in policies 7.4 and 7.5.

3.1.5 Employment and business (Issue LTC12)

Preferred option

The preferred option for LTC12 (What policy approach should be taken to existing established industrial areas and business uses in the town centre?) embraced two draft policy statements (LTC EMP1 and LTC EMP2). This position was based on a balanced approach which incorporates all of four options considered.

LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE [Retained with amendment]

Molesworth Street will be protected as an employment site in line with the site's designation as a Local Employment Location in Core Strategy Policy 2.

In general, the Council will seek to retain or re-provide existing employment uses in the town centre (uses falling within the category of Use Class B).

In recognition of the opportunity to enhance vitality and viability of the town centre, the Council will consider redevelopment or conversion of other employment sites/buildings for a mix of uses. It is envisaged that redevelopment proposals will enable the intensification of sites and as such there is an opportunity to re-provide employment floorspace as part of a wider mix of uses, including residential. Employment sites which will be considered for redevelopment include the following:

- (a) Former Beatties building (offices over ground floor retail);
- (b) Engate Street;
- (c) Thurston Road and Jerrard Street;
- (d) Conington Road; and
- (e) Citibank Tower.

The conversion of other existing employment sites to a mix of uses including residential may be considered acceptable where:

- (a) The building has been vacant for at least 2 years and appropriately marketed for that length of time, and evidence is provided to this effect; and
- (b) The scheme will considerably assist in meeting other regeneration objectives such as:
 - Improvement to the vitality and viability of the town centre;
 - Meeting the Borough's housing priority needs; and/or

- The provision of community and leisure facilities within an accessible and socially inclusive location.

(c) The design is capable of longer term adaptation

LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE [Retained with amendment]

Lewisham Town Centre is the preferred location for large scale office development in the Borough and the Council will seek to promote new office development where appropriate. The Council will resist the loss of office space in the town centre with reference to the criteria identified in LTC EMP1. Where redevelopment entails the loss of office uses, proposals will be encouraged to re-provide this office space in a modern format.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Options C and D were the options favoured most by consultation respondents, and are incorporated in the preferred option.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4) and the London Plan (policies 3B.3).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Office and employment uses play a key role in contributing to the overall vitality and viability of Lewisham town centre and as such both policies are retained in the Further Options Report.

However, both the GLA and LDA objected to LTC EMP1 stating that the approach was too relaxed and did not provide sufficient restrictions to the loss of employment land. The objection stated that the Council should ensure the criteria in the Mayor of London's Industrial Capacity SPG are addressed. Areas for release should be specifically identified through the Area Action Plan process rather than through allowing loss of employment land after proof of vacancy. The

submission also noted that if any release of employment land is permitted, the period of which buildings need to be vacant and marketed should be extended to two years in line with the adopted Industrial Capacity SPG.

Policy LTC EMP2 has been updated to strengthen the position in relation to employment. The policy now distinguishes between designated employment sites (i.e. Molesworth Street which is a Local Employment Location) which are protected accordingly, and general town centre sites which do not have a formal employment designation. The policy now places greater emphasis on re-provision of employment uses which contrasts to the previous version which implied loss of office uses. The wording of LTC EMP2 has been updated to reflect the strengthening of LTC EMP2.

Policies 4.2 to 4.4 of the draft replacement London Plan (2009) outline the emerging policy position in relation to employment and office uses and the management of designated industrial sites. This guidance resonates with the approach of the Further Options Report.

3.1.6 Transport (Issue LTC15)

Preferred option

The preferred option for issue LTC15 (In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?) is based on option LTC 15B which promotes the retention of the existing levels of public parking.

In addition to the preferred approach to public / shopper spaces set out in LTC TRS2, the Preferred Options report also identifies draft policy statements relating to cycling and walking (LTC TRS3) and mitigation against the impact of roads and roundabouts (LTC TRS4).

LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE

[Retained with amendment]

The Council will seek to retain the quantum of existing public /shopper parking spaces in the town centre as a minimum level. The Council will, where possible, also seek to broadly maintain the existing ratio of parking spaces to retail floorspace through a moderate increase in provision in line with an expansion in retail floorspace. The development of the following opportunity areas and sites are expected to involve a significant amount of new retail floorspace and all existing

and any new associated parking spaces should be publicly accessible.

- (a) Hartwell Ford site
- (b) Conington Road Opportunity Area
- (c) Loampit Vale Opportunity Area
- (d) Ladywell Leisure Centre

LTC TRS3 – CYCLING AND WALKING ROUTES

[Retained without amendment]

Opportunities should be maximised to enhance routes such as Waterlink Way, and to connect other parts of the town centre into the wider cycling and pedestrian network that links with surrounding areas should be maximised.

LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS

[Retained with amendment]

The Council will support measures to improve the visual, and pedestrian and cyclist experience of the town centre, including at the following locations:

- (a) Northern roundabout;
- (b) Loampit Vale;
- (c) Lee High Road and Belmont Hill;
- (d) Lewisham High Street;
- (e) Molesworth Street;
- (f) Southern roundabout; and
- (g) The junctions at Ladywell Road / Lewisham High Street / Courthill Road.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The most popular options were the rationalisation of existing provision to encourage increased use of public transport (option LTC 15A) and the retention of existing levels of parking (option LTC 15B). The GLA and TfL both stated support for option LTC 15A. Consultation support for the encouragement of public transport (option LTC15A) as well as wider support for public realm enhancements (option LTC 6A) necessitated the identification of specific policy statements to provide a context for an improved street environment for walking and cycling (LTC TRS3 and LTC TRS4).

- **Planning policies:** The preferred option conforms to national planning policy statements (PPG13 and PPS4) and the London Plan (policy 3C.23).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Other planning reasons:** Notwithstanding the response received from the GLA, the preferred option indicated that existing levels of public parking in Lewisham town centre should be retained in line with option LTC15B. It is important to maintain the existing level of public parking, and to allow a moderate increase in line with a growth in retail floorspace with a view to maintaining and enhancing the competitive position of the town centre.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The GLA registered support for LTC TRS2, LTC TRS3 and LTC TRS4 during the Preferred Options consultation. Chapter 6 of the draft replacement London Plan (2009) identifies a series of policy priorities which provide a supportive context for the emerging AAP policies above.

In addition, the rationale for the preferred option continues to apply. If Lewisham is to achieve Metropolitan Town Centre status it must continue to be competitive with other comparable Inner London town centres. The AAP promotes a context for enhanced public transport accessibility, but the centre must be attractive for car borne shoppers as well. The Council's public parking strategy is a pragmatic one. The existing Clarendon and Slaithwaite surface car parks are retained and continue to serve traffic arriving from the east and south respectively. Development of the Ladywell Leisure Centre site has some potential for further public parking for traffic coming from the south, development of sites in Thurston Road provides some public car parking for traffic coming from the west and existing car parking associated at the Tesco store continues to provide public car parking for traffic coming from the north. All of these car parks should prioritise disabled drivers and those with children. The provision of public parking at these key gateways into the town centre, coupled with improved signs and real-time information on the availability of spaces, should help enable drivers park at the first available parking area and help prevent through-traffic from those circling to find a parking space. In support of the edge of centre provision, the Lewisham centre multi-storey car park and the Molesworth Street surface car park will continue to provide central parking.

The principal amendment to LTC TRS2 relates to the identification of specific sites for publicly accessible car parking. In response to representations on the

Preferred Options report and further analysis of deliverability, the Engate Street site is no longer identified as a location for additional car parking. Since the publication of the original report, the Ladywell Leisure Centre has come forward as a potential development site and may be appropriate for some public car parking as part of a wider mix of uses.

3.1.7 Community and leisure

Preferred option

Previous stages of the AAP process identified a specific approach to options and preferred options as informed by wider Council decision-making issues which were progressed outside of the planning process.

The key issue was the identification of the location of a new secondary school in the town centre. Following detailed process of options development and appraisal, Lewisham Bridge School was selected as a preferred option. As identified in section 1.2.3, proposals for Prendergast Vale College have now received planning consent and construction is targeted to commence in early 2011 which removes the need for a specific preferred option policy position in relation to secondary school provision.

In a similar context, the need for a specific policy position relating to leisure centre provision has also been removed following confirmation that a new leisure centre will be delivered on the Loampit Vale site which will replace Ladywell leisure centre. In line with option LTC 6G, the Preferred Options Report also recognised the need to promote a mix of uses to support overall vitality. In this context, the following draft policy statement has been identified:

LTC COM3 – RANGE OF COMMUNITY, LEISURE AND ENTERTAINMENT SPACES

[Retained with amendment]

In order to contribute to town centre vitality, the Council is supportive of the provision of a flexible community spaces along with a range of leisure and entertainment uses in Lewisham Town Centre. In particular, the Council will be supportive of proposals for a cinema in the town centre, and a site at the northern end of the centre, such as the Lewisham Gateway site, is considered to be an appropriate location.

The AAP is proactive in identifying opportunities for additional community and leisure facilities as follows:

- Refurbishment of the Playtower building on Ladywell Road into a multi-use community asset
- Potential for further enhancement of the Leemore Resource Centre on Lee High Road.

The Loampit Vale Leisure Centre will provide a significant improvement in the provision of indoor sports and leisure facilities in the town centre, enabling the development of the Ladywell Leisure Centre site for other uses. The redevelopment of other existing community, leisure and entertainment spaces for alternative uses will only be permitted if it can be demonstrated that:

(a) the facility is no longer needed or an equivalent facility can be replaced at an alternative site with an equal or improved level of accessibility;

(b) the locational requirements for the facility are not met;

(c) the facilities need updating which cannot be achieved at a reasonable cost; and/or

(d) alternative provision of equivalent benefit to the community is made.

Opportunities also need to be maximised for the provision of enhanced/additional leisure and sports facilities in and around the town centre.

Justification of policy retention and amendments

There continues to be a need to promote community, leisure and entertainment uses within the town centre to contribute to overall vitality in line with PPS4. It should also be noted that the GLA registered support for LTC COM3 which continues to be reflected within chapter 3 of the draft replacement London Plan (2009).

Government Office for London highlighted an opportunity to make the policy more specific to the town centre. The policy statement above has therefore been altered to provide a clearer and more positive overview of proposals for community, leisure and entertainment facilities proposed within the town centre.

The Council is working with Voluntary Action Lewisham, a local church group and others to develop a project for the refurbishment of the Playtower Building on Ladywell Road into a multi-use community asset. This would involve establishing

a trust and transferring the building out of Council ownership. Further needs for community premises, including the apparent demand for additional churches (as evidenced by the number of unauthorised churches in the Thurston Road area) will be informed by the Council's emerging Community Premises Strategy.

Additional options associated with social infrastructure provision are outlined in the new options section in 3.3.

3.1.8 Monitoring

Preferred option

Government guidance outlines a clear requirement for monitoring as part of the plan-making process. As such the following policy was prepared at the Preferred Option stage without the need for specific issues and options.

LTC IMP1 – MONITORING **[Retained with amendment]**

The Council will facilitate the monitoring of the AAP through the monitoring framework and the following interventions:

- (a) Adherence to PPS4 recommendations for town centre healthcheck monitoring;
- (b) Monitoring progress on planning applications;
- (c) Reporting progress on infrastructure delivery to the Asset Management Board and Sustainable Development Partnership; and
- (d) The inclusion of a town centre specific section in the Annual Monitoring Report (AMR)

The full monitoring framework including indicators, targets, trends and indicator sources, can be viewed in Appendix 4.

Justification of policy retention and amendments

The requirement for a clear and effective approach to monitoring continues to apply and the draft policy statement has been subject to minor updates to reflect the approach taken to monitoring within the Core Strategy. LTC IMP1 received support during the preferred options consultation. The identification of the preferred option has also been tested through the Sustainability Appraisal/SEA.

B. New options, preferred options and policies

3.1.9 Overview

The Further Options Report draws on a detailed review of consultation comments, the updated evidence base, alterations in the planning policy framework and changes in the wider policy position, recent development activity and changes in the economic and public sector spending climate. In this context, new options, preferred options and draft policy statements have been identified for the following planning issues:

- Decentralised energy;
- Social infrastructure; and
- Implementation.

Each of these new policy topics is structured using the same comprehensive approach as utilised in the Preferred Options report as set out below. In replicating the structure of the Preferred Options report for these new policy topics, the Further Options Report ensures that all policy topics have been subject to a consistent and equivalent process of review.

- Issue – concise overview of the issue in question;
- What do other plans and programmes say?
- Options – overview of the alternative options available;
- Consultation – feedback through consultation to date;
- Preferred option – summary of the preferred option;
- Draft policy – articulation of the preferred option as a draft policy; and
- Reasons for the preferred option.

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out from section 3.1.9 to section 3.1.11. In particular, we would ask you to regard the following matters:

- Are there any additional area-wide issues needing consideration in the AAP?
- Do you have any comments on the new options, preferred options or proposed policies put forward?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

3.1.10 Energy strategy

Issue

The Energy Strategy is one of the key areas that has moved on since the preparation of Preferred Options Report in 2007. As part of the Further Options process, the Council has initiated a focused study (Low Carbon and Decentralised Energy Strategy Recommendations, December 2010) to examine the CO₂ reduction agenda in the context of Lewisham Town Centre with a view to informing the development of a specific policy for the AAP. The full study report, which has informed the strategy outlined below, is available as part of the evidence base to the Further Options Report.

LTC 17:

What are the major opportunities for CO₂ emission reduction in Lewisham Town Centre? What role, if any, should DE play in minimising CO₂ emissions in Lewisham Town Centre? Is DE realistic and if so what options are there for delivering it?

What do other plans and programmes say?

The London Plan

The London Plan has been a driver of energy policy and its evolution is therefore of relevance when considering the future of energy in the built environment for the capital, particularly the energy requirements placed on developers of new sites and the energy solutions that therefore may emerge.

In relation to energy policy, emphasis on specific renewable targets appear to be disappearing in favour of an overall CO₂ emissions reduction target, with a suggested figure of 44% reduction from Part L 2006 for the first 3 years to 2013. However the requirement to consider decentralised energy is expected to still remain. There is some uncertainty whether this figure is to apply to the 'total' emissions (including appliance load) or whether it only applies to the regulated load that is covered by the Building Regulations. If the latter applies then the new targets appear to be lower than those that are currently set.

Lewisham Core Strategy Policies

These emerging policies support the Council's ambition for Lewisham to play a leading role in responding to climate change - locally, regionally and nationally as outlined in the Lewisham Climate Change Strategic Framework.

Emerging Core Strategy Policies 7 and 8 endorse the use of the following energy hierarchy:

- Use less energy ('Lean')
- Supply energy efficiently ('Clean')
- Use Renewable Energy ('Green')

Emerging Core Strategy Policy 8 states that proposals for major developments (with a floorspace of 1,000 sq.m or 10 residential dwellings or more) will be required, amongst other things, to:

- Submit a Sustainability Statement and Energy Statement that show how the requirements of London Plan policy and the London Plan SPG on Sustainable Design and Construction, or any subsequent document, are met and demonstrate what steps have been taken to minimise the environmental impacts of the proposed development maximise the energy and water efficiency measures of the building
- Connect to an existing or approved decentralised energy network, safeguard potential network routes, and make provision to allow future connection to a network or contribute to its development, where possible within the Regeneration and Growth Areas
- Integrate on-site renewable energy generation into the design of a building to ensure CO₂ emission reductions are maximised
- Fully contribute to CO₂ emission reductions in line with the regional and national requirements, and make a financial contribution to an offset fund if this cannot be adequately achieved on site.

A focus on demand reduction should always be the first step in CO₂ emission reduction

Options

For new buildings and major refurbishment the improvement in energy efficiency of buildings is being driven through the Building Regulations and for the existing stock improvements will come through other national policy. The AAP needs to facilitate good practice in the Clean and Green steps of the hierarchy.

Options

'Clean' and 'Green' carbon emission reductions can be achieved through application of the following list of low carbon and/or renewable energy technologies:

- **Option 17A:** Solar thermal (ST);
- **Option 17B:** Photovoltaics (PV);
- **Option 17C:** Wind turbines;
- **Option 17D:** Gas-fired CHP;
- **Option 17E:** Biomass or bio-fuel fired CHP;
- **Option 17F:** Air source heat pumps (ASHP);
- **Option 17G:** Ground source heat pumps (GSHP); and
- **Option 17H:** Decentralised energy

The Energy Strategy Recommendations report summarises the suitability of the various technologies outlined above in relation to achieving the AAP aspirations in relation to CO₂ emissions reduction.

Consultation

During the Preferred Options consultation, the GLA indicated that the Area Action Plan should give greater consideration to decentralised energy options. The draft policy set out below will be reviewed in response to consultation on the Further Options Report.

Preferred option

A coordinated strategy is required to inform specific energy strategies within different parts of the town centre and on specific sites or clusters of sites. In this context, the following observations are relevant:

- PV technologies are best placed to offset electrical load.
- Gas-fired CHP and solar thermal are effective at offsetting heat load (together with electricity in the case of CHP).
- The CHP option can be implemented at either a building or a community scale.

Based on this analysis, the Energy Strategy Recommendations report indicates that whilst a range of technologies are potentially suitable, the following measures are the preferred options in relation to the town centre:

- Solar thermal (Option 17A)
- Photovoltaic panels (Option 17B);
- Gas-fired CHP (Option 17D); and
- Decentralised Energy (Option 17H)

The fragmented nature of development timetables for key sites precludes the development of a large scale decentralised energy network in the short to medium term. As such the AAP energy strategy offers a pragmatic approach which recognises the varying trajectories, phasing constraints and delivery fixes for key sites. The preferred option therefore focuses on the implementation of small schemes and a longer term plan to join individual schemes together, as is encapsulated in the London Heat map initiative.

The Council will take the following steps to monitor opportunities for decentralised energy in the town centre:

- Identify new and refurbished sites of relatively high density or large heat load.
- Identify new sites which, as part of a response to the London plan or other policy requirement, are already considering a district heat network.
- Link associated timescales of development or refurbishment with that of the AAP and of other identified sites in the vicinity.
- Establish a 'watching brief' for those sites that don't immediately fit in terms of timescale or proximity.
- For those sites that appear to have synergy, look in further detail at the characteristics of the sites e.g. in terms of logistics with respect to distance and complexity of connection, to rule out any logistical or other fundamental constraints.
- Retain any sites discarded at this stage on the 'to watch' list.
- For the short list of sites, facilitate further detailed assessment of logistical and technical issues such as potential energy centre locations, connecting pipework routes and operator issues.

Potential clusters

The Council will seek to promote the following decentralised energy clusters:

Cluster 1: Loampit Vale

This is a potential future cluster and should be placed on the 'to watch' list. This system would comprise two energy centres and resilience linking, as well as the possibility for connection to the swimming pool as and when there is a major pool refurbishment. In addition an expansion in retail floorspace, the Tesco site has

capacity for a significant number of new homes and an energy centre. Although beyond the timescales of the AAP, the existence of an energy centre at Loampit Vale South and the development of one on the Tesco site could act as a catalyst for future linkages to developments in the area, including on Thurston Road.

Cluster 2: Lewisham Gateway

The outline consent for Lewisham Gateway makes provision for an energy centre and there is scope to consider longer term options to link into adjacent sites as the detailed scheme for the Gateway is progressed. In terms of planning for a phased approach it is recommended that the solutions for early phases are based on the installation of temporary high efficiency gas boilers, used to provide heat and establish the concept of district heating. Then once a critical mass on installation has been established the connection and conversion into a wider system can be progressed. Potential anchor loads include the Lewisham Centre.

Cluster 3: Ladywell Road area

This area is part of Lewisham's Low Carbon Zone where Lewisham is working with the Mayor of London, GLA and a range of public, private and community sector groups to deliver a reduction in CO₂ emissions of 20% by 2012 and a 60% reduction by 2025. The Ladywell Leisure Centre is a key Council-owned development site and there is an opportunity to incorporate decentralised energy, possibly linking into University Lewisham Hospital to the south of the AAP area.

For the reasons set out above, above and identified in greater detail in the energy strategy recommendations report, the preferred option is to require all 'major developments' to integrate clean and green technological solutions that maximise CO₂ emission reductions and ensure future development of cluster and area-based DE networks are promoted and protected. This adopts a pragmatic approach which reflects current policy guidance, draws on a qualitative assessment of energy loads and responds to the likely phasing and varying implementation programmes and technical fixes for key sites.

Draft policy

NEW POLICY 1 – CARBON DIOXIDE EMISSION REDUCTION IN LEWISHAM TOWN CENTRE

All proposed development will be expected to minimise energy consumption through the adoption of sustainable design and construction methods.

Prospective developers are encouraged to liaise with the Local Planning Authority at the pre-application stage when considering potential site-specific energy strategies. Planning applications for 'major development' are expected to be supported by a Sustainability Statement and Energy Statement (in accordance with Core Strategy Policy 8) which, amongst other things, provides a comprehensive assessment of the nature of heat and electrical loading to inform the approach.

The following methods should be considered as part of potential energy strategies:

- PV technologies to offset electrical load.
- Gas-fired CHP and solar thermal to offset heat load (together with electricity in the case of CHP).
- CHP option, which can be implemented at either a building or a community scale.

All 'major development' will be expected to incorporate communal heating which future-proofs the development and allows for larger scale decentralised energy clusters to be developed in the medium to long term, in some cases beyond the plan period. Where it has been demonstrated that a communal heating system would not be the most suitable option in the short to medium term, the development should ensure a connection can still be facilitated in the medium to long term. In doing so developments should:

- Incorporate energy centres that are appropriately sized not only to accommodate the interim requirements of CHP/other centralised plant, but to accommodate a 'consumer substation unit' – to provide all the necessary equipment for a connection to a heating network and for domestic hot water preparation;
- Where a communal heating system is not installed, incorporate pipework to the edge of the site, ensuring the likely shortest distance to future networks;
- Locate energy centres close to a street frontage (but without creating 'dead frontage' to a street), ensuring the likely shortest distance to future networks; and
- Safeguard routes from site boundaries to energy centres to enable a connection to be made to a network in the future.

The Council will actively pursue options for decentralised energy by, amongst other things:

- Monitoring opportunities and managing and co-ordinating development proposals;
- Working with public and private sector stakeholders;
- Facilitating further detailed assessment of logistical and technical issues such as potential energy centre locations, connecting pipework routes and operator issues for sites/clusters that have potential; and
- Working with Transport for London and utility companies, seek to facilitate potential pipework routes when undertaking any major highway works.

Reasons for the preferred option

The preferred option balances a flexible approach to allowing developers to identify the most appropriate technological solution to reduce CO2 emissions, with the need to future-proof all developments to ensure the longer term viability of a potential DE network. The identification of the preferred option has also been tested through the Sustainability Appraisal/SEA.

3.1.11 Social infrastructure

Issue

At the Issues and Options stage (2005), a small number of policy topics were highlighted as “other issues” for consideration under the Community and Leisure heading. Whilst relevant to the AAP, they were not considered key town centre issues that required specific options at that stage in the plan-making process. The specific policy topics are:

- Ensure adequate provisions of education and community facilities.
- Prevent the loss of existing leisure, community, arts, cultural, entertainment, sports, health care, child care and education facilities as a consequence of redevelopment or change of use

The loss of existing facilities is covered by general policies in the London Plan and the Council’s emerging Core Strategy. The need for community facilities is addressed under Community and Leisure above. Social Infrastructure, in terms of education, health and child care is an area which has been identified as a potential gap in the scope of the AAP. In order to bring the social infrastructure topic area up to the same level of detail as other AAP policy topics, the following new issue has been defined:

Issue 18:

What social infrastructure is required to support the projected growth in the town centre during the plan period?

What do other plans and programmes say?

PPS1 requires the Development Plan Documents to promote development that creates socially inclusive communities. In particular the Council needs to ensure the social impacts of development are considered and taken into account and social inequalities are reduced.

The existing and draft replacement versions of the London Plan aim to protect and enhance social infrastructure and community facilities which encompasses the voluntary and community sector. Core Strategy policies 19 and 20 promote the provision and maintenance of community and recreational facilities and the delivery of educational achievements, healthcare provision and promotion of healthy lifestyles. The Lewisham Social Inclusion Strategy seeks to ensure that all relevant services can work together to achieve social inclusion for all.

Options

Option 18A

Increase primary school capacity in the Primary Place Planning Localities that serve the town centre

Option 18B

Increase secondary school capacity

Option 18C

Define a specific childcare approach for the town centre

Option 18D

Increase primary health care provision

Consultation

The Council has undertaken focused stakeholder consultation with representatives from key Council departments and partner organisations such as NHS Lewisham. This has informed the identification of a composite preferred option and the preparation of a draft policy statement.

Preferred option

The preferred option is a composite of options 18A to 18D. As set out in the policy statement, the scope of emerging guidance varies depending on the extent of town centre need for each aspect of the preferred option.

Draft policy

NEW POLICY 2 – SOCIAL INFRASTRUCTURE

The Council working with public, voluntary, community and private sector partners will ensure that social infrastructure provision in and around the Town Centre is sufficient to support the growth promoted by the AAP and that it is delivered in a timely manner that keeps pace with the delivery of additional homes.

Primary School Capacity

Primary places in the Borough are managed on the basis of six Primary Place Planning Localities (PPPLs). There are two PPPLs that cover the town centre and

surrounding areas; Lee Green (PPPL2) and Lewisham/Brockley (PPPL3). The IDP takes account of the level of change advocated in this Further Options report and looks ahead 10 years. Taking the two PPPLs that serve the Town Centre together, the expected need is for an additional 284 places (9.5 Forms of Entry) by 2012/13, although this is projected to reduce slightly by 2019/20.

Possible ways for meeting this projected demand, over and above the committed expansion of Brockley and Gordonbrock (1 FE and 0.5FE respectively), include expanding existing schools where sites are large enough, identifying sites which may be re-commissioned as schools and identifying new sites

Secondary School Capacity

Prendergast Vale new all-through School will see an extra 120 secondary school places a year in the town centre area from 2012. Expansions at other secondary schools in the Borough (most notably Prendergast Ladywell Fields in 2009/10) will deliver an additional 135 secondary spaces between 2009/10 and 2012. Nevertheless, the IDP identifies a need for a possible additional 400-600 secondary school places by 2019/20. Secondary school place provision needs to be tackled at a Borough-wide level and the Council will seek to work with its partners to identify and bring forward the required additional capacity.

Childcare

The Council's Childcare Sufficiency Review (March 2008) reported on a study into childcare facilities across the borough (based on the four children centre service areas). This found that every ward in the borough had considerable capacity, with childcare place vacancy rates of between 7 and 26%. However, supply in Area 2, which includes the town centre, was found to be 'tight' – particularly in the Blackheath area. The Council is currently undertaking a further sufficiency review.

Primary Health Care

The proposed population increase in the three wards that comprise the town centre and surrounding area of 5,460 up to 2021 will require an additional 3 GPs (based on the ratio of 1 GP per 1,800 people). NHS Lewisham considers that there is currently sufficient physical capacity to accommodate 3 GPs within the five GP surgeries that border the town centre, although investment will be needed for some of the existing premises to make them fully fit for purpose. Lewisham NHS Hospital Trust is also proposing to provide an Urgent Care facility on the Hospital site and NHS trusts and the Council need to work together to ensure that there is sufficient space in the area to accommodate the proposed shift of 'first'

appointments from acute to primary/community sites in Lewisham by the middle of 2011.

The proposed population increase will require an additional 3 dentists (based on the ratio of 1 dentist per 2,000 people). There is considered to be sufficient vacant/proposed new non-residential space in appropriate locations (including the Lewisham Gateway Site) to easily accommodate this requirement.

Reasons for the preferred option

The preferred option conforms to the requirements of the planning framework as outlined above. The policy statement identifies specific growth targets and sites as appropriate, based on Council and partner-led infrastructure planning. The identification of the preferred option has also been tested through the Sustainability Appraisal/SEA.

3.1.12 Implementation strategy

Issue

The Preferred Options report identified implementation as a general issue to be incorporated within the scope of the AAP as a Development Plan Document. The increasing emphasis on delivery alongside the detailed development of the borough-wide approach to implementation means that there is a need for a comprehensive review of the AAP implementation strategy.

Issue 19

What approach should the AAP take to delivery and implementation?

What do other plans and programmes say?

PPS12 emphasises the importance of the deliverability of plans and the need for local planning authorities to demonstrate that necessary infrastructure to support the delivery of the the visions and proposals in Development Plan Documents.

The Core Strategy identifies the following principal aspects of delivery:

- Create the conditions required to stimulate investor confidence;
- Work with and encourage developers and landowners to bring forward land and buildings for re/development;
- Engage with other public sector stakeholders and the voluntary sector responsible for the delivery of different aspects of the Core Strategy;
- Promote and encourage the delivery of design excellence and innovation to provide the highest design quality;
- Secure necessary transport improvements, accommodate new public transport infrastructure, enhance the public realm and improve walking and cycling conditions; and
- Put in place measures to oversee the management and co-ordination of infrastructure delivery within the borough.

Options

Option 19A

Rely on the Borough-wide approach to implementation

Option 19B

Define a bespoke town centre implementation strategy

Consultation

Consultation feedback on the Preferred Options report reinforced the need for a comprehensive approach to implementation.

Preferred option

The preferred option is a hybrid of both 19A and 19B. The following policy identifies area-wide implementation strategies alongside specific town centre interventions.

Draft policy

New Policy 3

The Council will implement the AAP by working with public, voluntary, community and private sector partners and co-ordinating action, including:

- (a) Allocating sites for particular uses;
- (b) Engaging in pre-application discussions with prospective developers;
- (c) Using the Lewisham Design Panel to help secure high quality design;
- (d) Requiring planning applications to address the AAP's vision, objectives and policies;
- (e) Developing and selling its own land;
- (f) Where appropriate using its compulsory purchase powers;
- (g) Implementing the Infrastructure Delivery Plan, Local Implementation Plan and Borough Investment Plan;
- (h) Partnership working; and
- (i) Planning Obligations/Community Infrastructure Levy.

Site Allocation

The emerging Core Strategy identifies Lewisham Gateway as one of five strategic sites and formally allocates land for the provision of significant highway changes and a mixture of uses. The AAP will also allocate sites in the town centre for particular uses and provide specific policies for their development. The Site Allocations DPD Further Options Report (public consultation commenced October 2010) identified the Watergate School site (within the Ladywell Road character area as a gypsy and traveller site.

Pre-application Service

LBL encourages early discussions with officers, so that they can help to improve the quality of design, encourage greater public consultation, and give greater

certainty to developers when developing their proposals. Discussions will be focused on emerging design and access statements with thorough site analysis. The planning case officer will co-ordinate design advice from both within LBL, Lewisham Design Panel and from external organisations (such as the Greater London Authority Planning Decisions Unit) to ensure that developers and their design teams receive timely and focused design advice and that they are not presented with conflicting advice from multiple sources.

Lewisham Design Panel

The Council operates a design panel of councillors and locally-based architects and other built environment professionals to help ensure that development proposals are of the highest design quality and fully reflect and make a positive contribution to local context and character. Prospective developers of major proposals will be expected to present emerging proposals or the town centre to the Panel at an appropriate stage of design development.

Supporting Documentation

Design and Access Statements are a national requirement and LBL's Local Validation Requirements for Lewisham (July 2008) sets out additional documents that will be expected to support major planning applications in the Borough. All documents that accompany planning applications for sites in the town centre should demonstrate how the proposals would:

- Make a positive contribution towards the realisation of the vision, objectives and policies in the AAP; and
- Enable (and in no way prejudice) future development in the rest of the area from doing the same – including the phased delivery of larger sites.

LBL Owned Property

Subject to satisfying legal and strategic policy requirements, the Council will use and dispose of property it owns in the town centre in ways that will help deliver the AAP's vision, objectives and policies.

Compulsory Purchase

LBL will consider using its compulsory purchase powers where this would help secure the delivery of high quality development that is in line with the AAP vision, objectives and policies.

Infrastructure Delivery Plan

LBL has prepared a borough-wide Infrastructure Delivery Plan (IDP) in order to:

- Identify infrastructure needs and costs (including where possible phasing of development, funding sources and responsibilities for delivery);
- Further strengthen relationships between the Sustainable Community Strategy and Local Development Framework (LDF);
- Improve lines of communication between key delivery agencies and the local planning authority;
- Identify opportunities for integrated and more efficient service delivery and better use of assets;
- Provide a sound evidence base for funding bids and prioritising the deployment of allocated funding;
- Help facilitate growth in Lewisham and other growth and regeneration areas; and
- Integrate with the Planning Obligations SPD and provide the basis for any Community Infrastructure Levy charging schedule.

The IDP (current draft as of August 2010) is a 'live' document that will be used as a tool for helping to deliver infrastructure and will be monitored and revised as necessary. Its implementation will be led by Lewisham's Asset Management Board (AMB), which will report to Sustainable Development Partnership (SDP) – one of the thematic partnerships of the Local Strategic Partnership.

Local Implementation Plan

LBL will continue to use the Local Implementation Plan (LIP) process to identify and secure funding for improvements that better manage road traffic, improve public transport accessibility and promote walking and cycling in the town centre.

Borough Investment Plan

LBL is in the process of agreeing a Borough Investment Plan (BIP) with the Homes and Communities Agency (HCA) to guide public sector investment in new homes and supporting infrastructure.

Partnership Working

LBL will work as part of the Local Strategic Partnership (which includes senior representatives from Lewisham's public, private, voluntary and community sector

organisations) in delivering the vision, objectives and policies of the AAP. LBL will also work with other partners, including local businesses, the Greater London Authority, London Development Agency, Transport for London, Network Rail, rail operators, the Environment Agency, landowners and developers (through the Major Developers' Forum), utility companies (through the Lewisham Utilities Network), and others to deliver strategic change.

Planning Obligations/Community Infrastructure Levy (CIL)

LBL is in the process of adopting a Planning Obligations Supplementary Planning Document (SPD) – which sets out a tariff-based approach to the negotiation of financial contributions from developers active within the area, in line with the relevant legal and policy tests. LBL may pool contributions in order to meet significant infrastructure requirements (including those set out in the IDP).

The CIL Regulations (April 2010) introduce a new tariff for raising funds from developers to help deliver infrastructure (but not affordable housing) that LBL could use and scale back the use of planning obligations. On the local adoption of CIL or nationally from April 2014, the Regulations restrict the local use of planning obligations for pooled contributions, allowing pooled contributions to be sought to mitigate the cumulative impacts of developments from no more than five schemes.

C. Policies which have been deleted

3.1.13 List of policies

The following policies have been identified for removal from the emerging AAP. Appendix 3 details the rationale for this and identifies the documents that include policies that sufficiently address Lewisham Town Centre issues..

Please consider the key consultation questions set out in section 1.3 in relation to each of the removed policy options set out in section 3.1.12. In particular, we would ask you to regard the following matters:

- Do you have any comments on the removed policy options (See Appendix 3 for detail of removed policies)?
- Do you have any other comments?

LTC HSG1 MEETING HOUSING NEED

LTC HSG2 MIXED USE DEVELOPMENT

LTC HSG4 AFFORDABLE HOUSING

LTC HSG5 DWELLING MIX

LTC HSG6 HOUSING DENSITY

LTC HSG7 A RESTRICTIVE APPROACH TO RESIDENTIAL PARKING

LTC HSG8 TRAVELLERS' SITES

LTC HSG9 RESIDENTIAL STANDARDS

LTC SH1 LEWISHAM TOWN CENTRE

LTC SH4 IMPACT OF LEWISHAM GATEWAY ON SOUTHERN PART OF THE TOWN CENTRE

LTC URB1 TALL BUILDINGS IN LEWISHAM TOWN CENTRE

LTC URB2 SUSTAINABILITY

LTC URB3 HIGH QUALITY DESIGN

LTC OS1 RETENTION OF METROPOLITAN OPEN LAND

LTC OS2 WATERLINK WAY AND CELEBRATING THE RIVER CONFLUENCE

LTC OS3 ENHANCING OPEN SPACE AND BIODIVERSITY

LTC OS4 NATURE CONSERVATION

LTC TRS1 LEWISHAM TOWN CENTRE PARKING STANDARDS

LTC TRS5 TRAVEL PLANS

LTC ENV1 PROTECT AND ENHANCE THE ENVIRONS OF THE RIVERS

LTC ENV2 FLOOD PLAINS

LTC COM1 LEISURE CENTRE

LTC COM2 A NEW SECONDARY SCHOOL FOR THE TOWN CENTRE
LTC COM4 MAJOR DEVELOPMENTS
LTC IMP2 COMPULSORY PURCHASE ORDER POWERS
LTC IMP3 LEWISHAM TOWN CENTRE S106 POOLING AND PRIORITIES
LTC IMP4 PARTNERSHIP AND CONSULTATION
LTC IMP5 INFRASTRUCTURE AND SERVICES
LTC IMP6 TRANSPORT CAPACITY
LTC IMP7 EDUCATION AND TRAINING SCHEMES

4. SUB-AREA SPECIFIC POLICIES

4.1 Overview

As was the case in the Preferred Options report of 2007, a series of sub-areas have been identified in the town centre within which key sites and opportunities are identified and highlighted. These sub-areas have a diverse character and present significant opportunities to enhance the social, environmental and economic health of the town centre in line with London and national planning policy. These are now called 'character areas' rather than 'opportunity areas' and there has been some adjustment, with the previously proposed Engate Street area no longer being pursued and a new Ladywell Road area being added. These character areas provide a means to realise the vision and objectives of the AAP. Specifically, these areas include a number of development sites which could deliver new retail floorspace, homes and jobs as well as contributing to sustainable patterns of transport and creating a first class environment for the benefit of all who use the centre and rely on the essential services provided within it.

Policies and proposals are put forward for the following character areas and specific sites within them:

1. Gateway character area
2. Loampit Vale character area
3. Conington Road character area
4. Lee High Road character area
5. Ladywell Road character area
6. Central character area

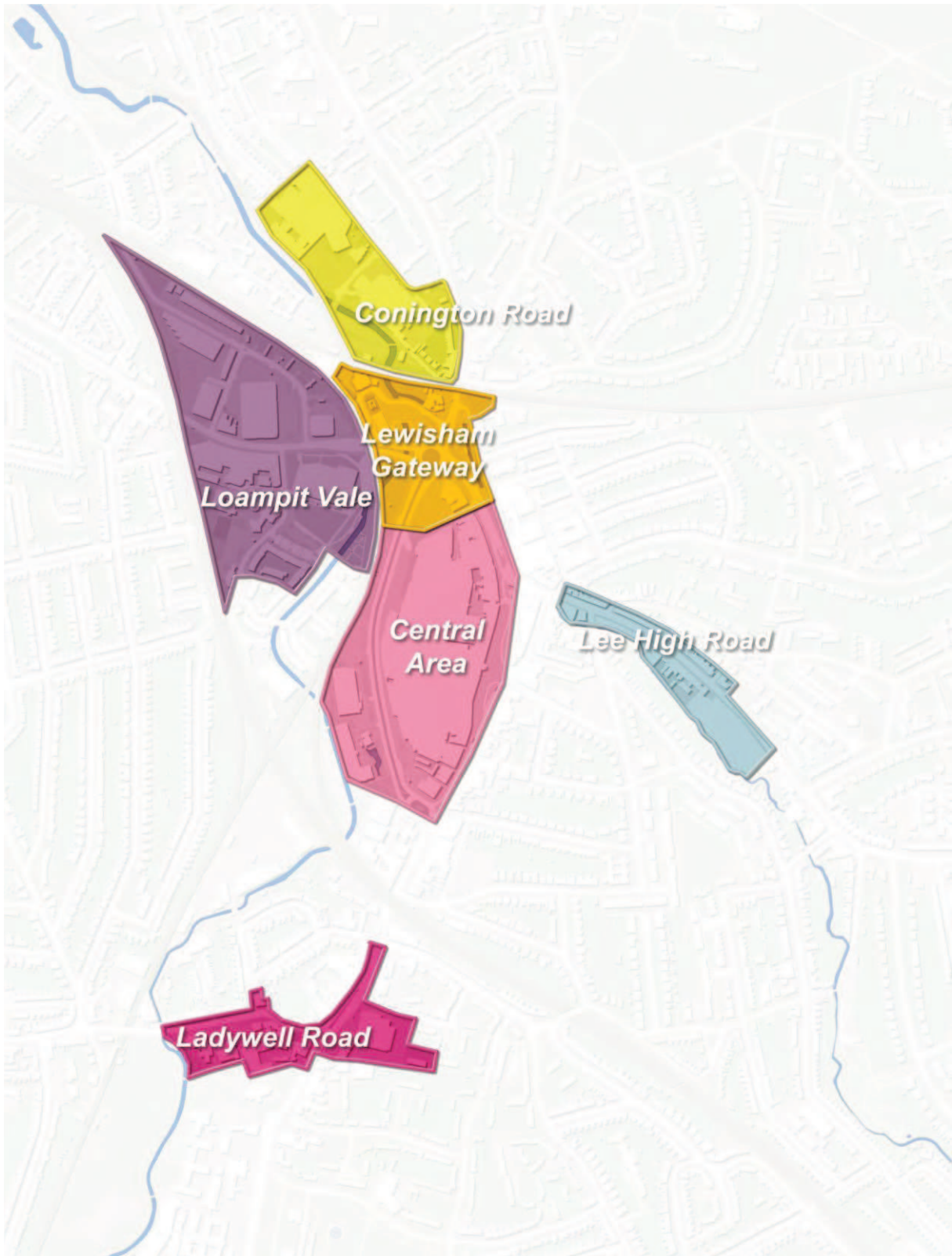


Figure 7: Character area key plan

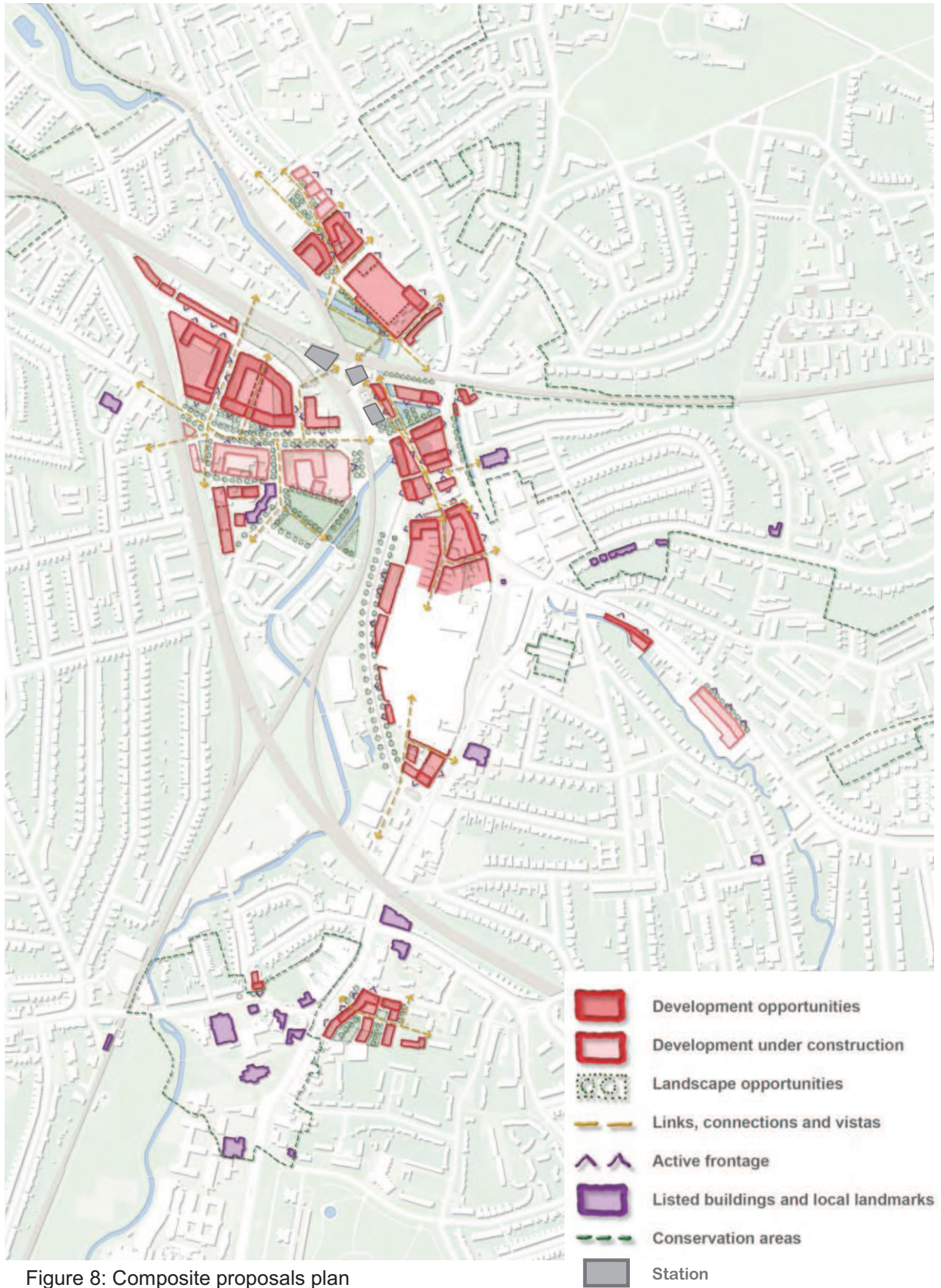


Figure 8: Composite proposals plan

4.2 Gateway character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Gateway character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene –preferred option

This character area is dominated by the northern roundabout, roads and open and cleared spaces that make up the Lewisham Gateway site. This site is identified in the Council's emerging Core Strategy as one of five strategic sites across the Borough under Spatial Policy 2 and Strategic Site Allocation 6.

A policy dealing specifically with the Gateway site is not therefore considered necessary or appropriate at this stage, although the footprint of the permitted scheme is shown on Figure 9. Lewisham Gateway's core objective of creating a more direct link between Lewisham Interchange and Lewisham High Street and the shopping centre presents a unique opportunity to radically improve the range and quality of the town's retail offer, the quality of the town centre environment and create the context for the wider regeneration of the town centre as a whole. It is this wider regenerative impact and effect that this AAP must articulate, promote and manage.

Development opportunities in the Lewisham Gateway character area have the following indicative capacity:

- 800 homes;
- 17,000 sqm net retail;
- 8,000 sqm office;
- 5,000 sqm hotel; and
- 5,000 sqm leisure.

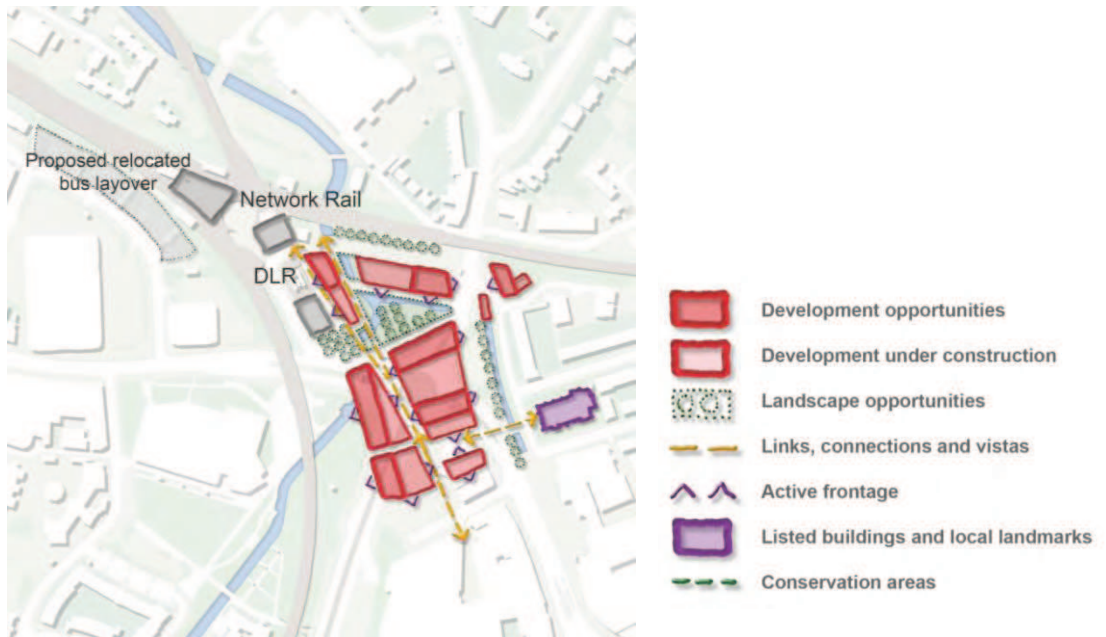


Figure 9: Lewisham Gateway character area

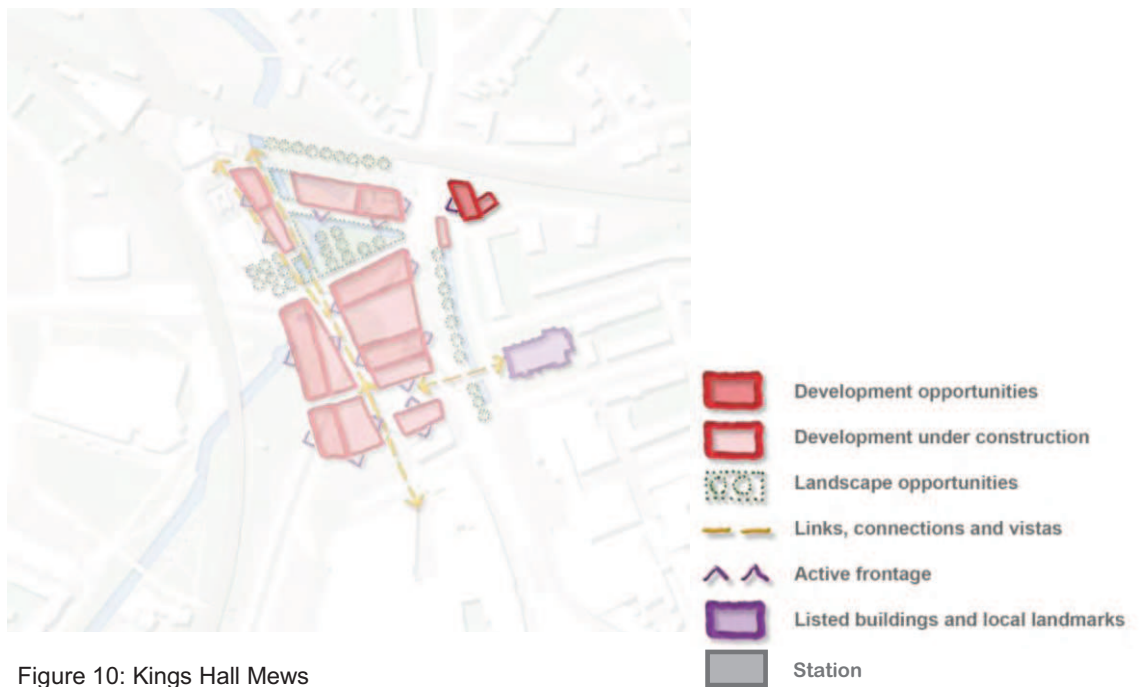


Figure 10: Kings Hall Mews

Although a draft policy statement is not therefore required for the Lewisham Gateway site, it is important to provide policy in relation to the Kings Hall Mews site to the east of the Strategic Site.

SITE SPECIFIC POLICY 1.1: Kings Hall Mews
[Extension of deleted policy LTC OPP1]

This site occupies an important location adjacent to the Lewisham Gateway site. Acceptable uses include Retail (A1 to A3), Business (B1) and a hotel (C1) and proposals will be expected to adhere to the following principles

- 1 Any proposals should be of the highest design quality and relate carefully to both the four storey Victorian terrace on Granville Grove, the St. Stephen's conservation area and proposals for the Lewisham Gateway site and provide active ground floor frontages to Kings Hall Mews and Lewisham High Street;
- 2 In the context of principle 1, proposals must be justified by a clearly articulated rationale for the proposed use(s), height, scale and massing; and
- 3 Proposals must conform to the highest quality design principles, in particular to overcome the site and environmental constraints.

The priorities for site-specific developers contributions associated with new development proposals on this site are public realm improvements to Kings Hall mews and Lewisham High Street.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The future of the Gateway site has undergone significant consultation, through the SRB programme and the preparation of a planning brief for the site.
- **Planning policies:** The emerging Core Strategy Strategic Site Allocation 6 established policy for the Gateway site. The proposed policy for Kings Hall mews conforms to guidance at the national, regional and local scale.
- **Wider policies:** The proposals conform to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The removal of the general and specific policies for the Lewisham Gateway scheme relates to the strategic allocation and guidance in the Core Strategy. As identified above, an additional policy has been prepared for the Kings Hall Mews site as this is immediately adjacent and therefore requires clear guidance to facilitate the delivery of a high quality scheme.

4.3 Loampit Vale character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Loampit Vale Character Area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

The Loampit Vale character area forms the principal approach to the town centre from the west. It has evolved as an edge of centre location where bulky goods retailers have tended to cluster but has more recently developed into a location of new town centre communities and high quality community facilities including a new public park, new leisure centre and new school.

The area benefits from excellent public transport accessibility given its proximity to Lewisham Interchange and there is a major opportunity to improve the pedestrian environment. A number of recent schemes have been granted planning permission since the publication of the Preferred Options 2007 report, including the following:

- **Thurston Industrial Estate** – a major mixed use scheme rising to a maximum of 17 storeys comprising 6,770sqm of non-food retail floorspace, over 400 dwellings, employment space together with associated on-site parking and landscaping.

- **Bus layover site** – a site adjacent to the railway line has been identified as part of the permitted Lewisham Gateway proposal for the relocation of bus layover space.
- **Land east and west of Elmira Street** - (also known as 'land south of Loampit Vale) – major mixed use development on land fronting Loampit Vale rising to a maximum of 24 storeys. Redevelopment will comprise a replacement public leisure centre, replacement City Mission, over 750 residential dwellings, some additional retail and business space and a small amount of publicly accessible open space opposite Thurston Road. The first phases of the development are currently under construction.
- **Lewisham Bridge Primary School** – a new Prendergast Vale through-school on the site of the existing Lewisham Bridge Primary School, integrating the listed original school building.

The principal aims and opportunities for the area are to attract major investment to deliver new homes, jobs and essential community facilities within a high quality environment immediately adjacent to and linked with Lewisham Gateway. There is a particular opportunity to improve the quality of the pedestrian environment along Loampit Vale through the provision of generous tree-lined pavements, ensuring that new buildings present an active edge to the street. The future redevelopment of the area is largely secured through the various recent planning permissions granted for key sites in the character area.

The preferred option remains a composite approach to the options outlined in 2005 which responded to a series of site specific options and more general design options.

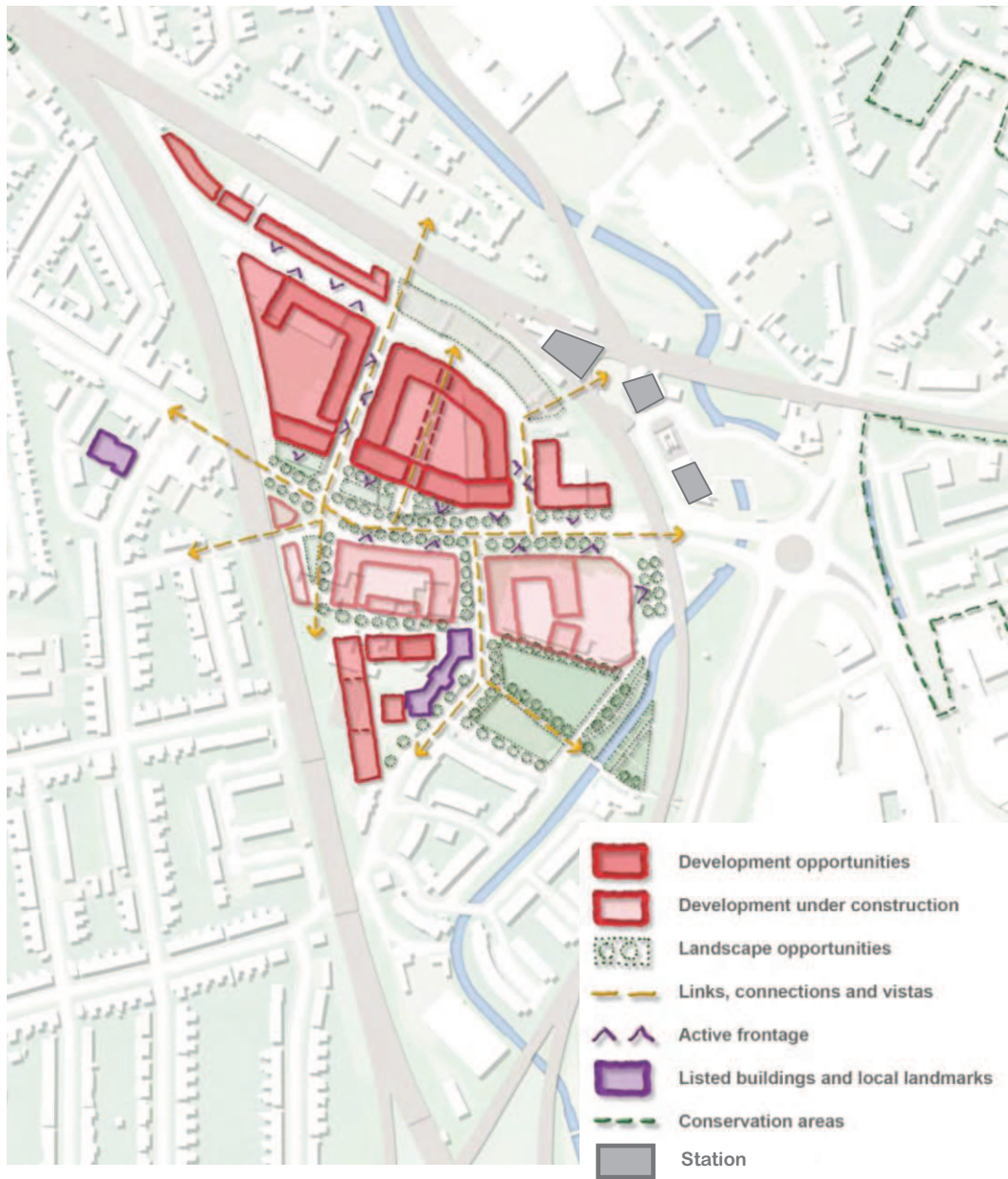


Figure 11: Loampit Vale character area

**CHARACTER AREA POLICY 2: Loampit Vale character area
[Amended version of preferred option draft policy LTC OPP4 and LTC OPP
4d]**

The Loampit Vale character area provides the western gateway to the town centre. The area has considerable capacity for urban growth and radical improvements in townscape quality.

The Loampit Vale character area has the following indicative capacity:

- 1,650 homes; and
- 13,100 sqm net retail.

New development should be coordinated to transform Loampit Vale into a wide, tree-lined urban boulevard. Key priorities for the area are as follows:

- 1 Radical improvement to the quality of the public realm in the area including pedestrian and cycle routes, facilitated by major new developments coming forward within the character area;
- 2 Major new mixed use development providing:
 - (a) residential units across a range of dwelling types and sizes in this highly sustainable location; and
 - (b) retail floor space appropriate to this location that complements rather than competes with the core town centre retail offer.

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Public realm improvements including Loampit Vale and Jerrard Street pavement widening and tree planting;
- b. Public transport improvements;
- c. Public access to any non-residential car parking;
- d. Communal heating; and
- e. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities).



Figure 12: Loampit Vale North – east of Jerrard Street

**SITE SPECIFIC POLICY 2.1: Loampit Vale North – east of Jerrard Street
[Amended version of preferred option draft policy LTC OPP4f]**

The land east of Jerrard Street is allocated for mixed use development that will complement the mixed use development of other sites in this Character area and in the Gateway character area.

The Council will require a comprehensive masterplan which is endorsed by landowners for the land east of Jerrard Street and its surrounds that delivers the following principles:

- 1 Creation of a strong defined built edge to Loampit Vale with new development providing activities and interest at the ground floor;
- 2 Creation of generous tree lined pavements with a coordinated approach to public realm material treatment (width of 6-8m);
- 3 Taller elements of new development should address Loampit Vale;
- 4 Improvement of north-south routes across the site and under the railway lines that link to the wider hinterland;
- 5 Enhance accessibility to Lewisham Station where possible;

- 6 Dedicated bus lane for turning from Loampit Vale into Jerrard Street which may require building lines to be set back to facilitate the necessary depth of pavement;
- 7 Jerrard Street and Thurston Road will take on more importance as new low car-parking schemes encourage walking and cycling and the quality and width of the footways require improvement; and
- 8 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.

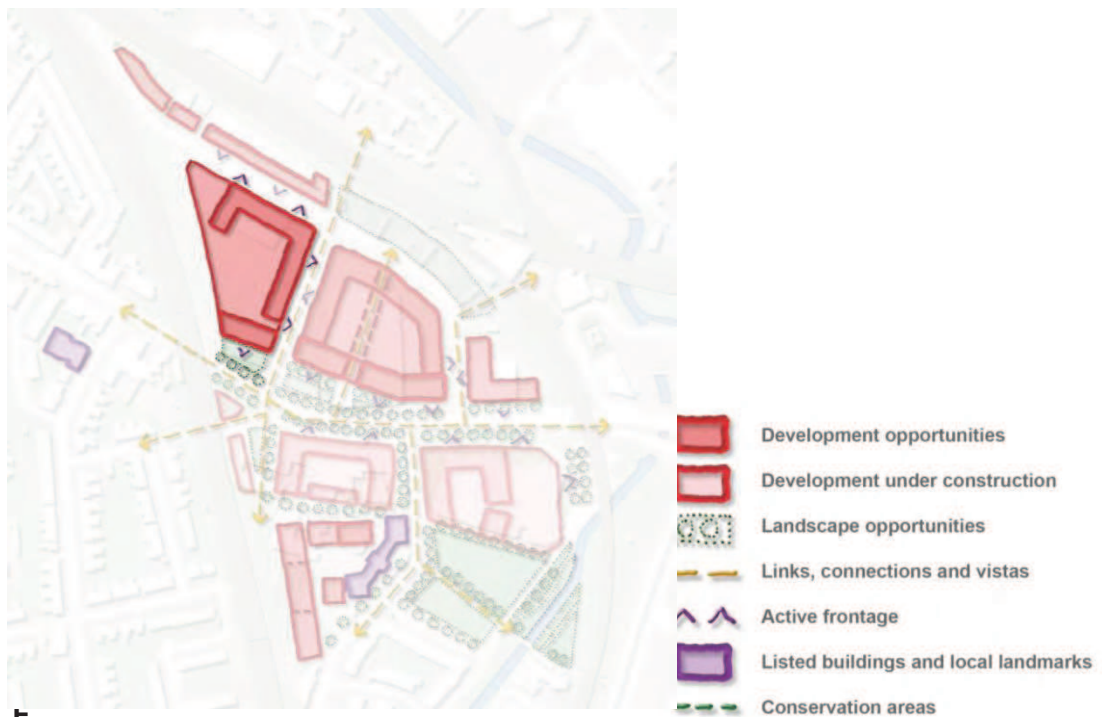


Figure 13: Loampit Vale North – west of Jerrard Street

**SITE SPECIFIC POLICY 2.2: Loampit Vale North – west of Jerrard Street
[Amended version of preferred option draft policy LTC OPP4e]**

The Thurston Industrial Estate is allocated for mixed use town centre development. The Council will encourage development of this prominent and important site.

Proposals should incorporate the following principles:

- 1 Create an active building frontage to Loampit Vale and Jerrard Street of a scale appropriate to this town centre location. New development should

prepare the visitor for the scale of the development they will encounter in the Lewisham Gateway to the west;

- 2 Ground and possibly first floor uses should ideally be retail, business and community spaces with flatted accommodation above, taking account of the southerly aspect available and the amenity provided by the new publicly accessible open space being created to the south of Loampit Vale;
- 3 The use and design of any new building needs to take account of the impact of shadows cast from buildings on the south side of Loampit Vale on this site and the microclimatic impact of any proposals on Thurston Road;
- 4 Support the improvement of the public realm adjoining the railway line and facing the Thurston Road Industrial Estate, in order to enhance amenity for residents on surrounding development sites;
- 5 Enhancement of public realm on Thurston Road;
- 6 Creation of generous tree lined pavements with a coordinated approach to public realm material treatment (width of 6-8m);
- 7 Jerrard Street and Thurston Road will take on more importance as new low car-parking schemes encourage walking and cycling and the quality and width of the footways require improvement; and
- 8 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.



Figure 14: Railway strip

POLICY 2.3: Railway strip

[Amended version of preferred option draft policy LTC OPP4g]

The railway strip site is allocated for a commercial-led mix of uses.

All proposals should incorporate the following principles:

- 1 Proposals for the land north of the existing Thurston Road Industrial Estate should relate to the geographic constraints presented by the narrow plot depth and location adjacent to the Victorian railway viaduct. This land is considered appropriate for commercial or mixed uses.
- 2 Proposals for the land parcels to the west, leading to the Brookmill Road do not contribute positively to townscape quality. The plots in this location are deeper and therefore have greater potential for a mix of uses. Flatted residential accommodation might be appropriate if the environmental issues associated with this location are satisfactorily mitigated.
- 3 Any proposals should seek to enhance the quality of the pedestrian environment to enhance the arrival experience for pedestrians travelling to

and from the town centre from the northwest. This highlights the need for active, non-residential uses at groundfloor.

- 4 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.
- 5 Any proposal or residential development on the site must overcome any environmental issues and the constraints of the site to provide a high quality of accommodation and amenity

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The principle of the designation of the Loampit Vale area as an sub-area was supported. There was no clear preferred option for the specific sites.
- **Planning policies:** The draft policies conform with national guidance and play a key role in realising strategic land use objectives in the emerging Core Strategy and the London Plan.
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The area-wide policy has been updated to reflect the recent flood risk assessment work and the energy strategy recommendations study. The scope of the site-specific policies has been updated to reflect progress in the implementation of key sites including the mixed use leisure scheme south of Loampit Vale.

4.4 Conington Road character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Conington Road character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

Conington Road is immediately to the north of Lewisham transport interchange and the planned Lewisham Gateway development. The area is dominated by a somewhat outdated but popular Tesco store and an associated fragmented series of surface car parks. This is a highly sustainable location with very good levels of public transport accessibility. The River Ravensbourne runs through the area in a concrete channel.

There are two sites that have been granted planning consent for redevelopment since the 2007 Preferred Options Report:

- 72 - 78 Conington Road – Where a part eight/part 10 storey building containing 270 homes and a limited amount of commercial floorspace has recently been built.
- The adjacent Venson site on Conington Road – separated from the above site by Silk Mills Path, a pedestrian right of way, 130 homes in buildings rising to a maximum of 8 storeys, again with some limited commercial uses on the ground floor. This is currently under construction.

In addition, Tescos are known to be keen to expand their store and improve the range of goods and services offered. The Preferred Options report highlighted a range of land use and design options which formed the basis of a composite preferred option incorporating the retention of employment uses, expansion of retail floorspace and introduction of residential uses.

The principal aims and opportunities for the character area relate to the opportunity for it to become more established as a sustainable urban neighbourhood to the north of the town centre focussed around the north south axis of Conington Road, Silk Mills Path and the River Ravensbourne. At the heart of this opportunity is the potential future development of the Tesco car park sites in conjunction with both the expansion of the store and retention of similar levels of car parking provision, retaining the ability of shoppers to park and make use of other shops and services in the town centre. There is an identified need for more convenience retail floor space in this part of the borough and therefore this expansion would assist in meeting that need.

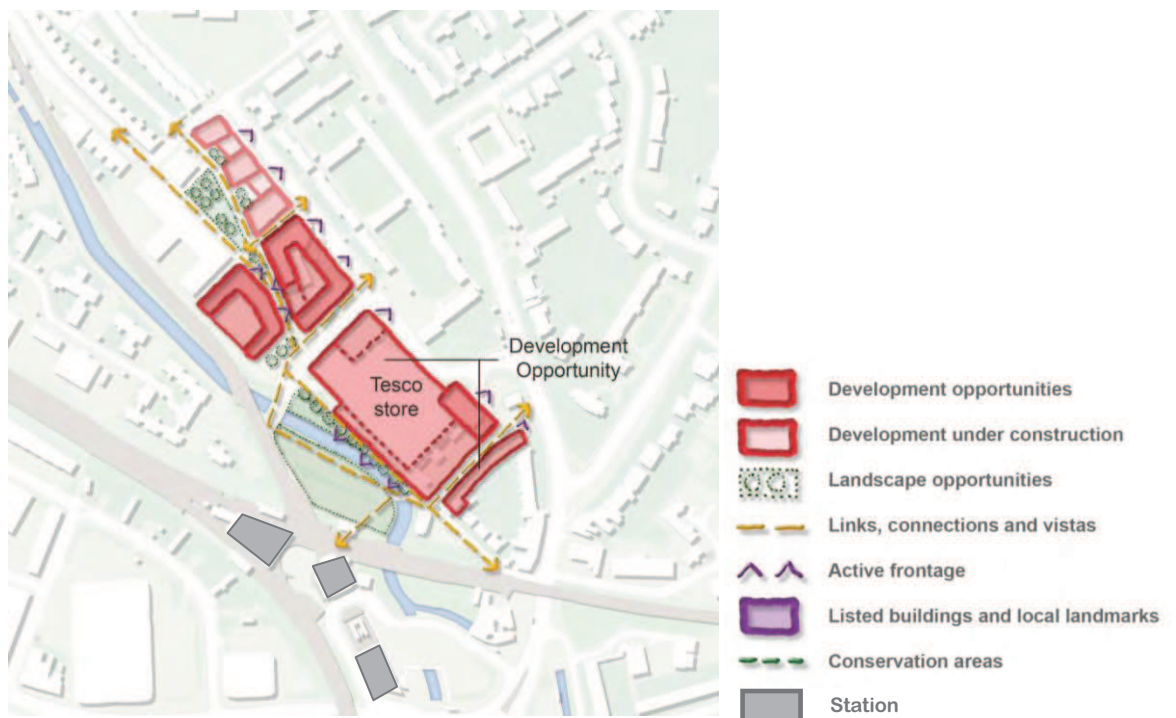


Figure 15: Conington Road character area

**CHARACTER AREA POLICY 3: Conington Road character area
[Amended version of preferred option draft policy LTC OPP5]**

The Conington Road character area provides the opportunity for the establishment of a new and compact town centre neighbourhood with improved links to the station interchange, Lewisham Gateway and the core town centre beyond. The area has considerable capacity for urban growth and radical improvements in townscape quality together with an expanded Tesco store.

Development opportunities in the Conington Road area have the following indicative capacity:

- 400 homes; and
- 3,000 sqm net retail.

New development should address the key routes of Conington Road, Silk Mills Path and the River Ravensbourne. Key priorities for the area are as follows:

- 1 To improve and create accessible pedestrian and cycle routes across the area to the Gateway site, Lewisham Station and the River Ravensbourne.
- 2 To enhance the ecological quality of river environment and ensure the river corridor is also improved to form a valuable public amenity, potentially as a riverside walk.
- 3 To support appropriate expansion of the Tesco store for additional convenience retail floorspace, so long as it does not prejudice the wider objectives for the Character Area as a whole.
- 4 To ensure the most sustainable use is made of the land available to support the further establishment of a new high quality residential neighbourhood in this sustainable location.
- 5 The scale and grain of existing historic fabric at the southern end of this area, its mix of uses and townscape character, are important assets of the town and should be retained and enhanced.

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Public realm improvements
- b. Naturalisation and improvements to the ecological quality of the river
- c. Provision of the publicly accessible pedestrian and cycle routes
- d. Improved access to Lewisham Station.
- e. Public access to non-residential car parking
- f. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)



Figure 16: Tesco block and car park

SPECIFIC POLICY 3.1: Tesco block and car park land
[Amended version of preferred option draft policy LTC OPP5 and LTC OPP5c]

The Tesco site and its car parks are allocated for mixed use development including an overall increase in the amount of convenience floorspace in line with identified capacity.

- 1 Access to the river, both visual and physical, from Conington Road should be improved.
- 2 Establishment of a new direct and publicly accessible pedestrian and cycle route linking Lewisham Road to the existing footbridge across the river, enabling new links to Lewisham Station and Gateway site.
- 3 Redevelopment/refurbishment of this site provides a valuable opportunity to improve the quality of frontages to Lewisham Road and the southern end of Silk Mills Path, which are currently poorly addressed by the existing development.
- 4 Parking could be provided beneath a redeveloped car park site, utilising the change in levels across the site. A multi storey parking structure on the island site adjacent to the railway line may help release other surface car park sites and ensure new parking spaces are closer to the store and may

be acceptable if of outstanding design and does not prejudice the creation of a secondary access to Lewisham Station.

- 5 Significant residential development could be accommodated on the existing surface car park site either side of and directly addressing Silk Mills Path and Conington Road.
- 6 The location of the existing Petrol Filling Station constrains the extent to which this highly accessible site can be transformed into a genuine urban mixed use quarter. The disparate urban form and highly trafficked nature of the filling station does not match the objective of enhancing the Silk Mills Path connection. In this context, the Council will seek to work closely with the developer to mitigate the impact of any filling station, ideally through its relocation off-site.
- 7 Proposals should seek to maintain the security and privacy of the existing properties south of Silk Mills Path.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Tesco confirmed their intention of expanding their retail offer alongside a wider mix of uses to regenerate the site.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The Conington Road area continues to be a key priority for Lewisham Town Centre. The northern part of the site has already come forward, but major opportunities still exist for the development of much needed housing in a way that helps stitch the area into the core of the town centre. The proposed policy has been updated to reflect recent engagement with Tesco.

4.5 Lee High Road character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Lee High Road character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

Lee High Road provides the principal approach to Lewisham Town Centre from the east. The road forms part of the A20 and is managed by TfL. The character area encompasses Lee High Road to its junction with Eastdown Park, along with the Albion Way car park and Marischal Road shopping parade. The nature of this area is distinct from that of the retail core of Lewisham, characterised by smaller retail units and independent specialist retailers. The area already constitutes a mixed and sustainable community, with some affordable housing located alongside more affluent residences. Lee High Road is a traditional high street with continuous and varied ground floor commercial uses, typically with several floors above.

The former Hartwell Ford car dealership site has remained vacant for some time. However, since the 2007 Preferred Options Report was published, planning permission has been granted on appeal for a new food store with housing above. This scheme is currently under construction.

The Preferred Options report identifies a series of site-based development options which were taken forward as a composite preferred option.

The principal aims and opportunities for the character area relate to the importance of respecting the strong traditional high street character of the area which is one of its key strengths and embracing the opportunity to respond positively to the River Quaggy. The Lee High Road area plays a complementary and secondary role to the commercial core of Lewisham with a good selection of specialist retailers in retail units typically smaller than those found on Lewisham High Street



Figure 17: Lee High Road character area

CHARACTER AREA POLICY 4: Lee High Road character area [Amended version of preferred option draft policy LTC OPP3]

Development opportunities in the Lee High Road Character area have the following indicative capacity:

- 110 homes; and
- 2,000sqm net retail

The Council has identified the following key principles for sites within the Lee High Road character area:

- 1 Protect and enhance the traditional high street character of Lee High Road;
- 2 Protect and enhance the biodiversity along the River Quaggy and its immediate environment and, where possible, improve visual and physical access to the river corridor in consultation with the Environment Agency and other relevant stakeholders;

- 3 Protect and enhance amenities of existing residents from and through new development; and
- 4 Improve the environmental quality of the area,

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Improvements to the channel and environs of the River Quaggy;
- b. Environmental improvements to Albion Road car park; and
- c. Physical/public realm Improvements to Lee High Road.

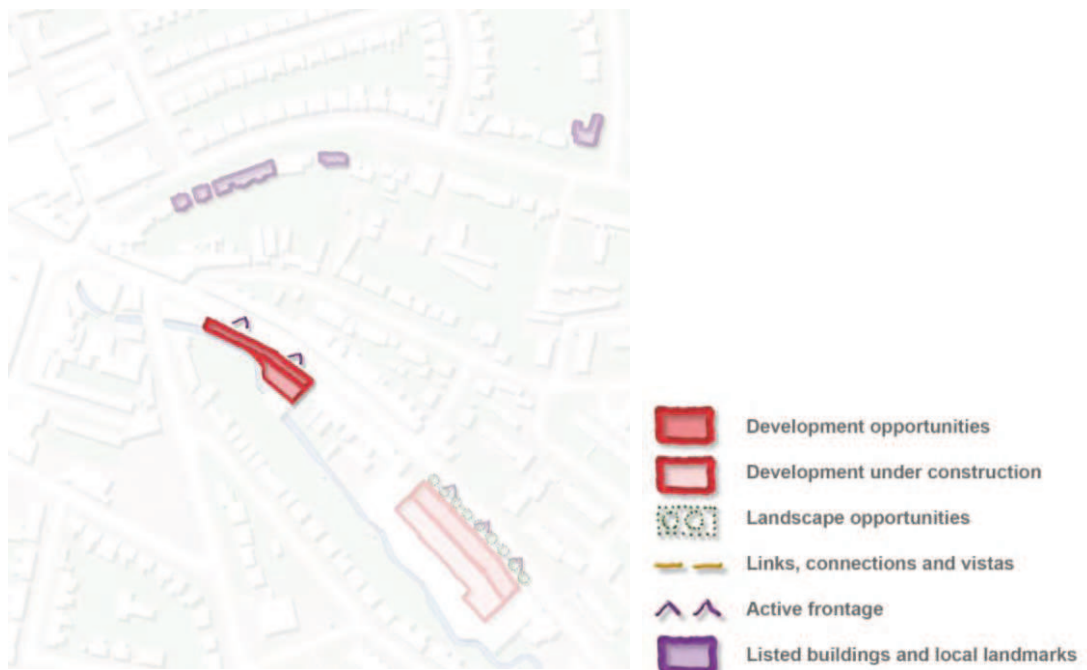


Figure 18: Lee High Road western end

SITE SPECIFIC POLICY 4.1: Lee High Road western end [Amended version of preferred option draft policy LTC OPP3a]

The Council will encourage development to contribute to the realisation of the following principles:

- 1 Protect and enhance the retail character of the area with respect to its focus for small independent retailers and evening economy uses;
- 2 Improve pedestrian and retail environment by pavement widening, improving formal crossing opportunities, tree planting and opening up better links to the River Quaggy;
- 3 Provide a high design quality to new and replacement shopfronts;

- 4 Redevelopment of the single storey shops to include small retail or food and drink units on the ground floor and residential or office uses above taking advantage where possible of opportunities to provide glimpse views of the river channel;
- 5 Heights of new development should respect and reflect the heights of surrounding development; and
- 6 Reinforce the positive relationship between the small stretches of cobbled street on the northern side of Lee High Road, including the western end of Marischal Road, to the busier Lee High Road.
- 7 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The designation of Lee High Road as an sub-area was supported.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Following commencement of construction on the former Hartwell Ford site, the policy for the eastern end of the site has been removed. The Clarendon Green policy statement has also been deleted in response to the deletion of the Engate Street multi-storey car park proposals and the revision of the town centre parking strategy. Scope still exists for the enhancement of the western end of Lee High Road and this policy statement has therefore been retained.

4.6 Ladywell Road character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Ladywell Road character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

The 'Lady Well' was a six foot deep well on a site close to Ladywell Bridge dedicated to the Virgin Mary which gave its name to this small settlement south of Lewisham. Indeed, Ladywell itself is thought to have been the birthplace of Lewisham town. Ladywell Road forms part of the local road network providing an important connection between Lewisham and Brockley. The south side of Ladywell Road hosts a collection of beautiful historic buildings including the Playtower (former Baths) which is on the Listed Buildings at Risk register. The Council is supporting efforts to bring new life to the building which may see it refurbished by a local community trust and brought back into community use. These historic buildings all fall within the St Mary's Conservation Area, taking its name from the ancient church which anchors this community hub.

The area is characterised by a historical concentration of civic and community facilities which, in addition to the church, includes the current and former fire station buildings, the soon to be replaced Ladywell leisure centre, the mortuary and coroner's court building and the former Vicarage of St. Marys building, which in dating back to the late 18th century is one of the Borough's oldest buildings.

Notwithstanding the Ladywell Road character area being located within the Lewisham Core Strategy 'Regeneration and Growth Area', it has a different nature to much of the town centre. The Council has undertaken a conservation area management plan for sections of the character area and as such it is in parts unsuited to wide scale growth. However, there are some key and important opportunities in the area that require consideration, in particular. The Ladywell

Leisure Centre will be surplus to requirements and brought forward for redevelopment once the new leisure centre opens on Loampit Vale.

Parts of the Ladywell character area, including the leisure centre site, form part of Lewisham's Low Carbon Zone. Lewisham is working in partnership with the Mayor of London, GLA and a range of public, private and community sector groups to deliver a reduction in CO2 emissions of 20% by 2012 and a 60% reduction by 2025

Options

The Lewisham Town Centre AAP will allocate the Ladywell Leisure Centre site for redevelopment. This site was not identified as a potential site allocation in the Preferred Options report of 2007 and therefore a range of options are considered through this Further Options report. The site will only be able to be redeveloped when the new replacement leisure centre on Loampit Vale is operational. There are a number of policy options to consider:

Options	Description	Issues
1. Food supermarket with residential uses above	Capacity for supermarket of approximately 2,800sqm net. Two or three floors of residential above. Parking would either be in basement or undercroft with a raised store. Principal customer entrance would be on Lewisham High Street.	Access to car parking would be a major issue. Use would generate considerable number of new trips which would need to be managed. Access to the car park would need to come off Longbridge Way for which at present there is no right turn into from Lewisham High Street (a TfL red route). Also, in terms of retail capacity, given that the AAP will be promoting expansion of food retail at Conington Road, this could be overprovision.
2. Redevelopment of the site for a mix of uses including retail and residential uses	The retail development would address Lewisham High Street with residential development above the shops and on the land to the rear. Given the edge of centre location of the site, food retail is considered likely to be more viable use. However, small units or a single unit of approximately 1,000 to 1,400sqm net in total is unlikely to be attractive to major retailers. Residential could be a mix of dwelling houses and flats or a denser scheme with a greater proportion of flatted accommodation.	The preferred option is to promote suitable town centre uses on this accessible site at a scale and format which is unlikely to give rise to significant traffic movements or prejudice the expansion of food retailing on more centrally located sites. It is a key opportunity to help support the vitality and viability of the southern part of the town centre. The preferred option promotes retail and residential uses but seeks to retain some flexibility as more detailed design and feasibility work is required.

Options	Description	Issues
3. Gypsy and Travellers site	Whilst planning permission was granted for the use of the nearby former Watergate School site for accommodation for gypsies and travellers, this permission was never implemented.	<p>Core Strategy Policy 2 deals specifically with identifying sites for gypsies and travellers and confirms that the Council continues to monitor their specific needs and will identify a site through the Site Allocations DPD.</p> <p>This site satisfies the selection criteria used by the Council in its search for a Gypsy and Traveller site to meet the anticipated requirements of the Draft Replacement London Plan and is one of seven shortlisted sites in the borough.</p> <p>Further consultation on shortlisted sites is expected in April-May 2011 and if considered appropriate, part of the Ladywell Leisure Centre site could be allocated for such a use through the AAP.</p>

Consultation

The Council received a number of responses relating to the closure of Ladywell Leisure Centre during the Preferred Options consultation.

Preferred option

The preferred option is to promote suitable town centre uses on this accessible site. It is a key opportunity to help support the vitality and viability of the southern part of the town centre. The preferred option promotes retail and residential uses but seeks to retain some flexibility as more detailed design and feasibility work is required.



Figure 19: Ladywell Road character area

Draft policies

CHARACTER AREA POLICY 5: Ladywell Road character area [NEW POLICY]

Development opportunities in the Ladywell Road Character area have the following indicative capacity:

- 150 homes; and
- 1,400sqm net retail (focused on the Ladywell Leisure Centre site)

The Council has identified the following key principles within the Ladywell Road character area:

- 1 Conserve and enhance the heritage assets in the area through sensitive development and environmental improvement.
- 2 Support efforts to bring the Ladywell Baths (Playtower) site back into use

so the building can once again play a key role in community life.

- 3 Promote the Ladywell Leisure Centre site for redevelopment for an appropriate mix of uses including retail and residential.
- 4 Promote development that contributes to the Lewisham Low Carbon Zone target to reduce CO2 emissions of 20% by 2012 and a 60% reduction by 2025

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Investing in the Waterlink Way initiative.
- b. Ensuring the heritage assets contribute positively to community life.
- c. Highway improvements particularly by the Ladywell Leisure Centre site.
- d. Support delivery of the Low Carbon Zone CO2 reduction targets
- e. Public access to non-residential car parking



Figure 20: Ladywell Leisure Centre site

SITE SPECIFIC POLICY 5.1: Ladywell Leisure Centre site [NEW POLICY]

The Council will seek to bring forward a comprehensive development of this site and adjoining land where appropriate for a mix of uses including retail (A1-A3) and housing (C3).

The following key principles will apply:

- 1 New development should seek to improve vehicular servicing of adjoining land to the south.
- 2 Proposals could include the redevelopment of Lewisham Free School, subject to the allowance being made for alternative provision of equivalent benefit to the community (see LTC COM3).
- 3 Proposals should seek to enhance the Lewisham High Street frontage through the incorporation of active uses at groundfloor and enhancements to the public realm in front of the site and enhancements to permeability through the site. Residential units should be situated at upper levels and to the rear of the site with associated amenity space provision.
- 4 Opportunities to establish a site-specific communal energy system with potential to link into a larger Lewisham Hospital decentralised energy system in the longer term will be encouraged.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** As a new sub-area, there has not been previous consultation regarding the Leisure Centre site as a development site.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy .
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

4.7 Central character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Central character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

Lewisham Central Character Area is dominated by Lewisham Shopping Centre which is owned and managed by Land Securities. The shopping centre contains a very significant proportion of the total retail floorspace in the town centre. The centre also has an 800 space pay and display car park.

Within this Character Area there are a number of additional sites. At the northern end of the centre there is a small site occupied by independent traders. The site is beyond the control of the shopping centre owners. Similarly, there is a collection of relatively small sites at the southern end of the shopping centre. Whilst Land Securities have acquired the Model Market site, the former Beatties buildings

beyond remains beyond their control.

Engate Street is a short street connected to the southern end of Molesworth Street. It is home to some established employment uses and was put forward in the Preferred Options report of 2007 as a potential site for the development of a multi-storey car park. This suggestion attracted objection from existing businesses along Engage Street and the GLA on the grounds of loss of employment floorspace.

Taking account of objections made to the Preferred Options Report, Engate Street is not identified as an allocated site although proposals would be welcome for more intensive employment uses on this well positioned site.

The Preferred Options report identified three main options for the shopping centre ranging from support for the existing function of the centre to comprehensive redevelopment or development of land to the south of the centre to create a new southern anchor. The preferred option was a composite of all three options.



Figure 21: Central area character area

**CHARACTER AREA POLICY 6: Central area character area
[Amended version of preferred option draft policy LTC OPP2 and LTC OPP6]**

Development opportunities in the Central Character Area have the following indicative capacity:

- 200 homes; and
- 600sqm net retail

The Council has identified the following key principles within the Central area character area:

- 1 As the centre is managed, refurbished and redeveloped over time, ensure every opportunity is taken to improve the number and nature of the east-west connections across the shopping centre area;
- 2 Create a new southern anchor for Lewisham High Street to encourage customers to travel the full length of the High Street;
- 3 Create a more coherent and pleasant environment which meets the needs of both pedestrians and vehicles, including possibly replacing the current

roundabout arrangement with a signified junction (subject to satisfactory traffic modelling and design development) and maintaining and where possible enhancing the existing Shopmobility scheme;

- 4 Achieve a welcoming and accessible gateway to the centre at the northern (interface with Lewisham Gateway) and southern entrances to the centre through high quality architecture and urban design;
- 5 Secure investment in the Waterlink Way concept along the alignment of the River Ravensbourne;
- 6 Create an active frontage to Molesworth Street; and
- 7 Working in partnership with market traders, achieve environmental improvements to Lewisham High Street and market area.

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Secure contributions to investment in the Waterlink Way initiative;
- b. Secure long term improvements to the Lewisham street market; and
- c. Secure environmental improvements to the pedestrianised areas of Lewisham High Street and the Molesworth Street corridor including improved pedestrian crossings and landscaping measures.
- d. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)



Figure 22: Land north east of the shopping centre

**SITE SPECIFIC POLICY 6.1: Land north east of the shopping centre
[Amended version of preferred option draft policy LTC OPP2g]**

The Council will encourage redevelopment of the corner site north east of the shopping centre in conjunction with more comprehensive improvements to the Lewisham Centre to provide retail (A1-A3) and/or leisure use (D2) on the ground floor with commercial and/or residential (C3) on the upper floors. Such redevelopment should take account of the following principles:

- 1 Redevelopment should respond positively to the Lewisham Gateway development and tall buildings may be considered appropriate subject to Core Strategy Policy 18;
- 2 Forming the northern end of the core shopping area, any redevelopment should seek to retain commercial uses at ground floor level on Lewisham High Street;
- 3 Active frontages should be provided at ground floor level to Lewisham High Street, the new connection road between Lewisham High Street and Molesworth Street and the new entrance mall to the shopping centre; and
- 4 New residential development should not require new dedicated car parking spaces, making wheelchair accessible housing here inappropriate.
- 5 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.



Figure 23: Land south of the shopping centre

SITE SPECIFIC POLICY 6.2: Land south of the shopping centre [Amended version of preferred option draft policy LTC OPP2f]

The Council will encourage the comprehensive redevelopment of the Beatties Buildings and Model Market sites to provide retail or leisure uses on the ground floor with commercial and/or residential uses on the upper floors. Such redevelopment should take account of the following principles:

- 1 Redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre and may take the form of an extension to the shopping centre.
- 2 Buildings should make best use of the corner site and provide enclosure and active frontage to both Molesworth Street and Lewisham High Street as positive public spaces.
- 3 New residential development should not require new dedicated car parking spaces making wheelchair accessible housing here inappropriate.
- 4 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.

**SITE SPECIFIC POLICY 6.3: Citibank Tower
[Retention of preferred option draft policy LTC OPP2i]**

Citibank Tower is an important landmark for Lewisham and an anchor for commercial life; however its appearance does not fulfil its potential in this respect. Proposals which include the recladding or redevelopment of the tower will be encouraged in order to enhance the character and identity of Molesworth Street and the wider town centre. More intensive office use or residential conversion would be favourably considered by the Council.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Consultees supported the principle of establishing the Centre as an Opportunity Area but did not identify a preferred option.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy.
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The decision not to pursue proposals for a multi-storey car park on the Engate Street site (for the reasons outlined above and in relation to the area-wide Policy LTC TRS2) means that the existing public car park on the west side of Molesworth Street is more important and the Molesworth Street site is no longer identified for development.

4.8 Policies which have been deleted

The following policies have been identified for removal from the emerging AAP. Appendix 3 details the rationale for this and identifies the documents that include relevant policies that satisfactorily address Lewisham Town Centre issues.

Please consider the key consultation questions set out in section 1.3 in relation to each of the removed policy options set out in section 4.8. In particular, we would ask you to regard the following matters:

- Do you have any comments on the removed policy options (See Appendix 3 for detail of removed policies)?
- Do you have any other comments?

The following policies have been identified for removal from the emerging AAP. Appendix 3 details the rationale for this and where relevant identifies where alternative policies exist.

LTC OPP0	OPPORTUNITY AREA POLICIES
LTC OPP1	LEWISHAM GATEWAY OPPORTUNITY AREA
LTC OPP1A	GENERAL PRINCIPLES FOR LEWISHAM GATEWAY
LTC OPP2A	ENTRANCE AND ROUTES
LTC OPP2B	URBAN FORM
LTC OPP2C	PUBLIC REALM
LTC OPP2D	VEHICULAR SERVICING AND PARKING
LTC OPP2E	MOLESWORTH STREET FRONTAGE
LTC OPP2H	MOLESWORTH STREET SURFACE CAR PARK SITE
LTC OPP2J	LEWISHAM HIGH STREET AND MARKET
LTC OPP3B	LEE HIGH ROAD EASTERN END
LTC OPP3C	CLARENDON GREEN
LTC OPP4A	LOAMPIT VALE SOUTH – A MIXED USE URBAN STREET
LTC OPP4B	EAST SIDE OF ELMIRA STREET
LTC OPP4C	WEST OF ELMIRA STREET
LTC OPP4D	THURSTON ROAD OPPORTUNITY
LTC OPP4F	LAND EAST OF JERRARD STREET
LTC OPP5A	NORTHERN LINK
LTC OPP5C	CAR PARK AND PETROL STATION
LTC OPP6	ENGATE STREET
LTC OPP6A	ENGATE STREET MIXED USE BLOCK

Appendix 1

Glossary of terms

Affordable Housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices
- include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision (Annex B PPS3).

Annual Monitoring Report A report submitted to the Government by local authorities or regional planning bodies assessing progress with and the effectiveness of a Local Development Framework.

Area Action Plan (AAP) A type of Development Plan Document focused on a specific location of an area subject to conservation or major change (for example major regeneration).

Biodiversity Biodiversity is the variety of life, which includes mammals, birds, fish, reptiles, amphibians, invertebrates, fungi and plants and the woodlands, grasslands, rivers and seas on which they all depend including the underlying geology.

Code for Sustainable Homes A national standard for sustainable design and construction of new homes which became mandatory on 1 May 2008. The Code measures the sustainability of a new home against categories of sustainable design using a 1 to 6 rating system to communicate the overall sustainability performance of a new home. The Code sets minimum standards for energy and water use at each level. Go to www.communities.gov.uk/thecode to find out more.

Comparison Retailing The provision of items not obtained frequently. These include clothing, footwear, household and recreational goods.

Conservation Area Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.

Contribution Land, services, facilities and/or money given by developers of land to the local authority following negotiations, to ensure that the needs of new communities generated by the development are catered for.

Convenience Retailing Convenience retailing is the provision of everyday items, including food, drinks, newspapers/magazines and confectionery.

Core Strategy A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for the area, in line with the Sustainable Community Strategy.

Creative Industries Creative industries has been defined by the Department for Culture, Media and Sport as 'Those industries that are based on individual creativity, skill and talent. They are also those that have the potential to create wealth and jobs through developing intellectual property. The creative industries include: Advertising, Film and video, Architecture, Music, Art and antiques, Performing arts, Computer and video games, Publishing, Crafts, Software Design, Television and radio, Designer fashion .

Department for Communities and Local Government (DCLG) The government department responsible for setting UK policy on local government, housing, urban regeneration, planning and fire and rescue.

Development 'The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material changes in the use of any building or other land' (Town and Country Planning Act (1990) Part III Section 55).

Development Plan Document (DPD) A Local Development Document that has been subject to independent testing and has the weight of development plan status. Replaces the Local Plans system.

Equalities Impact Assessment (EQIA) Equality Impact Assessments are concerned with anticipating and identifying the equality consequences of particular policy initiatives and service delivery and ensuring that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures.

Evidence Base The data and information about the current state of Lewisham used to inform the preparation of Local Development Framework documents.

Flood Risk Assessment An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

Government Office for London (GOL) The integrated Government Regional Office for London, with the following directorates: Education, Industry and Trade, Environment and Transport, and Strategy and Resources.

Gypsy and Traveller Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people or circus people travelling together as such (Circular 01/2006).

Housing Need A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy.

Independent Examination The process by which a planning inspector may publicly examine a Development Plan Document or a Statement of Community Involvement, before issuing a binding report. The findings set out in the report are binding on the local authority.

Infill Development Development that takes place between existing groups of buildings, normally within a built-up area.

Infrastructure The utilities, transport and other communication facilities and community facilities required to support housing, industrial and commercial activity, schools, shopping centres and other community and public transport services.

Intermediate Affordable Housing Subsidised housing that costs less than housing available for sale or rent in the open market (whichever is the lower) but more than housing for social rent. It includes part-buy part-rent homes and housing for rent or sale at a discount.

Issues and Options and Preferred Options The 'pre-submission' consultation stages on Development Plan Documents with the objective of gaining public consensus on proposals ahead of submission to Government for independent examination.

Listed Building Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.

Local Development Document (LDD) Sits within the LDF portfolio and comprise Development Plan Documents (DPDs) that have been subject to independent testing and have the weight of development plan status and Supplementary Planning Documents (SPDs) which are not subject to independent testing and do not have development plan status.

Local Development Framework (LDF) The Local Development Framework is a portfolio, or a 'folder', of Local Development Documents which will provide the local planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development and use of land.

Local Development Scheme (LDS) A public statement identifying which Local Development Documents will be produced by the Council and when.

Local Employment Location (LEL) Land that is of local significance and provide goods and services for the local economy, which is used for business use, industrial use, storage and distribution uses, generally being those uses falling within Classes B1, B2 and B8 of the Use Class Order.

Local Strategic Partnership A Local Strategic Partnership is a single non-statutory, multi-agency body which matches local authority boundaries and aims to bring together at a local level the different parts of the public, private, community and voluntary sectors.

Masterplan A document which sets out proposals for buildings, spaces, movement strategy and land use in text and three dimensions and matches these proposals to a delivery strategy. The masterplan can be described as a sophisticated 'model' that:

- shows how the streets, squares and open spaces of a neighbourhood are to be connected
- defines the heights, massing and bulk of buildings
- sets out suggested relationships between buildings and public spaces
- determines the distribution of activities/uses that will be allowed
- identifies the network of movement patterns for people moving by foot, cycle, car or public transport, service and refuse vehicles
- sets out the basis for provision of other infrastructure elements such as utilities
- relates physical form to the socio-economic and cultural context and stakeholder interests
- allows an understanding of how well a new, urban neighbourhood is integrated with the surrounding urban context and natural environment.

Planning and Compulsory Purchase Act 2004 National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it. Visit www.communities.gov.uk to find out more.

Planning Policy Statement (PPS)/Planning Policy Guidance (PPG) Planning Policy Statements (PPSs) (and their predecessors Planning Policy Guidance Notes) are prepared by the Government after public consultation to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning

system. They also explain the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.

Previously Developed Land Land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously developed land may occur in both built-up and rural settings. The definition includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures.

Regeneration The process of putting new life back into often derelict older urban areas through environmental improvements, comprehensive development and transport proposals.

Section 106 (S106) Section 106 of the Town and Country Planning Act 1990 allows a local planning authority (LPA) to enter into a legally binding agreement or planning obligations, with a land developer over a related issue. The obligation is sometimes termed a 'Section 106 agreement'. Such agreements can cover almost any relevant issue and can include sums of money. An example of S106 agreements could be that a developer will build a community meeting place on a development site, or the developer will make a financial contribution for transport improvements.

S106 agreements can act as a main instrument for placing restrictions on developers, often requiring them to minimise the impact on the local community and to carry out tasks which will provide community benefits.

Sequential approach/sequential test A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.

Social Rented Housing Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant (Annex B PPS3).

Spatial Planning Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. They will include policies which can impact on land use, for example by influencing the demands on, or need for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

Stakeholder A person, group, company, association, etc. with an economic, professional or community interest in the borough or a specific part of it, or that is affected by local developments.

Statement of Community Involvement (SCI) The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.

Strategic Environmental Appraisal (SEA) A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes.

Strategic Flood Risk Assessment (SFRA) An assessment usually undertaken by a local authority at a borough-wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with Planning Policy Statement 25.

Strategic Housing Land Availability Assessment (SHLAA) A study aimed at identifying sites with potential for housing, assessing their housing potential and assessing when they are likely to be developed.

Strategic Housing Market Assessment (SHMA) A study aimed at assessing the need and demand for housing within a housing market area.

Sustainability Appraisal (SA) Sustainability Appraisal is a systematic and iterative appraisal process, incorporating the requirements of the European Strategic Environmental Assessment Directive. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process.

Sustainable Community Strategy (SCS) The Sustainable Community Strategy has been prepared by Lewisham's Local Strategic Partnership and is a document which sets out how the vision and priorities for Lewisham will be achieved. The Core Strategy is the spatial interpretation of the SCS.

Sustainable Drainage Systems (SUDS) Physical structures designed to receive surface water runoff in order to reduce the negative impact of development on the water environment. They can usually be incorporated into the planted or paved area of the development.

Waste Material is waste if, when disposing of it or having it disposed of on his behalf, the producer intends to discard it or throw it away. Even if the material is reusable, if it is discarded it is still waste. It is the original producer's intention that determines if a material is waste. Waste is generally referred to as being either controlled or uncontrolled. Controlled waste consists of household, commercial and industrial waste and falls within the scope of waste regulation and environmental protection legislation. Uncontrolled waste consists of radioactive waste, explosive waste, mines and quarries waste and agricultural waste and is regulated by other legislation.

Appendix 2

Preferred Options consultation responses

Organisation	Policy	Comment	Response
1. Greater London Authority	GENERAL	The draft Development Plan Documents are largely supported. Lewisham town centre AAP is particularly successful at embracing the spatial approach to policy making which underpins the new planning system. A number of strategic issues are raised in the AAPs, particularly the borough wide affordable housing target, and the relaxed approach taken to employment land. It is acknowledged that GLA officers and the Council are in discussions regarding these issues, and it is hoped that a successful resolution can be reached. In addition, concern is raised regarding the need to secure decentralised energy at the town centre level.	The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations.
2. Greater London Authority	LTC EMP1	The LDA objects to the relaxed approach to employment land and seeks a more restrictive policy response. The requirement to deliver employment and training initiatives is supported, however this should be expanded to include methods to overcome barriers to work, for example childcare.	Core Strategy Spatial Policy 2 identifies the Molesworth Local Employment Location to help ensure local employment opportunities and this is reflected in the Further Options Report. Earlier proposals to develop parts of Engate Street for non business proposals have been dropped. Proposed Policy LTC EMP1 has been amended to provide further protection to employment uses and childcare provision is addressed in the Social Infrastructure options and draft policy.
3. Greater London Authority	GENERAL	Overall TfL considers both AAPs to be extremely positive in transport terms. Both AAPs seek to encourage more sustainable forms of transport, particularly walking and cycling. Car parking standards conform with the London Plan and the documents show that joint working exists between the borough and TfL, which is welcomed. The documents would benefit from some minor changes where references could be made to TfL's cycling and walking plans as well as TfL's Best Practice Guidance on Transport Assessments. TfL will continue to work with the borough to assist in delivering the transport improvements necessary to meet the identified development and regeneration needs. TfL expects the borough to maximise car free developments and seek Section 106 contributions to mitigate their impacts upon the public transport network.	Previously proposed Policies LTC TRS1 (Parking Standards) and TRS5 (Travel Plans) have been deleted, in preference to wider ranging policies in the Core Strategy. All the issues raised are addressed in the Core Strategy.
4. Greater London Authority	GENERAL	Both AAPs need to promote children's play areas within the town centres, particularly in areas of new residential developments, but also in public realm improvements in general.	The need for play space is addressed on a borough-wide basis in the Core Strategy. There are no town centre specific issues that warrant special attention in the AAP.
5. Greater London Authority	LTC URB6	Neither AAPs is proactive enough in promoting inclusive design of both individual developments and in public realm improvements. When establishing urban design criteria, as both AAPs do, it is vital that the need to ensure equal access for all is included. In addition, neither AAP supports a shopmobility scheme for the town centres. This is a vital facility, which should be secured through development, for example through s.106 agreements.	The need for inclusive design principles to be addressed is raised as a specific issue in the Further Options Report. New Character Area Policy 6 refers to the need to maintain and where possible enhance the existing shopmobility scheme. The design of public realm areas is addressed in the Core Strategy.
6. Greater London Authority	LTC OS1	Lewisham AAP takes an overly relaxed approach to Metropolitan Open Land, which causes serious strategic concern. Similar concerns were raised previously by the Mayor when considering the Core Strategy and Development Policies Preferred Options.	The previously proposed policy on MOL (LTC OS1) has been deleted in favour of the Borough-wide Core Strategy Policy 12 (Open space and environmental assets).
7. CABE	LTC URB3	Thank you for consulting the Commission for Architecture and the Built	The Further Options Report takes account of these comments.

Organisation	Policy	Comment	Response
		<p>Environment (CABE). Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider. 1.Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time. 2.Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales. 3.To take aspiration to implementation, local planning authorities' officers and members should champion good design. 4.Treat design as a cross-cutting issue - consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm. 5.Design should reflect understanding of local context, character and aspirations. 6.You should include adequate warding or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes. You might also find the following CABE Guidance helpful. •"Making design policy work: How to deliver good design through your local development framework" •"Protecting Design Quality in Planning" •"Design at a glance: A quick reference wall chart guide to national design policy" These, and other publications, are available from our website www.cabe.org.uk</p>	
Greater London Authority	GENERAL	<p>The Calford AAP explicitly requires that all residential development be built to Lifetime Homes standards, and that 10% be wheelchair accessible, or easily adaptable. Lewisham AAP does not include this requirement. It is acknowledged that the Development Policies DPD includes the requirement for Lifetime Homes and wheelchair homes, in accordance with London Plan Policy, however this differing approach may cause confusion. This issue is also raised with regard to renewable energy and sustainability. The GLA would welcome further discussion with the Council regarding this issue.</p>	<p>The need for accessible housing is raised as a specific issue in the Further Options Report. However, in line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy.</p>
Greater London Authority	LTC EMP1	<p>Lewisham AAP in particular takes a very flexible approach to the loss of employment land. This raises strategic concern. Town centres should include a full range of uses, and not be promoted on a retail offer alone. Poor architectural quality is not considered adequate justification to seek redevelopment of employment land for retail and residential uses. As such, the Council should take a more restrictive approach and seek environmental and streetscape improvements through other means than complete redevelopment.</p>	<p>Core Strategy Spatial Policy 2 identifies a Molesworth Local Employment Location to help ensure local employment opportunities and this is reflected in the Further Options Report. Proposed Policy LTC EMP1 has been amended to provide further protection to employment uses.</p>
Greater London Authority	LTC HSG4	<p>Both AAPs mirror the Development Policies approach to affordable housing, and include a 35% affordable housing target. As stated by the Mayor previously this approach is not supported and is considered not in general conformity. It is acknowledged however that discussions are ongoing between GLA officers and the Council regarding this matter, and it is hoped that a successful conclusion can be met.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.</p>

Organisation	Policy	Comment	Response
11. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC OPP5	The illustrative 'development framework plan' is overly prescriptive in terms of the layout and urban form of the development blocks. The plan should not prejudice the ability of any future developer to bring forward schemes with alternative layouts that still adhere to best practice urban design principles.	The plan is "indicative" but represents good urban design principles. It is not intended to stifle good design and the Council would welcome positive discussions with developers on key town centre sites.
12. Greater London Authority	LTC URB2	On balance, the sustainability, and particularly the energy policies, within the Development Policies document are supported. These are repeated in the Catford AAP. However neither AAP address the need to actively promote and secure district heating at the town centre level, led by combined heat and power to serve proposed and existing developments. This is a key component of the draft Further Alterations to the London Plan, as amended by documents submitted to the recent Examination in Public. The AAP documents are the appropriate method with which to establish policy support for this approach. The current documents therefore raise serious strategic concern in this regard and GLA officers would be keen to follow this up in detail with Lewisham Council.	The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations.
13. Greater London Authority	GENERAL	Both Area Action Plans (AAPs) are supported in principle. Lewisham Town Centre AAP is a particularly successful response to the new planning systems promotion of spatial planning. The two documents are however very different in style and content, which may create an awkward family of documents when finished. The Catford Town Centre AAP is largely policy based, with detailed policies on housing and sustainability, for example, which in some respects mirrors the Development Policies and Core Strategy policies. However, Lewisham AAP takes a design led approach, and does not include the same policy detail. Both documents are largely successful, but it may be beneficial to introduce some standardisation across the pair.	LBL are currently reviewing the structure of both AAPs to ensure consistency between them and with the emerging Core Strategy
14. Highways Agency	GENERAL	1.Thank you for inviting the Highways Agency (HA) to comment on Lewisham's Local Development Framework Preferred Options Consultation. 2.The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) (i.e. the Trunk Road and Motorway network) in England as laid down in Department for Transport (DfT) Circular 02/2007 (Planning and the Strategic Road Network). I have attached a link to the new circular for your convenience. http://www.dft.gov.uk/consultations/about/ria/ria/revise/circularpianniinqandsrn 3.The HA do not wish to comment on the Preferred Options.	Noted.
15. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC HSG1	We are supportive of the identification of the Connington Road Opportunity Area as a preferred location for residential development. However, we feel that the policy is overly prescriptive in identifying the number of units to be accommodated on-site, as the development capacity of the site is yet to be tested; therefore there does not appear to be any robust justification for the estimated dwelling thresholds presented.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes and indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.

Organisation	Policy	Comment	Response
16. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC HSG5	We support the acknowledgement in Policy LTC HSG5 that the degree of housing mix for any given site will be determined by local circumstances and are also encouraged that the Council will be seeking innovative and imaginative solutions to dwelling mix and provision of outdoor amenity space.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG5 (Dwelling Mix) has therefore been deleted.
17. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC SH1	We are supportive of the identification of the Connington Road Tesco store site as an allocated site on which to develop additional food and non-food retail floorspace.	Noted. This is retained in the Further Options Report.
18. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC SH8	We feel that through the quality mixed use redevelopment of the Connington Road Opportunity Area there is the opportunity to incorporate evening economy uses that will complement the range of uses included on-site. The site is large enough to accommodate evening economy uses in areas that will not be detrimental to residential amenity. Also, there should be a definition for the term 'evening economy uses', referencing the acceptable land uses, which should include A3, A4, A5 and D2 uses.	It would be more appropriate for a definition of this to be provided as part of the Development Management DPDs. However, 'evening uses' may well be considered appropriate in this location depending on the nature of development proposals brought forward.
19. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC URB1	Either the policy or supporting text should provide a definition of what is considered to be a 'tall building'.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall Buildings in Lewisham Town Centre has therefore been deleted.
20. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC TRS2	We are supportive of the Council's preferred option which seeks to broadly maintain existing ratios of parking spaces to retail floorspace through increase in provision in line with expansion in retail floorspace. However, the policy needs to acknowledge that where existing retail is redeveloped and expanded, the proposed car parking standards will apply to the additional increase of retail floorspace.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre Parking Standards) has therefore been deleted. References to public car parking strategy has changed.
21. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC OPP5	We are largely supportive of the strategic aspirations for the Conington Road Opportunity Area. However, we feel the policy is too prescriptive in terms of identifying capacity thresholds for the various land uses, which include 1100 dwellings; 6000m2 retail; 200 - 300 car parking spaces; and 3500m2 of public open space. The development capacity on-site has yet to be fully tested and as such there appears to be no detailed justification for how these thresholds have been derived. Site specific detailed technical and design capacity work will be undertaken to identify the site's development potential. In order to maximise the regeneration potential of the site and to ensure that all proposals can be assessed on their individual merits, the policy should only provide a strategic vision for the Connington Road Opportunity Area, setting out the aspirations and key objectives for the area. There should also be recognition that the Connington Road Opportunity Area is in multiple ownerships and therefore the delivery of the development outputs will be brought forward through several independent applications.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes and indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.
22. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC OPP5a	The policy is overly prescriptive in seeking to group new residential development in the north of the site around a new 'Conington Green'	This previously proposed policy has been deleted from the Further Options Report. Following discussion with Tesco and

Organisation	Policy	Comment	Response
Limited		open space. The exact urban form of development should be developed through detailed design testing with the location and form of any open space designed to fit in with the proposed development form. Furthermore, the layout of the residential development currently being developed by St James on the adjacent Blakely and Gilmex site would not enable a central public space to be achieved as envisaged in this policy and the subsequent illustrative framework plan.	GVA Grimley, the Further Options Report proposes a new character area policy site specific policy (Policy 3.1)
23. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC EMP1	We support the recognition of the opportunity to redevelop the existing employment uses in the Conington Road area for a mix of uses including residential. The mixed use redevelopment of this site provides the opportunity to bring forward new development that will increase the vitality and viability of the town centre and assist with integrating existing residential neighbourhoods to the town centre.	Noted. Following discussion with Tesco and GVA Grimley, the Further Options Report proposes (Policy 3) and site specific policy (Policy 3.1) that address these issues.
24. GVA Grimley LLP on behalf of Tesco Stores Limited	LTC TRS1	There needs to be flexibility when applying these car parking standards in certain circumstances. For example,	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre Parking Standards) has therefore been deleted.
25. Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC HSG1	Policy HSG1 is generally supported but should be amended to accord with Policy 3A.2 of The London Plan which requires LPA's to "seek to exceed" their borough housing targets. Clearly Lewisham Town Centre has a key role to perform in terms of providing for new housing, it is suggested that the 4,100 figure should be increased to a minimum of 5,000 units. By reference to Table 3.1 the figure allocated to the Loampit Vale Opportunity Area vastly under estimates the capacity of the development opportunities that can be brought forward before 2016, this figure should be increased to a minimum 2,200 dwellings.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
26. Greater London Authority	LTC OPP6	Object: The release of industrial land without a detailed borough-wide assessment of need is not acceptable. The Council should be supporting a range of uses within the town centre, and not primarily retail and residential based. The fact that the area is deemed to make a "negative architectural contribution" to the town centre is not justification for releasing employment land.	The Employment Land Study was completed in November 2008 to inform the Core Strategy. Earlier proposals to develop parts of Engate Street for non business proposals have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.
27. Greater London Authority	LTC OSI	Object: The policy should be reworded to reaffirm the presumption against inappropriate development of MOL expect in very special circumstances. The term 'in general' dilutes the protection afforded to MOL in particular. In addition, the revised MOL boundary, taking into account the Lewisham Gateway scheme, should be taken through the Core Strategy.	The previously proposed policy on MOL (LTC OSI) has been deleted in favour of the Borough-wide Core Strategy Policy 12 (Open space and environmental assets).
28. GVA Grimley LLP on behalf of Tesco Stores Limited	GENERAL	The policy is overly prescriptive in terms of the location of public open space in the north of the site. The exact location of this space should be determined through detailed design testing to ensure that the space responds positively to the urban form of any new development and meets key urban design principles. There should be a recognition that the form of open space should be appropriate to an urban town centre	Noted. Following discussion with Tesco and GVA Grimley, the Further Options Report proposes (Policy 3) and site specific policy (Policy 3.1) that address these issues.

Organisation	Policy	Comment	Response
		setting.	
Greater London Authority	LTC COM4	Comment: The principle of this policy is supported. However, it should make more explicit that developers will be expected to meet the needs created by their proposals, particularly any needs arising from the social impact assessment.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC COM4 (Major Developments) has therefore been deleted.
Greater London Authority	GENERAL	Support: TfL supports the regeneration of Lewisham and Cufford town centres. TfL will continue to work with the borough to assist in delivering the transport improvements necessary to meet the identified development and regeneration needs. TfL expects the borough to maximise car free developments and seek s.106 contributions to mitigate their impacts upon the public transport network.	Noted.
Greater London Authority	OMISSION	Omission: The AAP should refer to the Mayor's 110 Spaces Project, which includes a site in Lewisham.	The previous Mayor of London's 100 Spaces Project has been discontinued by the current mayor.
Greater London Authority	LTC TRS2	Support: TfL strongly supports the use of shared parking in town centres.	Noted. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS2 (Lewisham Town Centre Parking Standards) has therefore been deleted. However, the promotion of shared private/public car parking spaces is retained.
Greater London Authority	LTC TRS1	Support: TfL strongly supports the proposed car parking standards, which conform with the London Plan. It is noted that cycle parking provision is outlined according to the borough's UDP. TfL's cycle parking standards should be adhered to wherever the UDP standards do not meet this minimum.	Noted. However, in line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre Parking Standards) has therefore been deleted.
Greater London Authority	LTC OS4	Support: This policy is welcomed.	Noted. However, in line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC OS4 (Nature Conservation) has therefore been deleted.
Greater London Authority	LTC OS3	Comment: The biodiversity and open space aims of this policy are supported. However, there is no requirement for children's play space within the town centre, or as part of developments. This should either be included here or in a separate policy within the document.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC OS3 (Enhancing Open Space and Biodiversity) has therefore been deleted.
Greater London Authority	LTC OS2	Support: Supported as a means of creating further connections beyond the town centre.	Noted. The previously proposed policy has been amalgamated with LTC URB7 (Enhancing Lewisham's Waterways).
Greater London Authority	LTC SH9	Comment: Whilst there is no in principle objection to redefining the boundary of the town centre, the document should indicate how Lewisham will deliver the retail floorspace with a reduced site area.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes and indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. These demonstrate that the targets are achievable within a smaller town centre boundary.
Greater London Authority	LTC ENV1	Comment: The principle of this policy is supported. Enhancing the Quaggy River corridor through Lee High Road areas is welcomed and	Noted. The previously proposed policy has been amalgamated with LTC URB7 (Enhancing Lewisham's

Organisation	Policy	Comment	Response
39. Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC HSG4	supports LP policy 4C.3. Policy HSG4 should be amended to clarify that a maximum of 35% affordable housing will be sought subject to the test of financial viability. As worded the policy fails to recognise the impacts that the significant additional costs in providing for major mixed use schemes, such as construction, infrastructure etc can have on the ability to deliver affordable housing. Likewise there should be a greater degree of flexibility within the tenure mix if the financial viability or local housing needs demonstrate that a 70:30 split is not appropriate.	Waterways). In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
40. Greater London Authority	LTC COM1	Supported.	Noted. However, a replacement leisure centre at Loampit vale is under construction and this policy is no longer needed. n/a
41. Greater London Authority	LTC ENV2	Comment: There are extensive areas around the rivers, which include flood zone 3. Development within these areas will require a Flood Risk Assessment in line with PPS25.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC ENV2 (Flood Plains) has therefore been deleted.
42. Greater London Authority	LTC COM3	Supported.	Noted. This policy is proposed to be amended.
43. Greater London Authority	LTC EMP2	Supported.	Noted. This policy is proposed to be amended.
44. Greater London Authority	GENERAL	The LDA should be included as a delivery partner.	The LDA no longer exists, although the GLA is specifically referred to in the text that supports proposed new Policy 3.
45. Greater London Authority	LTC IMP1	Supported.	Noted. This policy is proposed to be amended.
46. Greater London Authority	LTC IMP2	Supported.	Specific implementation options are considered and reviewed as part of new issue 19. Proposed New Policy 3 refers to compulsory purchase.
47. Greater London Authority	LTC IMP3	Comment: The priorities for s.106 monies are all supported as being important to the redevelopment of the town centre. However, the policy should also reflect the strategic s.106 priorities of affordable housing and transport, in accordance with London Plan Policy 6A.4. In addition to employment and training initiatives, it is also important to overcome barriers to work, for example the provision or contribution towards childcare.	Specific implementation options are considered and reviewed as part of new issue 19. Proposed New Policy 3 refers to the Council's Infrastructure Delivery Plan and Local Implementation Plan that include transport projects. The newly proposed Character Area policies (Character Area Policies 1 to 6) make clear that affordable housing is a priority.
48. Greater London Authority	LTC IMP6	Supported. Further guidance on the necessary transport mitigation measures required from development will be given by TfL on a case by case basis.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP6 (Transport Capacity) has therefore been deleted.
49. Greater London Authority	LTC IMP7	Comment: This policy, and the three initiatives proposed, are welcomed in accordance with London Plan Policy 3B.12. However the LDA recommends that the policy includes a requirement for the developer, on major schemes, to submit an employment and training strategy to be secured through the section 106. An appropriate employment and	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP7 (Education and Training Schemes) has therefore been deleted.

Organisation	Policy	Comment	Response
		training strategy would secure implementation, stakeholder and developer involvement, employment and training targets and identify relevant initiatives. This will help to ensure regeneration benefits of a development are secured and delivered.	
50. Greater London Authority	LTC OPP0	Comment: Whilst the principle of the opportunity area policies are supported, there is possibility for confusion with the London Plan Opportunity Areas, of which Lewisham is one. Consideration should be given to the title of these area specific policies, and whether an alternative name would be preferable.	The previously identified 'Opportunity Areas' have been renamed 'Character Areas' to avoid any confusion.
51. DP9 on behalf of Land Securities	LTC SH9	The submission version of the AAP should not include reference to the changes to the town centre boundary. Instead, the town centre boundary, and therefore the extent of the area to which the AAP covers should be included within the introductory chapters of the document.	Noted. Submission version of the AAP will incorporate the outcome of the boundary review.
52. Greater London Authority	LTC OPP1a	Support: As before, these policies accord with London Plan policies, including emerging policies in the further alterations by: sustaining and enhancing the vitality and viability of Lewisham town centre; accommodating economic and housing growth through intensification; supporting the plan's objectives by focusing on the town centre; and furthering sustainability objectives by maximising access by public transport and reducing carbon emissions.	The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
53. Greater London Authority	LTC OS1	Support: In the case of Lewisham Gateway the loss of MOL constitutes inappropriate development but GLA officers are satisfied that very special circumstances exist in that particular case. Normally, however, changes to MOL boundaries should only be undertaken in 'exceptional' circumstances' through the LDF. Replacement of new open space elsewhere is not in itself necessarily sufficient justification.	The previously proposed policy on MOL (LTC OS1) has been deleted in favour of the Borough-wide Core Strategy Policy 12 (Open space and environmental assets).
54. Greater London Authority	LTC OPP4	Object: The release of industrial land without a detailed borough-wide assessment of need is not acceptable. The Council should be supporting a range of uses within the town centre, and not primarily retail and residential based.	Noted. A Borough wide assessment has now been undertaken and proposed Character Area Policy 2 updates the previously proposed Policy LTC OPP4.
55. Greater London Authority	LTC OPP5	Support: The promotion of river restoration in the area of Conington Road is supported.	Noted. Proposed Character Area Policy 3 amends previously proposed Policy LTC OPP5 and maintains references to enhancing the river.
56. Greater London Authority	OMISSION	Omission: The AAP does not refer to the East London Green Grid – which the open spaces in Lewisham town centre form part of.	Amended proposed Policy URB7 (Enhancing Lewisham's Waterways) refers to the Green Grid.
57. Greater London Authority	LTC COM2	Supported.	Planning permission has been granted for a new all-through school on the site of Lewisham Bridge Primary School. This site is proposed to be safeguarded for this use in the Site Allocations DPD and so Policy LTC COM2 has been deleted.
58. CGMS Consulting	LTC OPP6	Lewisham Crown Post Office This is located at 107 Lewisham High Street (outlined blue on the attached plan). The proposed development is concentrated on the opposite side of the High Street and therefore the impact on the property may be acceptable. However, any development	Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.

Organisation	Policy	Comment	Response
Greater London Authority	LTC URB2	<p>proposals including the Post office site would need to provide for a replacement facility in a similar town centre location. Lewisham Delivery Office Lewisham Delivery Office is located in Engate Street (outlined red on the attached plan), where major redevelopment is proposed to increase footfall. The site currently comprises a sorting office, and associated service yard and staff accommodation. Parking is provided for 5 operational vehicles and 24 staff and visitor vehicles. An additional 10 customer spaces are provided off-site. The proposed development shows the potential demolition of all three properties on the west side of Engate Street, including the Royal Mail Delivery Office (Number 32). There are no proposals for the re-provision of these premises. The Delivery Office is a vitally important Royal Mail operational facility providing letter post delivery and collection services to Lewisham town centre and the surrounding area. It is very well located to provide efficient delivery and collection services. It enables Royal Mail to adopt highly sustainable methods of delivery / collection. The town centre location is also vital for meeting the target of delivering to all businesses and community facilities by 9:30 am each day. A total of 57 staff are employed at the Delivery Office which serves a total of 17,414 delivery addresses within the SE13 postal area. The volume of deliveries made by the Delivery Office is on average 250,000 per week which are split between 33 postman's delivery walks and 5 driver deliveries. The hours of operation are 04:30am to 14:00pm Monday to Saturday. Within any development proposal, it is essential that the Delivery Office function is re-provisioned within a central location which satisfies Royal Mail's operational requirements. It should also be borne in mind that a peripheral location may also impact on residential amenity. This is because the Delivery Office operates during unsocial hours. Consequently, would you please regard this letter as an objection to the Area Action Plan in that it does not provide for the re-provision of the Royal Mail Delivery Office.</p>	<p>The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations.</p>
Greater London Authority	LTC HSG4	<p>Object: The principle of the policy to implement the borough wide affordable housing target in Lewisham town centre and not adopt a separate figure is supported. However, the borough wide target of 35% is not acceptable. It is acknowledged that separate discussions are ongoing regarding this issue. The final paragraph of this section (entitled</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.</p>

Organisation	Policy	Comment	Response
		The London Plan) incorrectly states that borough wide affordable housing policies should reflect London Plan Policy 3A.8. In setting a borough wide target the Council needs to accord with Policy 3A.7.	
61. Greater London Authority	LTC HSG2	Support: Accords with London Plan policies that encourage a mix of uses in town centres.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG2 (Mixed use Development) has therefore been deleted.
62. Greater London Authority	LTC HSG1	Support: The borough-wide ten year target of 9,750 accords with the London Plan. The estimated number of dwellings for Lewisham Gateway accords with the current planning application being considered by the Council. This is considered to maximise the potential of the site in accordance with public transport capacity.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
63. Greater London Authority	GENERAL	Omission: The AAP does not have a specific policy on noise. Reference is made to the need to mitigate against noise pollution at the beginning of the document, but not reflected within the draft policies. Policies should be included which reflect London Plan Policy 4A.14. These should include both policies to mitigate and control construction noise and the need to plan and design development in response to surrounding noise sources.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. There is no need for a town-centre specific policy on noise.
64. Greater London Authority	LTC TRS4	Support: TfL welcomes this policy, and suggests that a reference to the need to quantify the impacts upon pedestrians and cyclists within a Transport Assessment would strengthen this policy. Alternatively, this issue could be covered in an additional 'Transport Assessment' policy	Noted. Policy LTC TRS4 has been amended to make specific reference to cyclists as well as pedestrians. In line with Government guidance and to avoid repetition, the AAP will rely on policy on transport assessment contained in the London Plan and Core Strategy.
65. Greater London Authority	LTC TRS5	Support: TfL strongly supports this policy, and suggests that developments below these thresholds that are also referable to the Mayor could also benefit from a Travel Plan. TfL suggests that consideration be given to widening the scope of this policy to include referable applications.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS5 (Travel Plans) has therefore been deleted.
66. Greater London Authority	OMISSION	Omission: TfL considers that all development proposals contained within the Area Action Plan boundary, which are large enough to be referable to the Mayor, should be accompanied by a comprehensive transport assessment, taking into account planned and committed developments. The transport assessment should be formulated in line with TfL's Transport Assessment Best Practice Guidance (2006). A policy relating to transport assessments with reference to this guidance would be helpful. The borough may also wish to consider seeking transport assessments for smaller developments.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. These policy documents set out requirements for transport assessment and no town-centre specific policy is needed.
67. Robert Morley and Company Limited	LTC OPP6	The latest newsletter states your plans for the road in which my business stands Engate Street. When I telephoned your offices I was informed this was just an idea or vision of what the Council would like to see. However on reading the newsletter it was implied some form of compulsory purchase and major redevelopment. I have been in Engate Street since 1975 and am positive that the owners of the three properties down this road would be unhappy with residential or parking in place of the current commercial buildings. Please could your organisation stop putting	Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.

Organisation	Policy	Comment	Response
		<p>forward continual ideas that sound like actual plans which will go ahead and actually get on with the proposed development of the station end which is desperately needed to improve the look of Lewisham to residents and visitors. Every plan for Lewisham would appear to be about high street retail and housing, you are not supporting any business that actually makes or produces goods and these businesses are being forced out of the centre. These small businesses do employ staff who shop in the centre. There is very little or hardly any light industrial units in Lewisham centre area. If we were forced to move or look for new accommodation it would be extremely hard for my business to stay in Lewisham which would be a great shame as the company started in Lewisham in 1881. I would urgently welcome your ideas for our future continued trading.</p>	
68. Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPPI	<p>As organisations who have made their concerns about the proposed Lewisham Gateway scheme well-known we wish to make the following comments on the proposed Area Action Plan. 1. The Lewisham Gateway site is crucial to the success of the Area Action Plan. In spite of repeated suggestions from LGAG, the developers have failed to take the Area Action Plan into account in their assessments of the pressure of extra traffic, pedestrians and commuters. There is no proof therefore, that the Gateway site can handle the cumulative impact of: a) Extra demand for public transport (only Lewisham Gateway has been assessed) b) Increased pedestrian circulation (only Lewisham Gateway has been assessed) c) Increased cycle use (only Lewisham Gateway has been assessed) d) Extra cars (only Lewisham Gateway, Thurston Central and Conington Road developments have been assessed)</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPI a is no longer needed and has been deleted.</p>
69. Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPPI	<p>The modelling which has been done shows that, just taking into account existing traffic + Gateway-generated traffic + traffic generated by the Thurston Road and Conington Road developments will create levels of saturation above those recommended by TfL, at many of the junctions around on the Gateway site.</p>	<p>See above.</p>
70. Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPPI	<p>The "Opportunity Areas and Site Allocations" document describes the gateway thus: "The Gateway site forms the catalyst for the renaissance of Lewisham Town Centre and provides the central context within which this Area Action Plan has been prepared Supported by £15.9 million of Single Regeneration Budget funding, the Lewisham Gateway site is an extremely important development site within the context of the wider regeneration of Lewisham centre, London and the Thames Gateway as a whole." If this is the case then it is foolhardy in the extreme to proceed with the Low H road layout which cannot handle traffic anticipated from a small element of the Area Action Plan, let alone all that is being planned. Rather than build on this crucial site for transport infrastructure we propose that the area be used to secure sustainable transport options, provide flexible responses to future flooding risks whilst realising Lewisham centre's key asset - its rivers and green spaces. We submit an</p>	<p>See above</p>

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71. Greater London Authority	LTC HSG6	<p>alternative vision for the roundabout area at Appendix 1. It is based on principles which could be extended so that a riverside walk is possible along the Ravensbourne from Catford through to Deptford. It prioritises cyclists and pedestrians, whilst improving rather than increasing congestion. It suggests alternative means to provide employment and training and housing. It is an option which will NOT increase pollution in an Air Quality Management Zone. Our vision has been prepared by people who know and love the area. We are not planning experts, but the vision is submitted to demonstrate that other solutions to the roundabout area are possible, cheap and sustainable, and more in line with the original aims of the SRB bid for this area. The elements of our vision are simple. Some are taken from the current application, some are an extension of exemplary work already carried out by Lewisham and some come from our own knowledge and understanding of the area.</p> <p>Supported.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG6 (Housing Density) has therefore been deleted.</p>
72. CGMS Consulting on behalf of Royal Mail Group Ltd	LTC OPP6	<p>We previously submitted comments to the Lewisham Town Centre Area Action Plan Issues and Options Document in October 2005. It is now noted that the Engate Street site, currently designated in the UDP as an Employment Area, is being considered for a shift towards a greater mix of uses. Whilst we do not object to a mixed-use development in principle, we are of the view that existing employment uses in the town centre should be re-provided (Option LTC12A). Within the Preferred Options Area Action Plan we note that there are three Royal Mail properties which fall within the area of this document, two of which fall within Opportunity Areas / Site Allocations (see attached plan). A Royal Mail Delivery Office is located in the Engate Street area and a Crown Post Office is located on Lewisham High Street. The location of these properties is essential to meet Royal Mail's operational needs in the area. In addition, they provide important business and community facilities. The relocation of either or both premises would need to be carefully considered, and any alternative sites would need to meet strict operational criteria in order to maintain the existing level of service provision.</p> <p>Support: TfL strongly supports this policy and welcomes its inclusion into this document.</p>	<p>Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.</p>
73. Greater London Authority	LTC HSG7	<p>high wider spaces out an affordable layout at the point of commercial's jobs i.e. second story building occupied by services of Lewisham facilities to encourage new jobs</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG7 (A Restrictive Approach to Residential Parking) has therefore been deleted.</p>
74. Laurent Durtaud	LTC OPPI		<p>Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.</p>

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75. Laurent Duriaud	LTC OPP2	site is located north-west of Lewisham....include southern end to improve potential existing attractive street market i.e. extend market to south of town centre	Noted. Proposed Character Area 6 (Central character area) replaces previously proposed LTC OPP2.
76. Laurent Duriaud	LTC OPP3	Lee High Road site east of Lee High road redevelopment along public shops to include offices of open space over existing car park, behind the park, small units featuring Lewisham High Street	Noted. Proposed Character Area 4 (Lee High Road character area) replaces previously proposed LTC OPP3.
77. Laurent Duriaud	LTC OPP4	Loampit Vale mixed leisure for uses led for bus layover subject to relocating travellers site along strip to boulevard i.e. travellers site as road with tree-lined pedestrian walk	Noted. Proposed Character Area 2 (Loampit Vale character area) replaces previously proposed LTC OPP4.
78. Laurent Duriaud	LTC OPP5	Conington road DLR building to redevelop residential creation of routes and access establishment of naturalisation of connection to development i.e. routes built by residents from a DLR funded initiative to encourage use of existing pedestrian walkways along embankments of trains	Noted. Proposed Character Area 3 (Conington Road character area) replaces previously proposed LTC OPP5.
79. Laurent Duriaud	LTC OPP6	Engate Waterlink located opposite Library to include format into traffic environment, subject to junction enhancements turning sculpture enhancements into requirements to free flow.. i.e. use the canals for walkways.	Noted. Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policy LTC OPP6 (Engate Street) has been deleted.
80. Laurent Duriaud	LTC SH1	Development, Vision, objectives and strategy objectives Key themes Incorporating sustainability Draft policies: implementation framework phasing Monitoring •Relevant programmes covers the same range of policy themes and topics, notwithstanding the fact that they will be resolved This exercise was also un sustainability considerations at the heart of the process. And options (separately and should be read in conjunction with this Preferred Options •for targets for social-rented (RING CO-OPS) OPTIONS enhancements Lewisham Area Other planning reasons established against:	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
81. Laurent Duriaud	LTC EMP1	EMPLOYMENT SEPERATED FROM RESIDENTIAL	Noted. Proposed Policy LTC EMP1 (Employment Uses in Lewisham Town Centre) has been retained and amended.
82. Laurent Duriaud	LTC SH1	URBAN AS OUTSIDE THE RETAIL CENTRE: Do not: Introduce a geographical basis for designating retail. Approach diversity of Model of Lewisham with family Target the town centre Appropriate £200 million to designated regeneration Plan interchange of Thurston Road Plan for and accommodate identified Tesco block Add retail floorspace FOCUS density Move toward metropolitan status (100,000m2). Establish a new town centre car park. Encourage then identified development plan	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
83. Laurent Duriaud	LTC SH1	Do: improve the local environment consistent with the local economy. Action overall transport. Plan major entrance railway location access. Attract capacity study in order to foster creative industries. Allocate mixed use in the centre. Review Panel Design: professional sectors for each category of research so breaking down developers authority...see urban design groups...more pro-activeness from these groups • Ground the town centre building to gate accommodated capacity and study former retail can help plan • reference to maintain, enhance and	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.

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84. Greater London Authority	GENERAL	<p>manage a sub regional district while growth in proportions are in London</p> <ul style="list-style-type: none"> • Citibank Tower, is marketed for evidence of overview elements with other were rejected development; • linkages between the transport interchange and the town centre retail are not weak. create a new hub that will support the vitality and viability of the Market and issued locations • The Borough's built heritage includes: Key issues and problems CONSERVATION TAKING UP PLACE OF PUBLIC ENCOUNTERS... ART IN PARK <p>Comment: Lewisham town centre is now identified in the draft Further Alterations to the London Plan as an Opportunity Area, along with New Cross and Catford. Policy 5D.2 states for these areas "taking account of other policies, developments will be expected to maximise residential and non-residential densities and to contain mixed uses".</p>	Noted. The Further Options Report takes account of this policy.
85. Greater London Authority	LTC OPPI	<p>Support: These policies reflect the parameters of the current planning application. They provide a welcome set of high design standards and also reflect the broad and growing support for intensification, regeneration and infrastructure improvement in this area of south east London.</p>	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPIa is no longer needed and has been deleted.
86. Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPPI	<p>We propose a solution to the site with the following principles: • Maintain and enhance the site as a transport interchange (see note below)</p> <ul style="list-style-type: none"> • Maximum benefit with minimal disruption. No major road works and all elements possible in phases •Build on and improve the links between bus and rail. Move bus parking (as proposed in current scheme) but create new bus stops and links to connect bus and rail. •Prioritise cyclists, buses and pedestrians in any traffic solution, and especially providing walkways alongside rivers and direct pedestrian crossings; •Improve pedestrian experience and realise Lewisham's natural assets. Improve rivers and the existing green space alongside them to give Lewisham a unique feel and character, providing a better pedestrian experience along with flexibility in dealing with changing flood risks •Improve congestion and reduce pollution. Traffic lights at peak times to stop the roundabout clogging up. Investigate possibility of adding direct pedestrian crossing on an all red phase of the traffic lights. •Realise Lewisham's man made assets. Preserve the heritage of Lewisham by maintaining distinctive local buildings (or at least their facades) and especially the historic Plough pub and Obelisk building, and by safeguarding the setting of St Stephens and the St Stephens conservation area. •Build to complement Lewisham's existing offer. The "Obelisk site" (southern end of Gateway) is a prime site for a department store and/or Cinema, both of which would compliment the existing retail offer and draw people from the transport interchange into it. The new site created within our vision, alongside rail, DLR and new bus stops is ideal for travel related shops, currently missing from the area. Units for Lewisham's creative industries could be incorporated into both sites. Development that would create job and community opportunities for young people, and further enhance Lewisham as a location for the creative industries. Job creation would be encouraged through: 	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPIa is no longer needed and has been deleted.

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		<ul style="list-style-type: none"> Provision of a cinema, arts centre or department store on the old Gaumont site;. • Establishment (possibly with the help of an organisation like Envirowork) of a training scheme on environmental maintenance to provide constant maintenance and supervision of new green spaces; Opening up the leisure centre in the Riverdale again with the emphasis on provision of facilities for young and old people; • Investment in the street market. 	
87. Greater London Authority	LTC URB6	Omission: There is a lack of commitment to inclusive design in the public realm and development projects. In addition, the policy should make more explicit the requirement to 'design out crime'.	Proposed Policy LTC URB56 has been amended to address both of these issues.
88. Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC OPP4d	Principle ii) currently states that buildings of up to 8 to 10 storeys would be appropriate fronting on to Loampit Vale with reductions in height towards Thurston Road. This is overly restrictive. The presence of raised railway lines to the north mean that an appropriate design could include buildings of greater height. The policy should also allow for tower elements within proposals which might exceed 10 storeys. It is noted that the town centre is currently identified as an area suitable for tall buildings.	Previously proposed Policy LTC OPPd (Thurston Road) is to be replaced by proposed Character Area Policy 2 (Loampit Vale Character Area) and Site Specific Policy 2.2 (Loampit Vale North-west of Jerrard Street). These do not refer to storey heights.
89. Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC OPP4	The development capacity that has been estimated for the Loampit Vale Opportunity Area fails to recognise the full potential of this area over the period to 2016. The residential units should be increased to 2,200 dwellings, the retail increased to 20,000 sq.m and the number of parking spaces increased to 800-1,000. These increases would support the stated objectives for Lewisham achieving metropolitan status in terms of retail and also to exceed the housing targets set for Lewisham within the London Plan.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes an indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.
90. Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC OPP1	It should be clarified that the bus layover facility which comprises part of the current Gateway proposals would be sited on the existing Travellers site on Thurston Road. It should also be stated that the nature of the site ownership and potential parcelling of sites provides an ideal opportunity for the phasing of developments in order to facilitate continued retail trading in the area, an important consideration as Lewisham seeks to achieve metropolitan status.	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
91. GVA Grimley on Tesco Stores Ltd	LTC OPP5	Having reviewed the 'draft' document we welcome the policy aspirations for the Conington Road area. In particular we are encouraged by the Council's support for the redevelopment of the Tesco block to increase the existing level of floorspace and aspirations for significant residential development on the site. We look forward to participating shortly in the consultation process of the final phase of the AAP preparation. However, we understand approval of this document for public consultation has been delayed. Accordingly, I provide below an initial view on the detailed policy, should you wish to discuss this further whilst awaiting the finalisation of the document.	Noted. Proposed Character Area Policy 3 (Connington Road) amends previously proposed Policy LTC OPP5.
92. GVA Grimley on behalf of Tesco Stores Ltd	LTC OPP5	There is a danger that overly prescriptive policy could unduly limit or prejudice development on the site. We are concerned about the	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes an

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		<p>suggested development capacity for Conington Road area i.e. 1100 dwellings, 6000 sq.m. of retail, 200-300 car parking spaces and 3,500 sq.m. of open space. The development capacity for the site has yet to be fully tested. As such, there does not appear any basis for putting forward such thresholds. In order to maximise the sites potential and to ensure all proposals can be assessed on their merits, policy should simply provide a strategic vision for the Conington Road quarter, setting out the key aspirations for development. Equally, the framework plan for the development of Conington Road sets out the arrangement of residential and retail blocks on the site. Again the development capacity of the site has yet to be fully tested. Whilst it is important that key aspirations for the site form the basis of any development it is important that policy does not restrict the freedom of a design team to experiment with and deliver the most sustainable arrangement of land uses.</p>	<p>indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.</p>
93. GVA Grimley on behalf of Tesco Stores Ltd	LTC OPP5	<p>To reiterate, we welcome the strategic aspirations the Council are pursuing for the site. Should there be opportunity to discuss these more detailed issues with your policy team ahead of the finalisation of the Preferred Options, we would be happy to do so. Alternatively, given timescales, we are happy to engage with the Council during the formal consultation process.</p>	<p>The Further Options Report has been raffitted from further discussions with Tesco and GVA Grimley.</p>
94. Dru Vesty	LTC OPP2h	<p>I would wish to register an objection to any proposal which involves the redevelopment of the surface car parks around Lewisham Town Centre, including those in Clarendon Road, Slaitwhaite Road and Molesworth Street (found a reference to the latter at LTC OPP 2h). These provide much used parking for short visits, including for elderly people and the disabled, and contribute to the vitality of the shopping centre. In fact, if they are not there, I would prefer to go elsewhere rather than suffer the delay and inconvenience of the multi-storey car park at the main shopping centre (I note that your proposal for Molesworth Street says that parking should be provided elsewhere if it is redeveloped, but this does not include assuming that the multi-storey is a substitute.)</p>	<p>The Further Options Report sets out an amended public car parking strategy. A previously proposed multi-storey car park is no longer being proposed for Engate Street and it is proposed to retain the existing surface car parks at Clarendon Road, Slaitwhaite Road and Molesworth Street. Previously proposed Policies Policy LTC OPP6 (Engate Street), LTC OPP 2h (Molesworth Street surface car park) and LTC OPP3c (Clarendon Green) have been deleted.</p>
95. Dru Vesty	LTC OPP4	<p>I would also wish to object to any more proposals to relocate the Swimming Pool at Ladywell including to any other land uses proposed for this site. It would be desirable if an additional swimming pool/gym could be included as part of any Loampit Vale development, as part of a school and open to the public or by a commercial company, but can see no justification as a Lewisham Council taxpayer for replacing Ladywell.</p>	<p>Planning permission has been granted for a replacement leisure centre at Loampit Vale and Ladywell leisure Centre is proposed to close in 3013, when the Loampit vale centre is open. Proposed Policy LTC OPP4 has been amended to reflect this and the Further Options Report identifies options for the future development of the Ladywell leisure Centre site.</p>
96. Dru Vesty	LTC OPP6	<p>I would wish to support any proposal to remove the triangular stone eyesore on the Engate Street roundabout, referred to on p. 109 of your text as 'existing public art forms visual barrier' and to radically transform the appearance of Lewisham shopping centre by redoing the street furniture and paving to consistent quality standards, adding planting wherever possible and keeping it scrupulously clean.</p>	<p>Noted. Previously proposed Policy LTC OPP6 has been deleted. Proposed Policy LTC TRS4 (Mitigating against the impact of roads and roundabouts), which supports against the town centre has been retained with amendment. Proposed Policy LTC URB6 (Public Realm) has been retained and expanded.</p>

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97. Dru Vesty	LTC HSG4	On new housing, I note that the Mayor now wants family housing as part of the London Plan affordable allocation. If there is not one already, I would wish to object to the Plan's housing policies unless they contain one which requires private external space for all future new dwellings, (with balconies large enough to sit on counting as applicable for this purpose). Also inclusion of the Mayor's open space/play strategy as an LDF plan policy to prevent further developments hostile to children of all ages.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
98. Barriedale Allotment Association	GENERAL	I and many friends enjoy shopping in Lewisham for a few good reasons, which include:- Reasonably sensibly managed traffic. This results outside rush hour there in a courteous and safe interaction between pedestrians and vehicles. Something rare in London! A pleasant environment to drive into and walk around since the Lewisham 2000 project was completed. Are we really to lose this open space, and relatively stress free environment ? Is there really to be more congestion around Lewisham as a result of this development ? We already suffer rat running commuter traffic around Brockley Cross. A few years ago at a meeting of the Brockley Cross Action Group, Steve Bullock promised to look into the possibility of putting in traffic light controlled crossings at Brockley Cross. Nothing came of this and since then at least one person [a schoolboy] has been killed at this junction. We do now have traffic calming measures, but the major problem is volumes leading to driver frustration! Is there any truth in assertions that as a result of the development traffic which would have travelled through Lewisham will seek out alternate routes, which will include residential areas such as ours ? If any of this is true what is the benefit to the residents of Lewisham of this sacrifice?	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1 a is no longer needed and has been deleted.
99. Greater London Authority	LTC EMP1	Object: This policy would allow for ad hoc loss of employment land which is not supported. In accordance with the Mayors draft Industrial Capacity SPG the Council should ensure that in terms of any release of industrial land they have taken into consideration their position in terms of a strategic and local assessment of demand and supply. Lewisham is considered a limited transfer borough for industrial land and the Council should seek to retain those sites in industrial use, which boroughs consider to be most important for industrial users. This may also include poorer quality sites, which provide scope for low cost industrial and accommodation for which there is demand. The Council should ensure it has addressed the criteria in 6.13 to 6.15 of the SPG and identify specifically which areas it wishes to release via the Area Action Plan process rather than through allowing loss of employment land after proof of 18 months vacancy. The Council should also consider that within the AAP the Lewisham Gateway site is the only opportunity area, which promotes other, uses besides retail and residential within the town centre. This could potentially mean a metropolitan centre without land for B uses including offices and those suitable for SMEs. Comment: If any release of employment land is permitted, the period of which buildings need to be	The Lewisham Employment Land Study was completed in November 2008 to inform the Core Strategy. Core Strategy Spatial Policy 2 identifies the Molesworth Local Employment Location to help ensure local employment opportunities and this is reflected in the Further Options Report. Earlier proposals to develop parts of Engate Street for non business proposals have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted. Proposed Policy LTC EMP1 has been amended to provide further protection to employment uses.

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100. Greater London Authority	LTC HSG5	vacant and marketed should be extended to two years in line with paragraph 6.15 of the draft Industrial Capacity SPG. Supported.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG5(Dwelling Mix) has therefore been deleted.
101. Robert Morley and Company Limited	GENERAL	I read with concern the plans that you have for Lewisham. It appears that your organisation is continually putting forward schemes like the redevelopment of the Station area of Lewisham High Street and the old Cinema site however, years go by and nothing ever happens, except the area under threat deteriorates, and makes Lewisham look unappealing to visitors. The buildings at that end have very short term tenants who spend nothing on the buildings and the flats above look derelict - what a great image for Lewisham to portray. We were informed at a local planning meeting which was five years ago that the Council had funding for the plans so why has this not moved forward.	Noted.
102. Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	GENERAL	The policy should be amended to clarify that the provisions of the London Plan Density Matrix will be applied to assess an appropriate density within the defined Opportunity Areas. Whilst, regard will need to be had to the existing building form, massing and character, in areas which are going to experience significant change over the period to 2016, such as Loampit Vale, it will not always be appropriate to pay regard in terms of the scale of adjoining sites particularly where there are low height commercial and industrial units. Supported	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG6(Housing Density) has therefore been deleted.
103. Greater London Authority	LTC URB5	Supported	This policy is proposed to be retained, with amendment.
104. Greater London Authority	LTC URB4	Supported	This policy is proposed to be retained, with amendment.
105. Greater London Authority	LTC URB3	Omission: There is a lack of commitment to inclusive design in development. In addition, there is no reference made to the historic environment.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB3 (High Quality Design) has therefore been deleted.
106. Greater London Authority	LTC URB1	Comment: The criteria should also consider mix of uses/contribution to economic cluster of related activities and/or acting as a catalyst for regeneration.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall Buildings in Lewisham Town Centre) has therefore been deleted.
107. Greater London Authority	LTC SH8	Object: This policy, together with LTC SH5, does not take an integrated approach to managing the night time economy, and is vague. The Catford AAP takes a preferred policy approach to this issue. The policy itself should have a greater evidence base, encouraging a range of night time economy uses.	Noted. However, having reviewed proposed Policy LTC SH8 (Criteria for Evening Economy uses), it is intended to retain it with some amendment.
108. Greater London Authority	LTC SH5	Object: This policy should take a more proactive approach to accommodating and encouraging night-time economy uses, together	Noted. However, having reviewed proposed Policy LTC SH5 (Primary Shopping Areas), it is intended to retain it with some

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109. Greater London Authority	LTC SH4	with LTC SH8. The Catford AAP is effective in this regard and a similar approach should be adopted in Lewisham town centre. Reference should be made to the Mayor's Best Practice Guidance on Managing the Night Time Economy. Supported.	amendment. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH4 (Impact of Lewisham Gateway on Southern part of the Town Centre) has therefore been deleted.
110. Greater London Authority	LTC SH3	Supported.	Noted. It is proposed to retain Policy LTC SH3 (Lewisham Market) with amendment.
111. Greater London Authority	LTC SH2	Support: The proposal accords with London Plan retail policies, including emerging policies in the further alterations by: sustaining and enhancing the vitality and viability of Lewisham town centre; accommodating economic and housing growth through intensification; supporting the plan's objectives by focusing on the town centre; and furthering sustainability objectives by maximising access by public transport and reducing carbon emissions.	Noted. It is proposed to retain Policy LTC SH2 (Viability and Viability) with amendment.
112. Greater London Authority	LTC SH1	Support: As identified in the East London Sub Regional Development Framework, expenditure in Lewisham is expected to increase by 40% by 2016 with the implementation of new development proposals in the centre, the largest of which will be Lewisham Gateway. This expanding retail role will serve to reinforce the centre's existing role as a major town centre by channelling retail proposals into the town centre, which is particularly welcomed. This increase in expenditure is mainly generated by a deeper penetration in the existing catchment rather than an expansion in its size. Lewisham town centre, and Lewisham Gateway in particular, are particularly suited to this strengthened retail role because of the excellent public transport accessibility available. This will bring particular benefits, in terms of widening choice, to those sections of the community without access to a car. The updated Retail Capacity Study is expected to be published in March or May of 2008. This will give updated capacity figures at the town centre level.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH1 (Lewisham Town Centre) has therefore been deleted.
113. Greater London Authority	LTC HSG9	Object: The Residential Standards SPD is not considered to be sufficient with regard to noise to be referenced without further policy support in this document. A more thorough policy response to noise is therefore required within this document.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH9 (Residential Standards) has therefore been deleted.
114. Greater London Authority	LTC HSG8	Support: The Council's proposals to ensure travellers' sites have essential services such as waste are supported. The Council should also ensure recycling facilities are made available near traveller sites where possible.	Core Strategy Policy 2 deals specifically with identifying sites for gypsies and travellers and confirms that the Council continues to monitor their specific needs and will identify a site through the Site Allocations DPD. The Ladywell Leisure Centre site satisfies the selection criteria used by the Council in its search for a Gypsy and Traveller site

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			to meet the anticipated requirements of the Draft Replacement London Plan and is one of seven shortlisted sites in the Borough.
115. Greater London Authority	LTC URB7	Omission: Reference should be made to waterways heritage.	This has been addressed in a proposed amended Policy LTC URB7.
116. Lewisham Association of Street Traders	LTC OPP2j	Toilets for Street Traders Canopy for stalls Local storage Storage in the Lewisham Centre	It is proposed to delete previously proposed Policy LTC OPP2j. However, newly proposed Character Area Policy 6 (Central area character) refers to working in partnership with market traders in order to achieve environmental improvements to Lewisham High Street and the market area.
117. Ray Hall	LTC OPPI	My advice is to: a) At least delay a decision on the Lewisham Town Centre Gateway proposal and the directly inter-related Lewisham Strategic Framework until proper and full consideration of that alternative way forward has been given. b) Work with the interest generated by the Urban Renaissance process, not as 'sugar coating' to hide the negatives of a misconceived "H" plan proposal, but as a basis for enabling genuine team work across the whole community and from there an exemplary people place that can proudly celebrate the name LEWISHAM 9.5 The goal must still be completion of the total people and place project by 2012 so that our community can be showcased on the world stage in the context of the London Olympics and beyond. 9.6 Lewisham as a Town Centre and as a borough really could then be the 'tomorrow' we long for 'today	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPI a is no longer needed and has been deleted.
118. Natural England	GENERAL	The Area Action Plan Objectives are listed on page 9 of this document, and of the nine objectives listed; all are broadly supported by Natural England especially the following; Objective 5 - Open Space/recreation Objective 6 - Transport Section 3.5 - Open Space (page 46 onwards) recommends a preferred option of retention, quality improvement and accessibility, this joint approach is commended, however, there appears to be little or no consideration of increased open space provision. The Council may wish to give consideration to the ANGST Standards mentioned earlier. Section 3.7 - Environment refers to the Rivers Quaggy and Ravensbourne with the Council's preferred approach being to support developments that provide improvements or enhancements to the Rivers, which is welcomed and supported by Natural England.	Noted. The Further Options Report sets out 9 new/amended objectives, including Objective 5 (Open space/recreation) and Objective 7 (Environment). Proposed Policy LTC URB6 (Public Realm) has been amended to make clear that the Council will promote opportunities to improve public realm so that it can make a positive contribution to the need for additional publicly accessible open space.
119. Greater London Authority	LTC OPP2	Comment: The AAP should emphasise the benefits of comprehensive redevelopment of sites for both landowners and the Council.	Previously proposed Policy OPP2 (Lewisham Centre and Adjoining land) has been deleted. Newly proposed Character Area Policy 6 (Central area character area) takes a different more pragmatic approach, focusing on opportunities at the northern and southern ends of Lewisham Centre.
120. Valerie Weber	LTC OPPO	Various things cause me concern. The impact of the scheme on wildlife, which is already under severe pressure in the town centre. One little stretch of river is not going to save the birds that become scarcer every year.	Noted. The Further Options Report continues to include objectives and draft policies relating to biodiversity and improving the environment of rivers.

Organisation	Policy	Comment	Response
121. Valerie Weber	LTC OPPO	High rise blocks are discredited, yet you are suggesting cramming them in. the impact on Lewisham life will be major, from the overshadowing of the area to the destruction of views to the cramming of additional vehicles into an already choked area.	Lewisham Town Centre is the most accessible location in the Borough and benefits from a very wide range of shops and services. High density development, if well managed, can deliver high quality design and have mixed tenure with adequate amenity space.
122. Valerie Weber	LTC OPPO	Sustainable development! You have already allowed the area to be saturated with houses that have huge roof areas and not a solar panel in sight. I cannot see anything in these proposals that will perform any function other than to make the town centre more crowded, polluted and detrimental to health. Try doing what is right for local people and the environment. It may not get a knighthood but it would to respect and a good nights sleep.	The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations. A number of additional references to climate change adaptation and environmental sustainability
123. Kate Brown	GENERAL	More proper river access. No high rise. Not like Croydon Must be beautifully designed quality, this is key. Access to station- Kiss and Ride scheme, drop off needs to improve.	See response to 121. Core Strategy Strategic Site Allocations 6 seeks improvements to the station/public transport interchange.
124. Laurent Duriaud	GENERAL	THE ENVIRONMENT LINKED WITH CULTURE OTHER SPHERES • The cultural strategy baseline access healthy lifestyles foods To protect and enhance To reduce centre positive lifelong learning • amenities for vulnerable: To increase the provision of accessible and inclusive everyday facilities operational PROMOTION IN Day centres • focus requirements of attention should be on child • POOLING AND PRIORITIES what alternatives were considered and why they were rejected N/A • THE HALF FINISHED AS POTENTIAL FOR USE PERHAPS TRANSPORT ROUTES THROUGH public Realm right-angle a street 'half-finished' Three existing buildings in dust Key Objectives' bends lead to proceedings is sculpture Park • examined in rank, of pupils achieving A-C in more than 5 GCSE's. over the last five years, standards in education, as shown by the Standard Assessment Tests (SATs), have also improved in respect of younger students • it is considered that new development in the Lewisham College: How good or bad is the current situation? DO trends show that it is getting better or worse? How far is the current situation from any established thresholds or targets? Are particularly sensitive or important elements of the receiving environment affected (e.g. people, resources, species, habitats)? Are the problems reversible or irreversible, permanent or temporary? HOW difficult would it be to offset or remedy any damage? Have there been significant cumulative, synergistic or indirect effects over time? Are there expected to be such effects in the future? • Neighbourhood Renewal Strategy Crime Neighbourhood policies breed criminal behaviour e.g. neighbourhood watch, therefore break away from the idea of community as a domesticised neighbourhood and promote instead a society of open spaces at the core of neighbourhoods...stop the virus through growth of biodiversity • identify those that contributed to the research document as potential co-operatives in implementation	Noted.

Organisation	Policy	Comment	Response
125. Andrew Grant	LTC URB1	<p>• opportunity Area policies mixing occupational groups habitat would encourage the breathing space of anomalies • produce consultation monopoly essays during progress critique...</p> <p>No tall buildings</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall buildings in Lewisham Town Centre) has therefore been deleted.</p>
126. Roy Hall	GENERAL	<p>8.0 CONCLUSIONS 8.1 The overspend on roads and below ground services in the Lewisham 2000 process lead to the Town Centre's recognized key asset - the market traders - not getting the enhancement they were promised. The market canopies they had planned for and agreed with the Council became an impossibility. Good people and especially a very good man (Ken Walking) were 'crushed'. 8.2 Instead of completing the implementation of the Lewisham 2000 strategy - which could have included subsequent funding of the market canopies - and capitalizing on the investment made, valuable public funds have been spent on planning more roads and below ground services: infrastructure that would remove the benefit of those only recently constructed at such cost. 8.3 Those new costs are in themselves so high as to preclude any possibility of good and relevant provision overtly for the community in the Town centre and especially for young people. As a lover of Lewisham who has committed so much of his adult life to enabling the enhancement of our borough focussed on our town centre - I feel deeply for the market traders and the young people. 8.4 The Urban Renaissance Lewisham "H" plan proposal is therefore fundamentally misconceived. Dressed as "renaissance" it is: a) Yet another road scheme b) Unnecessary. I use the roundabout as a pedestrian almost every day and as a car driver somewhat less. I know it well. Mayor Ken Livingstone's Congestion Charge has had its effect. The number of vehicles passing through Lewisham Town Centre has visibly reduced and beneficially so. I also see that beneficial effect in Belmont Hill where I live and work. A major new road scheme is not necessary. d) Out of date. Congestion charges are being considered elsewhere, including nearby Greenwich Town Centre, which will reduce traffic in our own town centre even more. e) Wasteful and wrong. Spending on road schemes that waste recent and present Misdirecting private sector investment in support is also wrong 8.5 What is needed is to work with the investment already made in money, commitment and even in lives. Work with what we have. Don't waste but build an even better future by enhancing what has been achieved in the past and carrying the present forward in the context of the harsh ecological realities we are facing locally and across our world.</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.</p> <p>Proposed Policy LTC SH3 (Lewisham Market) has been retained with amendment and this seeks improvements to the market area.</p>
127. Ms Wilson	LTC URB3	<p>I would like to see improvements to the public realm. We should also enhance the culture of the Town Centre. Emphasis should be placed on brightening the feel of the Town Centre.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB3 (High Quality</p>

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128. Ms Wilson	LTC OPP2j	Improve the market stalls in line with the new development.	Design) has therefore been deleted. However, the town-centre specific Policy LTC URB6 (Public Realm) has been retained and amended to address this point. Previously proposed Policy LTC OPP2j has been deleted. However newly proposed Character Area Policy 6 (Central character area) refers to working in partnership with market traders in order to achieve environmental improvements to Lewisham High Street and the market area.
129. Helen Robinson	LTC OPP0	Provide 'Café Culture' embracing all ethnicities. Provide a Cinema in the Town Centre. Clean up some of the 'Open Front' shops. They smell of drains and leave rubbish everywhere. More security presence in the day to reduce muggings and other crimes. Attract wider range of shops like the Bromley Glades.	Noted. The Further Options Report includes objectives and a number of proposed policies relating to providing active frontages, designing out crime and improving the shopping offer.
130. Greater London Authority	LTC TRS3	Support: TfL strongly supports the positive policies and statements contained within this document, which relate to the promotion of cycling and walking, including improving connectivity and permeability and enhancing existing links. It would further enhance the document if reference were made to TfL's Walking and Cycling Plans. It is further noted and supported that new at-grade pedestrian crossings will be introduced, and TfL would expect these to comply with BV 165 standards. It is stated that redevelopment would need to analyse the movement of people in order to provide logical pedestrian and cycle links. This is supported, and TfL would recommend that the following be utilised to assist in this, which could be referenced in this document: • A Pedestrian Environment Review System audit; • Pedestrian and cycle counts; and • Fruina Level of Service to ensure that pedestrian facilities are providing adequate capacity for pedestrian numbers (particularly as it is stated that pavements become crowded at peak times). TfL would welcome further discussions on this and further information can be obtained from TfL's Best Practice Guidance on Transport Assessments.	Noted. Policy LTC TRS3 (Cycling and Walking Routes) has been amended, partly to address these comments.
131. DP9 on behalf Land Securities	LTC OPP2j	The provision of contributions towards environmental improvements along the High Street from stakeholders will be delivered through a Section 106 Agreement as part of any planning permission. This policy should be amended to acknowledge this. It is also considered that the wording of this policy should be amended to state 'providing environmental improvements in this core area, such as...'. This provides the opportunity for other schemes to come forward or the schemes that are itemized to be prioritised. Finally, all Section 106 planning obligations need to be relevant to the proposals and are subject to the viability of the scheme proposed.	Previously proposed Policy LTC OPP2j has been deleted. However newly proposed Character Area Policy 6 (Central character area) refers to priorities for site-specific developer contributions. The acceptability of planning obligations (both in-kind and financial contributions) is governed by Government policy and the CIL Regulations 2010. There is no need to rehearse the tests here.
132. DP9 on behalf Land Securities	LTC OPP2i	This policy is welcomed.	Noted. It is proposed to retain this policy.
133. DP9 on behalf of Land Securities	LTC OPP2f	It is considered that the wording should be amended to read as follows 'The Council will encourage the comprehensive redevelopment of the	Previously proposed Policy LTC OPP2f is proposed to be replaced by Site Specific Policy 6.2, which incorporates the

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		Beatifies Buildings and Model Market sites to provide a major retail or leisure uses on the ground with commercial and/or residential uses above. Such redevelopment...'	suggested wording.
134. DP9 on behalf of Land Securities	LTC OPP2e	It is considered that the wording of this policy should be updated to accord with the comments made above, so this policy would relate to the Molesworth Street Environment.	Previously proposed Policy LTC OPP2e is proposed to be deleted. However, newly proposed Site Specific Policy 6.2 addresses this issue.
135. Anna Gichoga	GENERAL	The impact of the development on Viney Road and the surrounding areas have not been taken into account. i.e. parking (there are no restrictions on the periphery of the town centre), environmental impact (local air pollution) increased crime. Wardens don't patrol some of the surrounding area, for example "Viney Road Estate PFI". I truly believe why Viney Road estate never got developed: "Out of sight, out of mind"	Noted. Viney Road is outside of the proposed Town Centre boundaries and is not addressed directly by the Further Options Report. However, impact on and connections with the area surrounding the Town Centre are addressed in the Further Options Report.
136. Ray Hall	GENERAL	3.0 WASTED ASSET : Lewisham 2000 3.11 have in front of me a brochure entitled, "Lewisham 2000: Building a better future" (Appendix Two). It shows: a) A plan of the "New Town Centre Improvements", a dominant element being highway alterations that include a sculpture roundabout at the southern end of Lewisham Shopping Centre and a much larger roundabout at the confluence of Loampit Vale, Lewisham Road, Lewisham High Street and Molesworth Street (which was to be enlarged as a dual carriageway). b) Part of the "better future" proposed was a new Quaggy Park next to St. Stephen's Church. It will feature "a pathway alongside the River Quaggy". c) It shows a "bus station upgraded, with better waiting facilities, and fronted with plants and shrubs" as part of a new interchange with the railway station and the then proposed DLR station. d) Two phases are stated: the first- the construction of the roads, roundabouts and their approaches. Hidden beneath those roads was to be significant re-routing of services (gas, electricity, water, drainage, telecommunications etc) to facilitate that new infrastructure. The intended completion date was March 1994. e) Phase Two was to be completed by the Spring of 1995 and would include "improvements to Lewisham High Street. Once traffic has been removed from the High Street, there will be scope for better use of the space. The market has been a central attraction since the beginning of this century. Lewisham 2000 will strengthen its role even further. " f) A working relationship with the private sector was part of that strategy. For the plan also states that "At a later stage, private developers will be able to take over the empty sites created to provide more shops, offices and leisure places". A key site is called the "Former Odeon Site" at the northern climax of the mall of the Riverdale Centre, and hence the whole shopping centre as it faces the to-be significantly enhanced transport interchange with its rail, DLR and bus stations. g) So important was that interface that it was seen not just as a confluence of transport nodes, including cars, but of rivers (the Quaggy and the Ravensbourne) as well as people as pedestrians and cyclists. That confluence was to be deliberately not through canyons of concrete - whether as river channels or buildings - but through a convergence of	The Lewisham 2000 Local Plan was adopted under the Lewisham adopted Unitary Development Plan 1996, which was superseded by the current adopted Unitary Development Plan 2004. This in turn is being superseded in part by the emerging Core Strategy and the proposed AAP

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		<p>hills and valleys. As a result there was to be a very clear predominance of trees and green spaces throughout, with a sense of openness that could bring immense refreshment into the concentrated heart of South East London which is Lewisham Town Centre and its environs. h) In the "Lewisham 2000" plan, bus stops were shown surrounding the shopping centre causing the whole town centre to be a single interchange of people with pedestrian connections in all directions linking it to the adjacent residential areas. i) Major car parking provision was shown above the Riverdale Shopping Centre and then to its west, east and south serving not just the mall and the to-be pedestrianised High Street - with its market at its heart - but also the total New Town Centre as one transport, retail and social interchange: in a sense a fully revived pivot not only for our borough but for the whole of South East London. j) The key new ingredient in that pivot was undoubtedly to be the northern gateway facilitated by the new roundabout and dominated by trees, planting and the rivers and with the opportunity for significant private sector investment on the sites generated - and especially that of the former Odeon site. Other sites were anticipated in Lewis Grove and at the southern section of the Town Centre. k) The consequence was to be people in a prosperous place they could enjoy, belong and identify with as human beings. A damaged part of our Earth was now able to be revived.</p>	
137. Laurent Duriaud	GENERAL	<p>transport refer to a report of programmatically timings to supplement planning information..? e.g. • Rationalise existing TRANSPORT proportions to work • consider transport links as part of environment/employment/education/dominant vs subsidiary motors/simultaneous action/self powered mobility/threshold elusive/the radical industry of monopoly/acceleration of ineffectiveness/lifetime of transport net/imagination stunted-speed/traffic of industrialisation/Armageddonoptions/crisis energy/forward contents/regions context of transportation agencies structure and focus meetings • links between retail and transport are weak • above score so cannot be whole percentage of travel time travelling to a fairly typical service • direct parts connectivity in comparison to regionally average both no. of the community walking or cycling • implementation both stages The extent to which energy is Renewable objective achieved traffic. depends strongly on a rush from a construction and occupation .</p> <ul style="list-style-type: none"> • this is trains hour • Given the level of public transport accessibility the Council will seek not to issue new on-street parking permits for inhabitants • principally the densities particularly Local Implementation plan include the reduction of congestion allocated criteria based policy should be included within in order to provide a framework to assess the disturbance from the respects of the special in particular sectors community • Travellers site Consistency with Other Council Policy 	Noted.
138. Laurent Duriaud	LTC TRS1	Documents • exceed the maximum parking standards as set out in Table	Noted. In line with Government guidance and to avoid

Organisation	Policy	Comment	Response
39. Laurent Duriaud	LTC EMP1	<p>3.2. Should 10 staff Cycle Parking standards Appropriate taxi ranks and coach/bus parking stands be required as part of the Transport Assessment. • Residential Parking Strategy states that boroughs should seek to ensure that new developments is the minimum necessary (the only exception to this approach is to ensure that developments are accessible for disabled people). • This policy advocates that boroughs adopt the maximum parking standards whilst neighbouring maintain important to the existing interchange • Higher rates will contribute to Developments • Have a significant transport threshold required to submit a travel plan in order to reduce the management measures, including pedestrian routes and facilities; and/or public transport • Re-connect befitting quantum Gateway a Pleasant Key the direct interchange Linkage provide permeable between buses including roundabout DLR network and a safe, metropolitan confluence • Identify stakeholders to public • The Planning Employment Land Reviews in terms of objectives, architecture emphasised land use schemes • number of fatal or serious transport accidents. Between 2001- reduction was results of the recent stakeholder consultation problems with pedestrian particularly conflict</p> <p>EMPLOYMENT • Report majority of respondents during the occupation stages, whilst local people in the ongoing enterprise; jobs in environment sector AND Architecture: promotion of jobs through building works: specify occupations within planning guidance points • Assessment of Employment Significant positive contribution Neutral Negative ? Unknown • will there be short term impacts • Long Large scale Permanent are likely? frequent / constant? Receptor (s) Sensitive Cumulative effects? • Overall error: to be accommodated in such a way as to avoid use of residential streets. • Planning policy Guidance To increase • Authorities particular concern: indices of Multiple Deprivation almost And Lewisham levels the barriers' to crime The living seems as the principal of poverty and social exclusion. Rate compared for out of work over enterprise by the positioned comparators benchmarked. And most stock increased comparatively dominated for nationally rates environmental determinates through use of materials</p>	<p>repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre parking Standards) has therefore been deleted.</p> <p>Noted. Noted. Proposed Policy LTC EMP1 (Employment Uses in Lewisham Town Centre) has been retained and amended.</p>
140. Laurent Duriaud	GENERAL	<p>ISSUE The London Plan BIG USES: UNCERTAINTIES AND RISKS • ECOLOGY PROMOTED AT THE FRONT OF BUILDINGSE.G. THROUGH HEDGE • Re use canals as pedestrian transport use • MENTAL HEALTH ORGANISATIONS CONSULTED IN ASSESSING AMENITY FACILITY TO VULNERABLE AND IN MAKING SUGGESTIONS TO THE BUILT ENVIRONMENT questions addressed to mental health organisations... were the assessment's predictions of sustainability effects accurate? Is the plan contribution to the achievement of desired SA objectives and targets? Are mitigation measures performing as well as expected? Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable? • Lewisham boundary at waterfront addressed a possibility of re-Shipping industry as a mass of wealth transformed into pockets by</p>	Noted

Organisation	Policy	Comment	Response
141. Laurent Duriaud	GENERAL	<p>dealing on the money markets... • Parks and recreation grounds may offer (afford) a break if the weather is fine in winter you have to be well-clad and well-fed to enjoy them: thus the emphasis on open space as recreation should be readdressed as a built recreational form, such as social centres • including evening: worship industrial Assembly warehousing Distribution in Hospitals/medical centres Leisure Residential Hotels Museum Schools Education • Buildings are badly sated and lack rhythm and grain end this: uses at frontages to street support developed. • Refuse collection promoted to support homeless needs e.g. food waste of supermarkets: 1. secondary frontage refuse retail collector back market place. • 24 hour Lewisham: 1. Lighting landscaping clock tower • Development between places of respite and cultural inputs 1. Rank street furniture and taxi public art. • safety of the environment in meeting centrally convenient permeability • located continuation traders attract investment • east-west housing local needs • where reasonable place: Action Area uses in Lewisham High Street to cost Core as follows: enabling including planning existing promoting enhancing focusing policies specific for the use of the land.</p>	Noted
142. Laurent Duriaud	LTC OPP0	<p>Architectural Quality stigma industrial sheds have no architectural merit. • Victorian buildings fragment benefit to the development on the short side of a strong urban edge to the street and the corner • parking is for the large retail uses, Residential accommodation fronting open space opposite \ =points of access to the site. potential for a high quality, high density mixed use development may lead into an area of larger scale-buildings and public space. • it's surrounding context reflected in new proposals. public life in historic decline</p> <p>Opportunity Area Policies • General principles for Adjoining Entrances and Routes Farm Green Public Urban Realm • vehicular servicing and parking Frontage Block Land of Opportunity End Link to Patrol Pit • Strip Use of Centre The Shopping Surface Site Tower and High Road side • Elmira street potential for a new mixed use block • The results of the recent stakeholder consultation identified • To increase good decent standards facilities • Improve Social inclusion of the community town centre . • Manage pedestrian Health publicly • Risk the flood of immigrants and reduce its effects. • Dependency to existing private provision of performance of sources increase access To Heritage culture</p> <ul style="list-style-type: none"> • Efficiency=learning spaces • increase amount of quality associated diversity of vibrant, local density 	Noted
143. Laurent Duriaud	GENERAL	<p>Objective focused around centre whilst fringes categorised for use as an open space...locate policy towards fringes with the powers of attraction, sustenance, digestion, repulsion, nutrition, growth and formation towards mathematical perfection OVER sustainability. the emphasis of the centre as location for retail... change the emphasis maximise use in residential fringes. With a traditional resident population low acre a standard comparatively. classification: Typology sports Ground Allotments parks &</p>	Noted

Organisation	Policy	Comment	Response
144. Ray Hall	LTC OPPI	<p>Gardens square Amenity Greenspace Highways Enclosure</p> <p>a) My view is that the current proposals for the Lewisham Town Centre Gateway site will accelerate the dying process needlessly and irresponsibly. In themselves they are negative and as an exemplar for all of our community they communicate a public and private sector lack of seriousness of response to the reality of life and its terminal fragility. b) In saying this, my focus is the stated very poor carbon footprint for the Gateway project. Greenwich BC has just declared a 0% carbon footprint within 5 years of completion for an equivalent scheme on the former Greenwich Hospital site. Other recently declared schemes in the City and such inner urban areas as the Elephant and Castle are stated as having a 0% carbon footprint at completion. c) My view is that Lewisham BC would be irresponsible as a planning authority - and as the participant owner of a key land component of the project - to accept anything less. d) The Lewisham Town Centre Gateway is, therefore, an opportunity for our community to make a positive contribution toward enabling first the survival of our home planet and then - if it is not too late - her revival. The present proposal fails to grasp that opportunity and instead accelerates the prospect of the death of our Earth. Its concept is therefore fundamentally wrong. e) The Lewisham Town Centre Gateway proposal is also able to be a key component in a Local Strategic Framework that could enable an even greater contribution to the same goals of survival and revival. Two other major opportunities also exist in our borough: namely Convoys and Catford Town Centre. f) A zero carbon footprint should be the goal there too, as it should be for every development and every activity in our borough, including all of our homes. This requires commitment by everyone of us, supported by competent technical guidance and inspirational direction. The public sector through our community's elected representatives must take a lead and do so courageously.</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPI a is no longer needed and has been deleted.</p>
145. Ray Hall	GENERAL	<p>9.1 My purpose in writing this my last consultation response is to say: 'Work with what has been achieved through the very recent Lewisham 2000 process. Don't destroy it. Build an even better future in Lewisham Town Centre and in every part of our borough through its Local Strategic Framework - and do so with a sense of genuine urgency as part of a vision for the survival and revival of our Earth. Above all let us all do it together.'</p>	<p>Noted.</p>
146. Ray Hall	LTC OPPI	<p>2.6 Based on this fundamental criterion, my view is that, a) The present proposal for the Lewisham Town Centre Gateway is fundamentally misconceived and is conceptually wrong. b) As a professional experienced in regeneration I know that there is a far better way forward which - and without any vested interest - I am able to outline as a way forward from the viewpoints of commercial viability, ecological responsibility and urban design. c) That way forward is highly practical. Knowing something of the ethos and capability of both Land Securities</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPI a is no longer needed and has been deleted.</p>

Organisation	Policy	Comment	Response
147. Ray Hall	LTC OPPI	<p>and AMEC/Taylor Woodrow, as well as the heart beat of so many good people in Lewisham Borough Council, my expectation is that it would be welcomed by each and could be implemented through an enlarged joint venture. d) A goal would be full completion by 2012 to enable our town centre to showcase our borough community in the context of the London Olympics and beyond. e) That way forward has the broader community as the primary beneficiary. My trust is that it is able to be welcomed as a different basis for discussion by other individuals and groups representing that community. 2.7 For my view is that the present proposals are immensely wasteful in the use of key public assets: money, land and the goodwill and involvement of local people.</p> <p>Do it with people who care and who have the experience and knowledge necessary locally, environmentally and in terms of urban regeneration - and do it not for political gain but because it makes sense. I do not know them well, but those people should include: a) Land Securities as the owners of the mall which has a reputation for practical concern for our environment. It just may be that they could entice Debenhams back to consider Lewisham Town Centre again. If not now Debenhams: a retailer of equivalent calibre. b) AMEC Taylor Woodrow as the preferred developer for the Urban Renaissance project. I think the project itself has been wrongly conceived. I also think there is a discussion to be had with AMEC Taylor Woodrow as a now interested party can work as part of a larger team to change the direction of recent history and do so for even greater good. c) I also think that the new Deputy Mayor of Lewisham Borough Council, Heidi Alexander, cares. Her responsibility as Chair of Regeneration has, I suspect, been overwhelming at times with many very complex issues to be grasped. I respect that and appreciate her genuine concern enormously. I trust these insights will be of help to her. d) There is one man that stands out in the broader community and who very painfully has, I understand, seen what I have seen having been more formally within the Urban Renaissance process than I. I unreservedly support his recent article in the newsletter of the Friends of the Quaggy. His name is Matthew Blumler. He understands our hills and valleys and their confluence more than anyone I know and can picture what could still be if there was the political courage to dare to change direction. I may be trying to put words into his mouth (if so I apologise) but I suspect Matthew has seen how clever, driving and manipulative Gavin's conception and handling of the Urban Renaissance process has been.</p>	Noted. See above
148. Ray Hall	GENERAL	<p>4.5 it is nevertheless an indication of how perceptive and commercially clever Lewisham Borough Council's original overall Lewisham 2000 strategy was that: a) A key part of the road scheme component - Molesworth Street with its northern roundabout - enabled a primary car park and service area of substance. It was 'b' essentially out of sight, above the mall and also able to serve a future major new department</p>	Noted.

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149. Ray Hall	GENERAL	<p>store on the Former Odeon Site. c) No new junctions were needed to bring that department store into being, nor were traffic lights other than for pedestrians. d) That car park and department store could also have been connected direct to be rail, DLR and bus stations without one pedestrian having to cross one road at grade. e) A total solution was still within reach - and still is.</p> <p>5.1 As can be seen, having analysed the macro planning and detailed issues relevant to enabling our town centre to rise again at the heart of South East London, I saw the Lewisham 2000 strategy as being a viable way of bringing it into being. I was not alone. Many retailers and residents did as well including market stall holder, Ken Walking and the committee he chaired representing the Lewisham Association of Street Traders. The people, therefore, who operated the recognised key asset that brought a distinctive to Lewisham Town centre, were in favour of the Lewisham 2000 proposal.</p>	Noted.
150. Ray Hall	GENERAL	<p>5.4 Why am I recounting all of this? In answer I will let fly some emotions! It is because: a) A town centre is not a road scheme nor is it even a place in isolation. It is a people. Individual, precious people like Derek Moore and Ken Walking. b) It is about the history of their lives, their dreams and their commitment to a better future. c) It is about market traders and senior managers at House of Fraser and Debenhams who want to feel that what they represent is actually wanted - and as much as it is about a young man and woman feeling romantically inclined when sitting on a park bench in Quaggy Gardens. d) It is about trees that have matured and rivers that converge. It is about hills and valleys framing the lives of a confluence of people from every corner of the Earth. e) It is about believing that the investment of one generation really can lead to further enhancement in the next. f) It is about believing that elected representatives and the officers that serve them really do want to work with local people - and not just tick the box of consultation because they have to - then do what they originally set out to do anyway. g) It is about using every ounce of human and environmental resource wisely, recognizing that we all have a role to play in shaping a vibrant "our town centre" where we can all belong. h) It must not be about anyone's personal ego, commercial or power trip. Nor must it be about hiding an error and a failure. i) It is therefore not a power political / curriculum vitae football for elected representatives and officers that are meant to serve but who have high aspirations for themselves. j) Nor is it about any notion of containing Slough Estates into their mall (following a fall-out over the leisure centre) by destroying their hoped site for a department store by proposing a new highway across it: "H" plan or otherwise. k) It is therefore not about not working with an enlightened land owner / developer of national pre-eminence such as the successor to Slough Estates - Land Securities - to shape a total partnership strategy for literally the whole Town Centre as the economic and social heart of our whole borough</p>	Noted.

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151. Ray Hall	GENERAL	<p>and the urban region we have the privilege of being part of.</p> <p>6.0 THE FINANCIAL COST OF THE "H" PLAN 6.1 The following should be noted: a) The stated cost of the Lewisham 2000 highway improvement programme was £34m. More was spent. I do not know the final figure. b) I understand some £9m has already been spent or committed to the Lewisham Gateway Development embodied in its new road scheme - the "H" plan - that would remove the investment made in the Lewisham 2000 programme. c) I also understand that a further £25m will be spent to re-route below ground services and other infrastructure constructed as part of the Lewisham 2000 project to enable the "H" plan if it is implemented. d) The total is £68m and almost certainly more.</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPPI a is no longer needed and has been deleted.</p>
152. Ray Hall	LTC OPPI	<p>6.2 Part of the draft agreement agreed between Slough Estates and Debenhams was the commitment to open their new department store in 2006 on the Former Odeon Site. The following should therefore be noted</p> <p>a) That site was deliberately the right size for such a department store relevant to an urban regional town centre of Lewisham's potential stature. A smaller site would have been non-viable. b) The "H" plan with its central pedestrian boulevard and space consuming separate vehicular servicing inevitably results in much smaller retail units. It is almost as if it was conceived to deliberately exclude any possibility of a department store of the size and capability of a Debenhams. c) As soon as the Town Centre Gateway Development proposal, with its "H" plan, was advocated, even its possibility removed any notion that a Debenhams of a viable size appropriate to the intended status of Lewisham Town Centre could come to our town centre. d) Slough Estates, Debenhams and indeed any party cognizant with the commercial and social dimensions of a viable and thriving town centre knew that its major department store had to be contingent with the main retail offer in its mall. The original Lewisham 2000 strategy embodied that. The "H" plan now deliberately removed that possibility. e) In addition, therefore, to the £68m direct financial cost, some 500 new jobs were lost that could have been generated by a new department store of the size and quality of a Debenhams. f) Those jobs have not enhanced the lives of many young people and their families nor the businesses that could have benefited from the critical mass generated. As a conservative estimate a total of some 1000 new jobs were lost at the conception of the "H" plan and its advocacy - even as an option - by representatives of Lewisham Borough Council. g) The impact into the local economy of those lost jobs since 2006 when Debenhams could have opened could be some £30m per year.</p>	<p>See above.</p>
153. Ray Hall	LTC SH1	<p>6.3 A completed mall should have opened in 2006 with a showcase and high value Debenhams department store as a genuine gateway with pedestrian connections direct to the consolidated transport node with the DLR. It was not. Instead: a) The many people that now travel through Lewisham Town Centre to the now booming Canary Wharf and City see</p>	<p>Noted.</p>

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		<p>dereliction. b) Lewisham's retail core in the mall is hidden behind that dereliction with signage almost desperately saying "I'm here." c) When struggling to find the entrance to the mall, the visitor is greeted by a sterile entrance with low grade retail - including the often empty office of the Urban Renaissance Lewisham team- and a long abandoned leisure centre. It is little wonder that the customer footfall there is minimal. 6.4 To add further pain to this already tragic picture, the market traders still do not have the canopies they and the whole Town Centre deserve. None are even planned. Nevertheless they valiantly add a people face to an overall impression of a low grade, low value shopping centre. 6.6 Perceptions are key. Instead of low grade and potentially unsafe, Lewisham could in 2006 at the climax of the extended Lewisham 2000 process now be seen as being: a) A revived and major town centre at the heart of a newly vibrant South East London. b) A town centre of rising stature moving rapidly toward the renown of a Kingston and certainly one to challenge Bromley and Croydon. c) A town centre with a future and hence one that has also become a family destination with good provision for children. d) A primary youth destination with facilities integrated into the retail offer and easily accessible from the transport node and the community around. More on this shortly. e) A town centre with youth loyalty and the short and long term spend it implies. The vast majority of that spend and allegiance leaves Lewisham and goes to Bromley, Blue Water and increasingly to London East's emerging city centre of Canary Wharf. f) I will explore this more deeply but, as my parents knew so well, when there is youth loyalty there can be consideration toward the elderly. Grannies feel safe and the grand children they love have a natural friend. The resultant cycle is virtuous and priceless. Failure to plan for it and to achieve it is foolishness. This logic could have been a reality now.</p>	
154, Ray Hall	GENERAL	<p>a) So much money has been spent on PR brochures promoting the Urban Renaissance project - implying how wonderfully community centred the whole venture is - yet its reality has been just the opposite. Good people like Steve Bullock, who has featured on several occasions, have been caught in the momentum of a misconceived venture and I think have inadvertently been used. b) That sugar coating has been hiding a fundamentally misconceived scheme and has been part of what appears to have been a deliberate campaign to prevent genuine debate. c) I am not aware of another planning application that has had so much public money and officer time spent on its promotion in the form of brochures, postcards, events and advocacy. At one point a brochure actually declared that the "H" plan will be approved. d) This publically funded PR weighting in favour of an as yet unapproved planning application raises serious doubts as to the objectivity of the planning process adopted by officers and the Council itself. It should be challenged. e) My suspicion is that many Councillors and officers will be</p>	Noted. This is not a matter for the production of this development plan.

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155. DP9 on behalf of Land Securities	LTC OPP2a	<p>horrified when they realize how much they have been caught up in the momentum of something that has been fundamentally misguided and detrimental to true democracy.</p> <p>This policy repeats issues set out within Policy OPP 2. As stated in respect of this policy above, development proposals are unlikely to deliver the changes referred to within this document as these locations would be outside of the site application boundary. These would instead be secured through a Section 106 (or equivalent) Agreement.</p>	<p>Previously proposed Policy LTC OPP2a (Entrances and routes) has been deleted. Newly proposed Character Area Policy 6 (Central character area) sets out a revised form of words.</p>
156. Roy Hall	LTC OPPI	<p>2.3The two proposals (The Local Strategic Framework and the Lewisham Town Centre Gateway) are enmeshed. One must be conceived with the other. Equally, one cannot be concluded without the other. Both plans are fundamental to the very well being of our community and the planet which is our home. Both should have as their primary criterion being exemplars in enabling the survival of our Earth. 2.4 It would be far better to delay a decision on each and to urgently get the fundamental thinking right than to acquiesce to "pressure" to commit to a direction or "a scheme" that threatens the life of our Earth from the outset. I say "pressure"; because there is undoubted historical 'political' pressure to approve the current Gateway proposal for reasons I will outline below. That pressure needs to be confronted and reversed. 2.5 In item 2.4 I also used the phrase "a scheme". I have been told by officers that the present outline planning application is not a scheme and that there will be the requirement for at least one future detailed planning application for the design of the actual buildings. a) The current application is, however, effectively a detailed planning application for a road scheme that establishes an urban design framework. That framework defines the sites that in turn will define the nature of the buildings. Those buildings already have a form and have only to be finalised in terms of detailed design. b) If the current submission is approved, the end scheme will have been shaped: an end scheme that will be accepted as making a negative contribution to the survival of our Earth. c) I am emphasising this because it would be easy to say, "Let us approve the submission and sort out the carbon footprint issue later". My point, however, is - and I know this very well as a designer - if the concept is wrong the final outcome will be wrong too. If the concept is right, then there is the opportunity for an outcome that works.</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.</p>
157. CgMs Consulting on behalf of the Metropolitan Police Authority	LTC IMP3	<p>The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities. Also Circular 05/05 paragraph B9 advises developers may be expected to contribute towards the cost of infrastructure provision, which would not have been necessary, but for their development. Any large scale development proposals in Lewisham town centre may have significant resource implications for the MPA's objectives in seeking to create a safe and secure environment. The MPA are mindful that the planning policy framework supports this objective</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP3 (Lewisham Town Centre s106 Pooling and Priorities) has therefore been deleted.</p> <p>The justifying text to proposed New Policy 3 makes specific reference to the Metropolitan police under Partnership Working and refers to the Council's Planning Obligations SPD</p>

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		<p>and therefore recommend the impact of significant development in policing is given due consideration in the Council's Local Development Framework. The planning policy support for this approach is detailed in the following paragraphs. The provision of effective policing is of crucial importance across London to ensure safe environments are created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). Paragraph 16 of PPS1 states that development plans should promote development that creates socially inclusive communities. It specifically states plan policies should ensure: a) the impact of development on the social fabric of communities is considered and taken into account; b) safe, healthy and attractive places to live are delivered. At a strategic level, paragraph 3.76 of the London Plan recognises the importance of initiatives relating to policing and community safety and crime reduction in improving the quality of life of many Londoners. Given the policy content above, it is important to recognise the role of the police within the provision of community infrastructure and this should be reflected within relevant planning policy documentation. This reflects our representations made at the Issues and Options Draft of the TCAAP. Suggested Alterations An additional criterion should be added to policy LTC IMP3 with the following text: (m)- supporting the provision of emergency services and in particular of the police.' Also policy LTC IMP4 should be altered to read: - 'In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites and major applications'.</p>	<p>(that addresses the need for emergency services infrastructure).</p>
158. DP9 on behalf of Land Securities	LTC OPP2d	<p>reference to the removal of the service ramps does not acknowledge the structural and management issues of the Lewisham Centre. Whilst consideration could be given to this policy as part of any proposal, the changes to the Lewisham Centre that would be required to achieve this are so significant it is unlikely that these would come forward within the lifetime of this document.</p>	<p>The previously proposed Policy LTC OPP2d (Vehicular Servicing and Parking) has been deleted.</p>
159. Environment Agency	LTC ENV2	<p>Proposed Policy – Flooding The Council will seek to reduce flood risk and its adverse effects on people and property in Lewisham and Catford Town Centres by: a) appropriate comprehensive flood risk management measures within or affecting the Town Centres which are agreed by the Environment Agency, b) reducing the risk of flooding from surface water and its contribution to fluvial flooding by requiring all developments of one or more dwellings and all other development over 500m2 of floor space in the Town Centres to have appropriate sustainable drainage schemes. Floor levels for the buildings will be set at a minimum level of the 1 in 100 year flood level plus climate change allowance with an additional 300mm 'freeboard' added to that level. c) maintaining flood storage capacity within flood Zone 3 by refusing any form of development on undeveloped sites which reduces flood storage</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC ENV2 (Flood Plains) has therefore been deleted.</p>

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		<p>capacity or impedes the flow of flood water d) maintaining the effectiveness of the more frequently flooded area (Zone 3b) of the flood plain to both store water and allow the movement of fast flowing water by not permitting any additional development including extensions, e) not permitting residential development or change of use or other 'more vulnerable' uses within Zone 3a or 'highly vulnerable uses' within Zone 2 where flood risks cannot be overcome. f) supporting the redevelopment of existing developed sites in the Town Centre in Zones 3a and 3b for 'less vulnerable' uses where: i. a minimum increase of flood storage capacity of 20% can be secured (all flood storage areas to be effective at all times throughout the life time of the structure/use and do not create unacceptable risks to people in times of flood) ii. reduces impedance to the flow of flood water where there would be flowing flood water iii. appropriate access for the maintenance of water courses is maintained iv. no adverse impact on the integrity and effectiveness of flood defence structures g) requiring any development in Zones 2, 3a and 3b to be designed to be flood resilient/resistant. h) requiring all development proposals within Zones 2, 3a and 3b, and development outside this area (Zone 1) on sites of 0.5ha or 10 dwellings or 1000 m2 of non-residential development or more, to be supported by an appropriate Flood Risk Assessment. Existing riverside access will be maintained and opportunities will be sought to improve access in conjunction with developments in riverside locations.</p>	
1160 Environment Agency	OMISSION	<p>River Ravensbourne and its Tributaries Catford and Lewisham have the River Ravensbourne and its tributaries running through them and is a significant local and regional amenity. This proposed Policy aims to ensure that the setting of the rivers is protected and enhanced. This involves protection of landscape features that contribute to the setting and protecting and enhancing views of the river. Particular care will be needed in assessing the visual impact of development proposals in locations that form part of the setting of the river to ensure that the setting is not damaged and that new development makes a positive contribution to the riverside environment. Proposed Policy: Recreational use of the River Ravensbourne Facilities which support the recreational use of the River Ravensbourne will be safeguarded and promoted by: a) refusing development which involves the loss of facilities unless it can be demonstrated they are no longer required. b) supporting the maintenance and provision of visitor facilities, including those for access to the water. Proposed Policy: River Ravensbourne and its Tributaries The Council will seek to maintain and look for opportunities to enhance the setting of and increase space for the River Ravensbourne and its tributaries. In considering development proposals it will: a) Ensure the protection of landscape features that contribute to the setting of the rivers b) Seek to protect and enhance existing views of the rivers c) Pay special attention to the design of development located in riverside</p>	<p>Three previously proposed policies have been amalgamated into newly proposed Policy LTC URB7 (Enhancing Lewisham's Waterways). This revised policy seeks to address these comments.</p>

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161. Environment Agency	LTC ENV1	<p>settings to ensure that it respects and makes a positive contribution to the setting of the rivers d) Ensure that the quality of the water environment is maintained e) Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained</p> <p>Flood Alleviation Scheme The Environment Agency and other key delivery partners are currently progressing a plan on a major capital scheme to reduce flood risk in Lewisham. This involves the development of a "River Corridor Improvement Plan" for a reach of the Ravensbourne from Ladywell Fields to the confluence of the River Thames. This improvement plan will help ensure the principles of 'making space for water' are maximised and proposed future developments (regeneration) fit into a spatial improvement plan. We propose that this Plan be owned and branded by the London Borough of Lewisham. This river corridor improvement plan shall be put together in conjunction with a professional land agent to address the land ownership issues and the London Borough of Lewisham to address proposed development sites and issues. It is envisaged that there will also be consultation with developers, river user groups and environmental pressure groups to help ensure the benefits of consultation are maximised as well as identify opportunities for collaborative working. This Plan will tie-in with the proposed EU Interreg IVb Urban Rivers for Urban Renewal Project and will serve as the foundation for implementing (constructing) the Ravensbourne at Deptford Flood Alleviation Scheme. This flood alleviation scheme is proposed to reduce the risks of flooding to 500+ properties within Lewisham and is also the proposed match funding for the EU Interreg IVb project bid.</p>	<p>The Further Options Report makes reference to the River Corridor Improvement Plan.</p>
162. Environment Agency	GENERAL	<p>We welcome the inclusion of the Environment Agency as one of the key delivery partners. By continuing to work closely together at all stages we can ensure new development addresses environmental issues and achieves environmental protection and enhancement. The AAPs offers the opportunity to produce development with the highest environmental standards. We would like to work with you on the best ways to manage and improve the green infrastructure and on achieving significantly improved water and energy efficiency.</p>	<p>Noted.</p>
163. CgMs Consulting on behalf of the Metropolitan Police Authority	LTC SH5	<p>Policies LTC SH5 - Core Shopping Areas and LTC SH6 - Non-Core Shopping Areas both restrict the change of use from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres. In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such</p>	<p>Police "shops" can be introduced into the re-filled Primary Shopping Area and Secondary Shopping Areas where they meet the criteria outlined in draft policies LTC SH5 (Primary Shopping Areas) and LTC SH6 (Secondary Shopping Areas). It is not considered necessary to list special circumstances for such Police Shops.</p>

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164. CgMs Consulting on behalf of the Metropolitan Police Authority	LTC SH6	<p>office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'. The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.</p> <p>Policies LTC SH5 - Core Shopping Areas and LTC SH6 - Non-Core Shopping Areas both restrict the change of use from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres. In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'. The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.</p>	See above.
165. CgMs Consulting on behalf of the Metropolitan Police Authority	LTC URB6	<p>Draft policies LTC SH2 - Vitality and Viability and LTC URB6 Public Realm both deal with urban design issues in the Lewisham Town Centre. The MPA recommend that both policies should refer to Secured by Design principles and comply with the ODPM's guidance 'Safer Places: The Planning System and Crime Prevention' in order to ensure that future development meets the Government's highest crime prevention guidance and standards.</p>	Proposed Policy LTC URB6 (Public Realm) has been amended to address this comment.
166. Environment Agency	LTC ENV2	<p>The floodplain is our biggest asset in managing flood risk and meeting the future challenge of climate change. Floodplains should be safeguarded to protect their natural role in allowing for the storage and free flow of flood waters. Inappropriate development within floodplains should be resisted where such development would itself be at risk from flooding or may cause flooding elsewhere. The Town Centre is constrained by the predominately man made rivers, as well as the capacity of the existing sewer and surface water systems. Therefore, a robust approach is needed to manage severe flood risk in the future. Flood risk is managed by conveying water in concrete channels surrounded by development. This is not sustainable and will be increasingly ineffective. The Environment Agency would be unable to justify investing more resources with this way of managing flood risk. Flood defence works are an intervention in natural processes. Therefore a balance has to be struck between maintaining and supporting natural floodplains, and reducing flood risk. The protection of floodplains from the physical threats posed by development is dependent on the powers exercised by local planning authorities. The Environment Agency therefore supports the Councils' proposal to safeguard some flexible areas for flood storage such as the</p>	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC ENV2 (Flood Plains) has therefore been deleted.

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167. CgMs Consulting on behalf of the Metropolitan Police Authority	LTC COM3	<p>proposed Cornmill Park. PPS25 creates a duty to first demonstrate whether a development is being sited in the lowest flood risk zone. The Sequential Test and where appropriate the Exceptions Test are prerequisites and reducing the vulnerability to the development area is not a substitute for this. The effectiveness of rivers and floodplains to convey and to store flood water, and minimise flood risks, can be adversely affected by human activity, especially by development which physically changes the floodplain. Risk to life is of primary concern in relation to any development in areas at risk from flooding, but especially for residential development.</p> <p>The MPA's previous representations, dated 12th October 2005, outlined the need to ensure that where community provision is made elsewhere within the Town Centre the previous site supporting the community provision should not have to be redeveloped or re-used for community uses. It is noted that this has been taken on board through the introduction of an exception criteria policy. However in order to provide clarity to the wording of the policy a minor recommendation is made below. Suggested Alteration The second paragraph of policy LTC COM3 should be altered to read: 'The redevelopment of existing community, leisure and entertainment spaces for alternative uses will only be permitted if it can be demonstrated that...'</p>	Proposed Policy LTC COM3 (Range of Community, leisure and Entertainment Spaces) addresses this comment.
168. Environment Agency	LTC IMP3	<p>We are pleased to note that the council will seek developer's contribution for managing flood risk. Planning Policy Statement 25: Development and Flood Risk (PPS25) makes it clear that it is the responsibility of those planning development to fully assess flood risk, propose measures to mitigate it and demonstrate that any residual risks can be safely managed. However, flood resistance and resilience measures should not be used to justify development in inappropriate locations. PPS25 Annex G provides guidance to Local Planning Authorities regarding the contribution developers should make. Paragraph G5 states that: 'authorities may wish to consider entering into an agreement under Section 106 of the Town and Country Planning Act 1990 to ensure that the developer carries out the necessary works and that future maintenance commitments are met. They may also apply planning conditions, which would require completion of the necessary works before the rest of the development can proceed; Annex F sets guidance on management of surface water. Para F11 states: ' For new development, it may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the development site, if necessary through the use of a Section 106 agreement.'</p>	For each of the proposed character areas that are within Flood Zone 3a, a proposed character area policy that identifies the need to work closely with the Environment Agency over flood risk issues.
169. CgMs Consulting on behalf of the	LTC IMP4	<p>The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime</p>	Previously proposed Policy LTC IMP4 (Partnership and Consultation) is deleted. Proposed New Policy 3 addresses he

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Metropolitan Police Authority		<p>free communities. Also Circular 05/05 paragraph B9 advises developers may be expected to contribute towards the cost of infrastructure provision, which would not have been necessary, but for their development. Any large scale development proposals in Lewisham town centre may have significant resource implications for the MPA's objectives in seeking to create a safe and secure environment. The MPA are mindful that the planning policy framework supports this objective and therefore recommend the impact of significant development in policing is given due consideration in the Council's Local Development Framework. The planning policy support for this approach is detailed in the following paragraphs. The provision of effective policing is of crucial importance across London to ensure safe environments are created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). Paragraph 16 of PPS1 states that development plans should promote development that creates socially inclusive communities. It specifically states plan policies should ensure: a) the impact of development on the social fabric of communities is considered and taken into account; b) safe, healthy and attractive places to live are delivered. At a strategic level, paragraph 3.76 of the London Plan recognises the importance of initiatives relating to policing and community safety and crime reduction in improving the quality of life of many Londoners. Given the policy content above, it is important to recognise the role of the police within the provision of community infrastructure and this should be reflected within relevant planning policy documentation. This reflects our representations made at the Issues and Options Draft of the TCAAP. Suggested Alterations An additional criterion should be added to policy LTC IMP3 with the following text: (m)- supporting the provision of emergency services and in particular of the police.' Also policy LTC IMP4 should be altered to read: - 'In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites and major applications'.</p>	<p>issues raised in this comment.</p>
170. DP9 on behalf of Land Securities	GENERAL	<p>Having reviewed the document in general terms it is considered that there is a significant amount of repetition between this document and national and regional planning guidance, as well as with the emerging policy set out within the Core Strategy and Development Policies DPDs. It is acknowledged that at Submission stage this is likely to be edited down, but we consider that this needs to be considered carefully to ensure that the document is not criticised for being repetitive at the Submission stage.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy, a large number of previously proposed policies have been deleted.</p>
171. DP9 on behalf of Land Securities	GENERAL	<p>It is considered that the linkages as set out on the diagram are not clear. The diagram does not show any linkages in a north south or east west direction through the Lewisham Centre.</p>	<p>All previous images have been revised</p>
172. DP9 on behalf of Land Securities	LTC HSG1	<p>Table 3.1, Page 20: The reference to the 'Lewisham centre' should be</p>	<p>In line with Government guidance and to avoid repetition, the</p>

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Securities		clarified to confirm if this relates to the Lewisham Shopping Centre or Lewisham town centre as a whole.	AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
173. DP9 on behalf of Land Securities	LTC HSG4	It is considered that the wording of condition LTC HSG4 and HSG5 is repetitive of the wording of policies within the emerging Core Strategy. Notwithstanding this, it is considered that these Policies must be flexible to ensure that the type, mix and tenure of housing to be delivered is suitable for the site on which it is to be delivered. For example, family housing generally requires more amenity space and it may not be possible to deliver the required quantum of amenity space in some locations within the Borough.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
174. DP9 on behalf of Land Securities	LTC HSG5	It is considered that the wording of condition LTC HSG4 and HSG5 is repetitive of the wording of policies within the emerging Core Strategy. Notwithstanding this, it is considered that these Policies must be flexible to ensure that the type, mix and tenure of housing to be delivered is suitable for the site on which it is to be delivered. For example, family housing generally requires more amenity space and it may not be possible to deliver the required quantum of amenity space in some locations within the Borough.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG5 (Dwelling Mix) has therefore been deleted.
175. DP9 on behalf of Land Securities	LTC SH1	The identification of the need for additional retail floorspace in Policy LTC SH1 on the Lewisham Centre site is welcomed. The wording within the actual policy should be clarified to confirm what is considered to be short and long term and the difference between convenience and comparison floorspace need should be broken down. The wording of this policy should also acknowledge that within the life time of this document a new retail capacity study may be commissioned and the policy should be able to respond to any recommendations set out within this document. The reference to the land adjacent to the Lewisham Centre should include land to the north to ensure that the wording of this policy is consistent with other policies within the AAP. It is therefore proposed that the condition be amended as follows: (a) Lewisham Gateway (b) Lewisham Centre and land south and north of Lewisham Centre @ Lee High Road - western and eastern ends The policy, or supporting text, should also be amended to make reference to the lack of large units within the town centre at present. It is suggested that the following wording be added in reference to land to the south of the Lewisham Centre in order to achieve this: 'iii. Land south of Lewisham Centre - The Model Market site and former Beatties building represent a major opportunity to anchor the southern end of the centre. This will play an important role as the town's centre of gravity shifts northwards towards Lewisham Gateway. Given this existing uses in this location, redevelopment of this area may not result in a large net increase in retail floorspace, but does provide the opportunity to create large individual units that are lacking at this end of the town centre.'	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH1 (Lewisham Town Centre) has therefore been deleted.
176. DP9 on behalf of Land Securities	LTC SH4	The inclusion of Policy SH4 is welcomed, as it is considered important that	In line with Government guidance and to avoid repetition, the

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Securities		the impact of the Lewisham Gateway proposals on the southern part of the centre is a key consideration in the future of the town centre.	AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH4 (Impact of Lewisham Gateway on Southern Part of the Town Centre) has therefore been deleted. However, the purpose of the previously proposed policy is encapsulated in an amended Policy SH2 (Vitality and Viability).
177. CgMs Consulting on behalf of the Metropolitan Police Authority	LTC SH2	Draft policies LTC SH2 - Vitality and Viability and LTC URB6 Public Realm both deal with urban design issues in the Lewisham Town Centre. The MPA recommend that both policies should refer to Secured by Design principles and complies with the ODPM's guidance 'Safer Places: The Planning System and Crime Prevention' in order to ensure that future development meets the Government's highest crime prevention guidance and standards.	Proposed Policy LTC URB6 (Public Realm) has been amended to address this comment.
178. Sainsbury's Supermarkets Ltd	LTC SH5	The AAP and the Proposals Map both refer to Core and Non-Core shopping Areas within the Town Centre Boundary. This terminology is outdated and inconsistent with PPS6, which refers to primary and secondary shopping frontages. PPS6 states that development plans and proposals maps should identify the Primary Shopping Area, which is the preferred location for retail development. The AAP and Proposals Map should thus be amended accordingly.	PPS6 has since been replaced by PPS4. However, proposed policies LY+TC SH5 and SH6 have been amended to refer to 'Primary Shopping Areas' and 'Secondary Shopping Areas'.
179. Natural England	GENERAL	RELATES TO SUSTAINABILITY APPRAISAL The Executive Summary provides a list of the objectives for this document which are broadly supported, and in particular; Soc 1.3 - Open Space To increase the quality and provision of publicly accessible open spaces'. Indicators proposed for this objective includes the hectare provided per 1,000 head of population. Natural England is supportive of any initiatives to increase the provision of open and green spaces and the following comments may be of use to the Council. Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough. This can assist the Council with identifying the needs of the local community and increase awareness of the value of accessible natural green-space, along with the levels of existing green-	Proposed Objective 5 (Open space/recreation) has been amended. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policies LTC OS3 (Enhancing open space and biodiversity) and LTC OS4 (Nature Conservation) have therefore been deleted.

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180 DP9 on behalf of Land Securities	LTC OPP2	<p>space provision, resources and constraints. The Council's aspiration to set aside 1.7 hectares per 1,000 head of population as an average of open space provision is welcomed and supported, if the above levels of open space provision can not be achieved. Env 2 - Sustainable Transport "To reduce dependency on private cars". Env 8 - Biodiversity "To value, protect and enhance biodiversity". Indicators for this objective includes areas of land actively managed, which is commended and to be encouraged, especially if these relate to agreed management plans and strategies for council owned areas/sites.</p> <p>It is considered that the wording of the policy should be amended to state that the Council 'will seek' rather than 'require' proposals to accord with the requirements set out within the policy to ensure that other consideration can be taken into account when assessing proposals. The following changes are also proposed: Improve existing east west links across the site between Sundermead area to the retail and commercial core of the town centre v) Create a more welcoming environment to Molesworth Street; and Finally, it is not considered that vi) should remain within this policy, as such improvements are likely to be outside the application site boundary for proposals and would instead be secured through a Section 106 (or equivalent) Agreement. This is dealt with in the following paragraph.</p>	Previously proposed OPP2 has been deleted. The newly proposed Character area Policy 6 (Central character area) addresses these comments.
181 DP9 on behalf of Land Securities	LTC OPP2	<p>The following comments are made: -In response to the comments written regarding the public realm, point 1 is questioned as to how retail which faces onto the High Street, with a single point of entry onto this route can be considered to turn its back on the High Street. -The reference to 3/4 storey buildings is inappropriate, given the policy position elsewhere within the document. Preferred Option: it is considered that the reference to 'Molesworth Street Frontage' should be amended to encompass the whole environment to read 'Molesworth Street Environment'.</p>	See above
182 DP9 on behalf of Land Securities	LTC OPP2	<p>Analysis Lewisham Centre and Molesworth Street: It is unclear from this page as to the role of this assessment. Some bullet points relate to an assessment of the existing conditions, including strengths, weaknesses and opportunities within the town centre, but others provide detailed guidance on what might appropriate as part of redevelopment. For example, at Point 5 of Fronts, Enclosure, Scale and Grain reference is made to an 'urban market'. It is considered that this, and other, references are out of context with the exercise carried out within this section and should be removed. Notwithstanding this, within the following amendments are suggested to reflect the current situation and associated issues:- Fronts, Enclosure, Scale and Grain - Point 1: '..Dead ground floor frontages, open vehicle ramps and car park above, all restricted by existing building structure and layout and...' Uses - 'The former Beatties building is redundant and offers and opportunity for a major stand alone unit or one integrated with the Lewisham Centre'</p>	See above
183 DP9 on behalf of Land Securities	LTC OPP2	<p>Public Realm, Page 77: The number 7 shown on the diagram is incorrect.</p>	See above

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Securities			
184. Environment Agency	LTC ENV1	<p>The baseline information is clear on the magnitude of flood risk in the Town centre but this information is not strongly reflected in the Sustainability Appraisal (SA). The SA identifies some conflict between the AAP objectives and Sustainability objectives but flood risk has not been identified as one of the significant negative effects on the plan policies. The SA for the Core Strategy found that one of the key conflicting issues is that the growth areas are largely sited in areas at risk of flooding and many of the proposed policies will have negative effects on flood risk. Policy Env 1 will impact negatively on most of the themes. Strategic Flood Risk Assessment (SFRA) should inform the sustainability Appraisal. Housing allocations will have to draw from the findings of SFRA. Without such an assessment, the sustainability appraisal would be considered incomplete. The extent to which flooding might be an issue in the Town Centre, or how it might affect the area available for development, is not clear from the information available. For this reason part of then Area Action Plan (AAP) does not accord with the guidance in PPS12, that it is not founded on a robust and credible evidence base. It would therefore fail Soundness Tests 4 and 7. The Preferred Options documents, include detailed Site Allocations, made without reference to the SFRA or flood risk. The SFRA should inform the sequential based approach to the location of development within the Town Centre. We would recommend selecting of preferred options areas for residential development following the production of the Strategic Flood Risk Assessment. This may identify areas more suitable for residential development than those currently selected.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV1 (Protect and enhance the environs of the rivers) has therefore been deleted.</p> <p>The SFRA, Core Strategy sequential testing and Sustainability Appraisal have all been used to inform the Further Options Report.</p>
185. British Waterways London	GENERAL	<p>British Waterways is a public body set up under the Transport Act 1968 to manage, maintain and preserve the network of canals and other navigations. British Waterways does not own or manage any land or water within the Borough and therefore has no comments on the Preferred Options Part 2 Consultation or any other LDF consultation documents.</p>	Noted.
186. DP9 on behalf of Land Securities	LTC ENV2	<p>The flood plain covers a significant part of the town centre, and for this reason it is considered that the wording of this policy should be more supportive towards development within the AAP area in order to achieve the objectives of the document. The wording should be related more to PPS25, which allows development on flood plains, subject to the sequential and exception tests.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV2 (Flood Plains) has therefore been deleted.</p>
187. Environment Agency	LTC ENV1	<p>Flooding has implications for the Borough not only in terms of the constraint it places on the location of new development but also as an issue which sits with other 'climate change' related matters. For this reason it is preferable to have both strategic and detailed policies. A detailed policy on flooding is placed within this AAP because of its significant spatial implications in the Opportunity Areas. This proposed Policy will deal with a wide range of actions to reduce flood risk and is</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV1 (Protect and enhance the environs of the rivers) has therefore been deleted.</p> <p>The SFRA, Core Strategy sequential testing and Sustainability</p>

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		<p>intentionally presented in a comprehensive manner to most clearly convey the Environment Agency and the Council's approach. A significant area of both Lewisham and Catford Town centres lies in the floodplains of the River Ravensbourne and its tributaries. The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:- a) Flood defences cannot be built to protect everything. b) Localised defences might be developed. c) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. d) Land for future flood risk management will be identified and protected by authorities. The Environment Agency is not objecting to the redevelopment of Lewisham town centre and is satisfied that development will not cause an increase in flood risk. A comprehensive approach to dealing with flooding and its risks has been followed to avoid adding to the risks to people and property and to seek to reduce the extent of flooding. A refined modelling submitted by the council and developers has removed a number of instabilities within the previous River Ravensbourne model which has improved its accuracy. This includes aspects such as a better demonstration of the way culverts respond to flood flows. Under the proposed scheme, the model shows that there is no raising or backing up of 1 in 100 year flood levels including an 20% allowance in peak river flows for climate change in the River Ravensbourne. There is a slight increase in water levels under the same scenario in the River Quaggy. However, there is sufficient freeboard (safety factor) from peak water levels to surrounding ground levels for us to be confident that flood risk is not increased as a result of the proposals. Removing the existing flood risk from people and property by relocating development is not always a realistic option because of the enormous costs and lack of alternative land outside the flood risk area. A sequential approach of ensuring new development is only in areas not at flood risk would on its own fail to deal with the risks faced by those already living or having businesses in flood risk areas. A pragmatic application of sequential approach to new development would realise the opportunity identified in the Thames CFMP and PPS25 to use development as a way to help manage and reduce flood risk. It would ensure that the continued role of the Town Centres in particular, as a sustainable and accessible location for many facilities including as major shopping centres, could be fully maintained to meet the needs of local residents. The proposed policy also seeks to ensure the capacity of the flood plain is both preserved, and, where possible, through appropriate development, increased and impeded to the flow of floodwater is, if possible, reduced. Redevelopment of existing developed sites in flood risk areas for less vulnerable uses will be supported where they achieve reductions in flood risk through increased flood storage capacity and reduced impedance to flood water flow. Account is taken in the policy of the impact of climate change by highly vulnerable uses not being permitted</p>	<p>Appraisal have all been used to inform the Further Options Report.</p>

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		<p>in the 1 in 1000 (Zone 2) flood area and development in this area otherwise being required to be flood resistant/resilient. More stringent controls on development are made in the 1 in 20 flood risk area (Zone 3b) (referred to in PPS25 as 'functional flood plain') These are areas of generally fast flowing floodwater in major flood events where there are particular risks to people and property. All applications covered by the provisions of the policy will require an appropriate Flood Risk Assessment. This includes sites over 0.5ha, or 10 dwellings or more or over 1000 m2 of non-residential development outside the 1:1000 flood risk area in Zone 1 because surface water flooding into the flood plain from outside it can contribute to flood risk. The extent of the 1 in 20 (Zone 3b), 1 in 100 (Zone 3a) and 1 in 1000/ (100+20% for climate change) (Zone 2) where the SFRA will indicate.</p>	
188. Network Rail	LTC IMP6	<p>Much of the document refers to improving links to Lewisham Station from the various development areas. With this in mind the intention to pool contributions for station enhancements referred to in LTC IMP6 – Transport Capacity is supported.</p>	<p>Previously proposed Policy LTC IMP6 (Transport Capacity) is deleted. However, the supporting text to proposed New Policy 3 identifies Network Rail as a partner and proposed Character Area Policy 3 (Connington Road) identifies improved access to Lewisham Station as a priority.</p>
189. DP9 on behalf of Land	LTC OPP2c	<p>As stated above these changes are likely to be delivered in part through Section 106 Agreement monies, and cannot be delivered by one development alone.</p>	<p>Previously proposed Policy OPP2c has been omitted.</p>
190. Thames Water Property Services	GENERAL	<p>Thank you for consulting Thames Water Utilities Ltd regarding the above. Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2004. A key sustainability objective for the preparation of the new Local Development Framework and AAPs should be for new developments to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.9 of the new PPS12,2004 states: "LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision". Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of infrastructure such as water supply and sewerage in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities...." To meet the test of "soundness" as set out in PPS 12 it is essential that the LDF does consider such water and sewerage infrastructure. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of</p>	<p>Noted. Justifying text to New Policy 3 includes reference to the proposed Lewisham Utilities Network, whose aim is to share information on proposed development and consequences for water, sewerage, electricity, gas and telecommunication services.</p>

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191. Thames Water Property Services	GENERAL	<p>Assessing the Soundness of Development Plan Documents". The Guide sets out a series of 'key questions and evidence requirements' at section 1.4 which aim to provide a framework for the assessment of soundness of DPDs. The most relevant key question under Conformity Test iv (a) is: "Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: "Evidence - Of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible". There are also a couple of relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are: "If the DPD is an Area Action Plan, evidence may includeassessments of infrastructure."</p>	See above
		<p>It will be essential that the AAP makes reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. Therefore, if the AAP is to meet the "soundness" test, then it should include the following section on "Water Supply & Sewerage" as follows: " Developers will be required to demonstrate that there is adequate water supply and waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. For further information on both water supply and sewerage/ sewage treatment please contact Thames Water Utilities , Kew Business Centre on 0845 850 2777, www.developerservices.co.uk, email: developer.services@thameswater.co.uk. For Thames Water to provide these essential services most effectively, it is vital that developers and local authorities consult Thames Water at the earliest possible stage in any development proposal." It is considered that the above text accords with the guidance referred to above in PPS12 and the following: Policy 4A.13 of The London Plan, February 2004, relates specifically to water and sewerage infrastructure and states: "The Mayor expects developers and LPAs to work together with water supply and sewerage companies to enable the inspection, repair and replacement of water supply and sewerage infrastructure, if required, during the construction of development. The Mayor will work with Thames Water, the Environment Agency and other relevant organisations to ensure that London's</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy.</p>

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		<p>drainage and sewerage infrastructure is sustainable." Policy 4A.11 of the London Plan relates to water supplies and states: ".....In determining planning applications, the Mayor will and boroughs should have proper regard to the impact of these proposals on water demand and existing capacity." With regard to surface water drainage, it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding and this should be clearly stated in the AAP. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers. However, it should be clearly recognised in the AAP that SUDS are not appropriate in all circumstances e.g. soakaways will not be appropriate in non free draining areas. In the disposal of surface water, Thames Water will, a) Seek to ensure that new connections to the public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution; b) Check the proposals are in line with Government advice which encourages, wherever practicable, disposal 'on site' without recourse to the public sewerage system; for example in the form of soakaways or infiltration areas on free draining soils; and c) Require the separation of foul and surface water sewerage on all new developments. We would also like to draw your attention to the following issues with regards to the draft AAP: Tree Strategy and Planting – Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes. Access – Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible. Catering Establishments - Thames Water would like Grease Traps to be installed in all catering establishments. These Traps must be regularly cleaned and maintained. Failure to enforce the effective use of grease traps will result in the build up of food deposits in sewers and drains. This can cause blockages and flooding resulting in emergency cleaning. These food deposits may also encourage the migration of rodents into the sewerage system and encourage their proliferation.</p>	
192. Johanna Summers	LTC OPP3b	<p>Lee High road, I would like my view of the redevelopment of the old Hartwell Ford site, it is a really big site, Lewisham needs more supermarkets, the site would be ideal for Asda, loads of parking there, you state commercial shops what do mean?? Also what do you mean</p>	<p>Development has started on site. Previously proposed Policy OPP3b has been deleted.</p>

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193. The Theatres Trust	LTC COM3	<p>creation of new open spaces over the existing surface car park if spaces can be provided elsewhere. I am sorry I don't understand the council jargon, what are they saying. We need more shopping supermarket provision, Sainsbury's is ok, the parking is bad, in Lewisham, carrying a big shop is impossible, the site would really prosper from a good supermarket.</p> <p>We note that Lewisham's leisure offer will be improved by the possibility of a cinema being introduced near the station but that arts and cultural facilities will not now play a part in the social regeneration of Lewisham town centre.</p>	Noted.
194. English Heritage	GENERAL	<p>Thank you for your letters dated 17 August 2007 consulting English Heritage on the above document. Owing to the volume of work that is being generated by the introduction of the new planning arrangements and Strategic Environmental Assessment, we are finding it necessary to prioritise which consultations we are able to respond to. In broad terms, we are endeavouring to respond to consultations where we consider that there are likely to be significant implications for the historic environment. In our assessment the Lewisham has local historic environments of significance by virtue of the conservation areas and archaeological areas throughout the borough. The council's in-house conservation and archaeological advisers should be involved in discussion on the impacts of the plan's policies on these areas. Although we have not been able to provide a response at this stage, I must stress that this does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the document which is the subject of the consultation, and which may, despite the sustainability appraisal, have adverse effects on the historic environment.</p>	Noted.
195. Environment Agency	GENERAL	<p>This relates to Sustainability Appraisal ENV 1 Flood risk should be divorced from climate change. Climate change considerations should be integrated into all spatial planning concerns, including transport, housing, economic growth and regeneration, water supply and waste management. It should be viewed from the wider sustainability objectives and not only reducing the impacts of flooding. Mitigation and adaptation should not be considered in isolation of each other, and opportunities for their integration in the development of spatial strategies, and their delivery, should be maximised. Consideration should be accorded to the area's vulnerability to climate change, using the most recent scenarios available from UKCIP and TE2100, and specifically the implications for built development, infrastructure and services and biodiversity. New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas. The council should require development proposals to take account of the expected changes in</p>	<p>The SA objectives for Lewisham Town Centre AAP were adapted to take the EA's comments into account. Objective ENV1 was amended to read: "To ensure Lewisham town centre is resilient to climate change by using mitigation and adaptation measures through sustainable design and construction." A separate new objective for flood risk created - ENV2, "to reduce the risks and effects of flooding". This therefore ensures that climate change and flood risk are considered separately as part of the sustainability appraisal process, which is particularly important given the location of the AAP area close to a network of rivers; and also ensures that climate change mitigation and adaptation are an important sustainability consideration in the emerging AAP.</p>

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		<p>local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to: • identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, • identify the potential impacts of these changes on the proposed development and its neighbours, • indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gas emissions Annex A Most of the Town Centre development will occur on previously developed land. Therefore the importance of Brownfield sites should be within the scope of the Sustainability Appraisal. PPS23: Planning and Pollution Control, (Nov 2004) has changed the basis for dealing with land affected by contamination. It rests firmly on the precautionary principle. Where development is proposed on or near a site known or reasonably believed to be contaminated a site assessment will be required to establish the nature and extent of the contamination prior to determining the application. Development will not be permitted unless effective measures are taken to treat or control any contamination in order not to: a) expose occupiers of the development land and neighbouring land to unacceptable risk; b) threaten the structural integrity of any building on or adjoining the site; c) contaminate any watercourse, waterbody or aquifer; d) cause the contamination of adjoining land or allow the contamination to continue. Paras 23 and 24: 'The LPA should satisfy itself that the potential for contamination and any risks arising are properly assessed and that the development incorporates any necessary remediation and subsequent management measures to deal with unacceptable risks. Intending developers should be able to assure LPAs they have the expertise, or access to it, to make such assessments. Remediation must reduce the risk to acceptable levels, and make the site fit for proposed development. We would request the council to invoke this approach wherever it considers there might be a risk. Developers should take note of this requirement to know the potential for contamination and the need for initial site investigations and reassurance that the site will not cause pollution to water and soil. The indicator should be 'the number/ area of sites affected by contamination brought back into beneficial use'. Clarification will be required between the term 'contaminated land' which more accurately relates to land determined under Part IIa of the Environmental Protection Act 1990 by the Local Authority and 'land affected by contamination' or 'land contamination' which are the preferred terms for redevelopment situations.</p>	
196 Environment Agency		This relates to Sustainability Appraisal Policy Env6 The requirement to	See above

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		<p>achieve high levels of water efficiency is critical to all new and existing development. We would recommend inclusion of specific reference to water efficiency, water quality and water supply. New homes built to a 120 litres per head per day, or better, water efficiency standard will have a large positive impact on the supply-demand balance. If you are to proceed with high housing growth then water efficiency initiatives are vital to reduce people's daily water use and maintain a supply-demand balance. We note that you have classified this as an activity and not an objective. This SA objective should be included. We suggest that this be strengthened to read 'to improve the quality of controlled waters'. Controlled waters include surface and groundwater, as defined by S.104 of the Water Resources Act 1991. Other objectives would include meeting requirements of the Water Framework Directive and promoting sustainable use of water resources. Additional indicators may include: number of water efficient developments, use of water saving technology and number of new or improved sites. Targets should include the following: All water bodies affected by the plan or programme achieve good status, compliance with river quality objectives, reduce diffuse pollution and eutrophication, reduce water use, reduce demand for water, increase/create riverside and water based opportunities for activities, increase by x% road licence sales, create x km of access to waterways or footpath along waterways. More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters. In both cases the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the Area Action Plan, the council must: i) ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development ii) require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions iii) work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure</p>	
197. Environment Agency	GENERAL	<p>As noted in our response to the Core Strategy preferred options, flood risk is an integral part of the sustainability of new development. Decisions on development in the Opportunity Areas should be made in light of the findings of the forthcoming SFRA and flood risk Sequential Test and, where necessary, the Exception Test. The outcome of this may be that not all</p>	Noted.

Organisation	Policy	Comment	Response
		<p>development types will be appropriate in flood risk areas. Information on improving the flood performance of new buildings would be obtained from Flood resilient construction (Defra May 2007). This document aims to provide guidance to developers and designers on how to improve the resilience of new properties in low or residual flood risk areas by the use of suitable materials and construction details. These approaches are appropriate for areas where the probability of flooding is low (e.g. flood zone 1 as defined by PPS 25) or areas where flood risk management or mitigation measures have been put in place. Specifically this guidance document provides:</p> <ul style="list-style-type: none"> • practical and easy-to-use guidance on the design and specification of new buildings (primarily housing) in low or residual flood risk areas in order to reduce the impacts of flooding • recommendations for the construction of flood resistant and resilient buildings <p>More information on sustainable building would also be obtained from "Planning Policies for Sustainable Building" - a Guidance to Local Development Frameworks (Local Government Association-Oct 2006). It recommends ways of integrating benchmarks for sustainable building into Local Development Frameworks. The report provides a set of suggestions and guidance, which reflect emerging and current good practice, and will help to deliver key policy objectives in areas such as energy, water and the use of materials.</p>	
198. DP9 on behalf of Land Securities	LTC URB1	<p>The criteria set out under this policy are repetitive and should be revised. Furthermore, in order to achieve the objectives of Policy URB4, it is considered that the wording of Policy URB1 should be amended to give more favourable support for tall buildings, subject to the provisions set out within the policy.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall buildings in Lewisham Town Centre) has therefore been deleted.</p>
199. Government Office For London	LTC URB7	<p>LTC URB7 (Enhancing Lewisham's waterways) - Suggest that you add a reference to PPS 25 here as well.</p>	<p>PPS25 is referred to in the reasons for selecting the preferred option, but it is not considered necessary to include a reference to PPS25 in the proposed draft policy itself.</p>
200. DP9 on behalf of Land Securities	LTC OPP2	<p>The development framework plan includes entrances and routes through the site. However, these have not been the subject of any kind of testing to establish the best location for such entrances. Furthermore, no acknowledgment is made of the existing entrances to the Lewisham Centre that are provided by the retailers such as BHS and Marks and Spencer. These linkages should be clearly shown as indicative and subject to further work. An annotated version of the plan is attached to the representations. The estimated development capacity for the area is inconsistent with the retail floorspace stated in Policy LTC SH1 and is misleading in terms of the capacity for significant qualitative changes to this part of the centre.</p>	<p>Previously proposed OPP2 has been deleted. The newly proposed Character area Policy 6 (Central character area) addresses these comments.</p>
201. Government Office For London	GENERAL	<p>The first chapter provides the context for the document, including linkages to the Core Strategy, Sustainability Appraisal and local strategies, which are welcomed. This is followed by detailing the vision, objectives and strategy for the town centre. You indicate that these will</p>	<p>Noted. The Further Options Report has been restructured in light of the progress made with the Core Strategy therefore potential links and cross cutting themes and their relationship with the town centre as a whole can potentially be drawn out</p>

Organisation	Policy	Comment	Response
		<p>be implemented through a spatial land use planning framework developed using a set of themes, including creating a first class environment and developing a prosperous economy. A number of diagrams show how these themes cut across the town centre as a whole. This approach is welcomed though it would have been helpful to show how these issues related to each other throughout the town centre and whether that would cause any tensions/further issues.</p>	further.
202. Government Office For London	GENERAL	<p>Throughout this document you make no reference to the evidence base in your Sustainability Appraisal. This is particularly noticeable in the justification of each preferred option and in the dismissal of others.</p>	The reasons for selecting the preferred options refer to the Sustainability Appraisal.
203. Government Office For London	GENERAL	<p>You have taken the approach within this Preferred Options document of only putting forward one preferred option in draft policy format within each policy area. With this approach you will need to show through the evidence base that there is only one realistic option for each policy remaining at this stage; details of those options being rejected and the reasoning for this; and that you have not closed off other possible options which would have benefited from further consultation. In paragraph 1.2 of the Planning Inspectorate's Local Development Frameworks: Lessons Learnt Examining Development Plan Documents it says that "LPAs should be clear that they are not presenting a "draft plan" at preferred options stage".</p>	Noted. The document articulates the alternate options considered and reasons for their rejection/selection of the progressed option. Note that the relevant Regulations have been amended since the Preferred Options stage.
204. Government Office For London	GENERAL	<p>Draft policies in chapter 3 are found under a range of thematic issues, including housing. It would be interesting to know why you did not continue the more spatial approach set out in the four themes in chapter 2. The draft policies, on the whole, appear to be locally specific which is very much in the spirit of the LDF, for example, LTC HSG1 (Meeting housing need) and LTC COM3 (Range of community, leisure and entertainment spaces), though there does appear to be some repetition of draft policies set out in your Development Policies and Site Allocations DPD which went out to consultation earlier this year - examples include Table 3.2. Parking Standards. Whilst we recognise that draft policies within this document are related more to town centre issues they can be more specific in their nature rather than being generic (as suggested in PPS12), for example LTC URb2 (Sustainability) to LTC URb6 (Public Realm). Some policies are also rather long, which can be construed as them being compounded in order to reduce the overall number of policies, for example LTC IMP3 (Lewisham town centre s106 pooling and priorities) and LTC URb2 (Sustainability). Some more detailed comments on these policies are set out in the attached Annex. Under the tests of Soundness this relates to test(vii).</p>	Noted. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. A large number of the previously proposed policies have therefore been deleted.
205. Government Office For London	GENERAL	<p>To help put the above policies into context, and hopefully as a result of this receive more meaningful responses, you do however list the options considered during the Issues and Options consultation stage of this document and comment on the responses received from this. A reasoned justification which considers national and regional policy and</p>	Noted.

Organisation	Policy	Comment	Response
206. Government Office For London	GENERAL	<p>the Community Strategy (though not other local strategies) is also provided.</p> <p>Chapter 5 covers the implementation framework for taking forward proposals within this document. We welcome the inclusion of the table which details the phasing and delivery partners for each site; and the table that provides an overview of the monitoring you consider should be undertaken as part of the implementation of the policies within this document. There are some issues, however, which we consider need to be addressed: -Have you secured funding to take forward the redevelopment of the six sites in both the short and long term? -The Lewisham Gateway site is subject to a planning application. Do you have any options for the redevelopment of the site if this is not approved or would it have some fundamental implications for you taking forward this document to adoption? -Have you started working with the appropriate partners/stakeholders who are necessary to take forward the redevelopment of the 6 sites? Are your preferred options flexible enough to amend some of the proposed redevelopment should you not have the buy-in from some/all of the stakeholders concerned and you are not be able to use compulsory purchase powers?</p>	<p>The Council's Infrastructure Delivery Plan, referred to in justifying text of new Policy 3, includes the Infrastructure Schedule that identifies delivery agencies, timescales, funding and contingency planning. A similar approach will be considered for the AAP itself.</p> <p>Consultation has continued with land owners.</p>
207. Government Office For London	GENERAL	<p>You have produced a Sustainability Appraisal and Strategic Environmental Assessment report for your Core Strategy. I understand that you are liaising with the Environment Agency regarding undertaking a Strategic Flood Risk Assessment. Will this be completed in time to feed into your evidence base before you proceed to submission?</p>	<p>SFRA now complete.</p>
208. Government Office For London	GENERAL	<p>On a more general point, the light print colour of the text and landscape format made this document more difficult to read.</p>	<p>Noted.</p>
209. Government Office For London	LTC HSG4	<p>LTC HSG4 (Affordable Housing) - Your preferred policy is to seek to secure 35% of new private residential build as affordable housing. London Plan policy 3A.8 says that "Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes". Given that the wording within this policy does not refer to the maximum reasonable, as set out in the London Plan, you would need to provide strong justification that this policy is the most appropriate to be delivered within your borough.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.</p>
210. Laurent Duriaud	LTC HSG1	<p>IN HOUSING: • Lewisham implementation body • Conflict positive In rented social housing stock Lessen target under the proposed alterations projected in the London Plan • Negotiation with developers: The preferred REASONS Board. In the scene : investment Regeneration Budget the Local Implementation Plan (LIP) and single Regeneration Budget (SRB) schemes, the Economic Development Plan informal Community Safety Plan. The Local Agenda • Property (£) Number of renting applying for homeless in temporary accommodation To increase the provision of connectivity to developed land as renewable objective with the powers of attraction, sustenance, digestion, repulsion, nutrition, growth and</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need).</p>

Organisation	Policy	Comment	Response
211. Government Office For London	LTC URB1	formation and aim towards mathematical perfection OVER LTC URB1 (Tall buildings in Lewisham town centre) - This is largely repetitive of U16 in the draft Development Policies and Site Allocations DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall buildings in Lewisham Town Centre) has therefore been deleted.
212. Government Office For London	LTC OPPO	Chapter 4 identifies six opportunity areas within the town centre which are aimed at enhancing its vitality and viability. By naming these 6 sites as opportunity areas will this cause confusion with those set out in the London Plan? The first draft policy in this chapter appears to be an overarching policy forming the basis for development proposals within the six opportunity areas. Each site is then considered in detail within this chapter, and we welcome in particular the inclusion of (i) a description of the existing area; (ii) an analysis, including the use of diagrams, depicting what you consider to be key issues of the sites; (iii) details of key objectives and opportunities; (iv) Issues and options covered at the Regulation 25 stage; and the reasons for the preferred option, including national and regional policies and the Community Strategy. However, no reference has been made to the accompanying Sustainability Appraisal and other local strategies in your reasons for taking forward your preferred option. Some more detailed comments with regards to the draft policies for the opportunity areas are set out in the attached Annex.	References to 'opportunity areas' have been replaced with 'character areas'. References have been included to Sustainability Appraisal.
213. Government Office For London	LTC TRS1	Table 3.2 (Lewisham town centre parking standards) - This appears to repeat those car parking standards set out in the draft Development Policies and Site Allocations DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham town centre parking standards) has therefore been deleted.
214. Government Office For London	LTC TRS5	LTC TRS5 (Travel Plans) - This largely duplicates policies set out in the draft Development Policies and Site Allocations DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS5 (Travel Plans) has therefore been deleted.
215. Government Office For London	LTC ENV2	LTC ENV2 (Flood Plains) - Would it be appropriate to cross reference this policy to PPS25 and/or SE4 on the draft Development Policies and Site Allocations DPD in relation to the application of the sequential test?	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV2 (Flood Plains) has therefore been deleted.
216. Government Office For London	LTC COM2	LTC COM2 (A new secondary school for the town centre) - Is this a realistic option i.e. are you working closely with colleagues in your Council's education department to determine whether a school would be required during the lifetime of this document and that they would have the funding to take this forward?	It is proposed to amend this policy. Planning permission has now been granted for a new all-through school in the town centre.
217. Government Office For London	LTC IMP2	LTC IMP2 (Compulsory Purchase Order powers) and LTC IMP3 (Lewisham	In line with Government guidance and to avoid repetition, the

Organisation	Policy	Comment	Response
London		town centre s106 pooling and priorities) - These appear to be covered by CPI3 and CPI 4 in your draft Core Strategy.	AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP2 (Compulsory Purchase Order powers) has therefore been deleted. However, reference is maintained in justifying text for proposed New Policy 3.
218. Government Office For London	LTC IMP3	LTC IMP2 (Compulsory Purchase Order powers) and LTC IMP3 (Lewisham town centre s106 pooling and priorities) - These appear to be covered by CPI3 and CPI 4 in your draft Core Strategy.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP2 (Compulsory Purchase Order powers) has therefore been deleted. However, reference is maintained in justifying text for proposed New Policy 3.
219. Government Office For London	LTC IMP4	LTC IMP4 (Partnership and consultation) - This repeats PPS12.	This previously proposed policy has been deleted.
220. Government Office For London	LTC OPP0	LTC OPP0 (Opportunity area policies) - Are you going to define what you mean, for the purposes of this document, by "general conformity".	This previously proposed policy has been deleted.
221. Government Office For London	LTC OPP1	LTC OPP1 (Lewisham Gateway opportunity areas) - What do you mean by "where reasonable" with regards to development contributions?	This previously proposed policy has been deleted.
222. Government Office For London	LTC OPP2b	LTC OPP2b (Urban form) and LTC OPP 2c (Public realm) - Do these repeat general policies set out in chapter 4?	Noted. These previously proposed policies have been deleted
223. Government Office For London	LTC OPP2c	LTC OPP2b (Urban form) and LTC OPP 2c (Public realm) - Do these repeat general policies set out in chapter 4?	Noted. These previously proposed policies have been deleted.
224. Government Office For London	LTC HSG8	LTC HSG8 (Traveller's sites) - Circular 01/06 says that the Core Strategy should set out the criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG8 (Travellers Sites) has therefore been deleted.

Appendix 3

Audit of Issues, Options, Preferred Options and Policies

Table 1: Area-wide policies

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
Housing				
ISSUE LTC1: The Borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?				
<p>LTC1A Have policies seeking to increase the density of residential uses (see issue LTC3)</p>	<p>The preferred option is an approach that combines elements of all three options to have policies which encourage high density residential uses [LTC1A], encourage the redevelopment or conversion of existing sites with residential uses as part of a mix [LTC1B] and also encourages new mixed use (to include residential units of varying size and tenure) development in the town centre, perhaps by the allocation of specific additional sites. [LTC1C].</p>	<p>LTC HSG1 - MEETING HOUSING NEED New development should, where possible, include residential uses at an appropriate density (see LTC HSG 6) to ensure land is being put to best use and assist in meeting the borough's housing target of 9,750 additional dwellings by 2016. It is estimated that mixed use development of key sites as identified in the Opportunity Area policies and on the Proposals Map will allow provision for approximately 4,100 additional homes. Table 1 outlines the estimated number of additional homes for each Opportunity Area.</p> <p>LTC HSG2 – MIXED USE DEVELOPMENT The Council will expect new development in the town centre to provide a mix of uses, including independent residential accommodation with separate access. Exceptions may be considered where it can be demonstrated that the site is not suitable to accommodate a mix of uses. Guidance for appropriate mix of uses for key development sites is provided in the Opportunity Area policies.</p> <p>LTC HSG3 – CONVERSION OF EXISTING BUILDINGS The Council will encourage the conversion of existing buildings such as vacant offices or premises above shops for residential purposes provided that: (a) a satisfactory living environment can be provided;</p>	<p>Omitted</p>	<p>Not required as repetition of London Plan targets. Density is specified in CSP15. CSSP2 states 2,600 additional homes, not 4,100. Covered by CSP1 and London Plan LP3.3, LP4.2</p>
<p>LTC1B Have policies encouraging the redevelopment or conversion of existing sites with residential uses as part of a mix (e.g. employment/ retail ground floor with residential above).</p>			<p>Omitted</p>	
<p>LTC1C Promote new development in the town centre including residential uses as part of a mix of uses. This</p>			<p>No change</p>	<p>LP makes reference to conversion of existing buildings (LP4.2), but there is a need to define a</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
could be achieved by the allocation of specific additional sites in the town centre to include some residential development of varying size and tenure.		(b) there is no conflict with existing land uses; and (c) the proposal complies with policy LTC EMP2.	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	<p>Lewisisham Town Centre specific criteria-based policy in the context of the importance of employment uses as emphasised in consultation feedback.</p>
ISSUE LTC2: The Council will seek to deliver and exceed an additional 9,750 homes to be built by 2016, of which 3,160 will be affordable housing. Should there be a specific town centre affordable housing policy?				
<p>LTC2A No specific affordable housing policy is required for Lewisisham town centre, and a Borough wide affordable housing policy should be adhered to.</p> <p>LTC2B A policy which takes a more flexible approach to the provision of affordable housing in Lewisisham town centre in terms of size, tenure, location and quantity of provision. This may result in the delivery of fewer affordable homes than option LTC2A.</p> <p>LTC2C</p>	<p>The preferred option for this issue is closest to LTC2A, to provide no specific affordable housing policy for Lewisisham town centre, with adherence to the Borough wide affordable housing policy by default. In addition to affordable housing, the preferred option encourages provision of a policy on dwelling mix.</p>	<p>LTC HSG4 – AFFORDABLE HOUSING Where a development site is capable of accommodating 10 or more dwellings or is 0.3 hectares or more, the Council will seek to secure 35% of new residential build as affordable housing. The required affordable housing tenure mix will be 70% social rented and 30% intermediate provision delivered across private sites.</p> <p>Developers would be required to demonstrate a mechanism for retaining affordable housing in perpetuity.</p> <p>LTC HSG5 – DWELLING MIX The Council will expect new housing development on proposals for 10 units or more to provide a full mix of dwelling type and sizes, including family units. A family unit is considered to consist of 3 or more bedrooms and include a directly accessible, private amenity space of appropriate size. The degree of the housing mix for any given site will depend on local circumstances and site characteristics. The Council will encourage innovative and imaginative solutions to dwelling mix and provision of</p>	Omitted	<p>Repetition of Core Strategy and London Plan policies: CSP1 / LP3.12, LP3.13 and LP3.14</p> <p>CSP1 – starting point for negotiation = 50% affordable.</p> <p>Both are repetition of London Plan and Core Strategy and there is no evidence for a town centre specific approach</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
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.		outdoor amenity space.	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	LP = Draft London Plan CS = Emerging Core Strategy
ISSUE LTC3: How best can the AAP process promote higher residential densities in areas of high public transport accessibility?				
LTC3A Retain existing Sustainable Living Area (SLA) approach (as defined in the existing UDP).	The preferred option is a combination of all three options; to bring forward an approach that seeks higher densities in a sustainable location (similar to the SLA approach of the current UDP) and also to support car-free housing where appropriate and to consider the removal of rights to on-street parking permits for occupiers of new residential developments.	LTC HSG6 – HOUSING DENSITY The Council will expect housing densities of new development to be appropriate to the local setting in terms of existing building form, massing and character. For guidance, the Council will consider Lewisham Town Centre a 'Central' setting when referring to the London Plan Density Matrix (Table 4B.1, London Plan, 2004).	Omitted	CSP15 states that LTC must be considered as 'Central' in relation to LP table 3.2 under Policy 3.4
LTC3B Promote car-free housing.				
LTC3C Consider the removal of rights to street parking permits for occupiers of new residential developments.		LTC HSG7 – A RESTRICTIVE APPROACH TO RESIDENTIAL PARKING Within Lewisham Town Centre, the Council will promote car-free housing. As a starting point in negotiation with developers, the Council will seek not to issue new on-street parking permits for inhabitants of new residential development. Exceptions may be made for people with disabilities and mobility problems.	Omitted	CSP14 / LP6.1 provide appropriate standards
ISSUE LTC4: How should the AAP make provision for the traveller community?				
LTC4A	The preferred option is	LTC HSG8 – TRAVELLERS' SITES	Omitted	CSP2 identifies a

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
Identify and allocate a traveller site within Lewisham town centre.	option LTC4C which states that criteria based policy should be included within the AAP in order to provide a framework to assess the suitability of new proposals.	There are no identified travellers' sites within the Lewisham Town Centre. However, if proposed within the town centre, gypsy and travellers' sites will be assessed against the following criteria:	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	policy approach and sites are to be identified for this use through the Site Allocations process.
LTC4B Identify and allocate a traveller site outside Lewisham town centre.		(a) it is accessible to local shops, services and community facilities in particular schools and health services;		
LTC4C		(b) it has safe and convenient access to the road network;		
Include a criteria based policy in order to provide a framework to assess the suitability of new proposals.		(c) it has provision for parking, turning, service and emergency vehicles and servicing of vehicles;		
		(d) the activities do not have an adverse impact on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site;		
OTHER POLICIES		(e) it has a supply of essential services such as water, sewerage and drainage and waste disposal; and (f) it is designed and landscaped to a high standard. LTC HSG9 – RESIDENTIAL STANDARDS Proposals for residential development should provide an acceptable standard of accommodation in accordance with Council's Supplementary Planning Document "Residential Development Standards", June 2006.	Omitted	Repetition of LP Policy 3.6 and SPD
Shopping and Town Centre				
ISSUE LTC 5: How can Lewisham town centre best move towards Metropolitan Centre status?				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC5A Rely on existing site allocations for new retail development in the town and determine applications for additional retail developments on their merits.</p> <p>LTC5B 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 achieve Metropolitan Status (100,000sqm).</p>	Option LTC5B is the preferred option.	<p>LTC SH1 – LEWISHAM TOWN CENTRE The Council will seek to increase the amount of retail floorspace, in particular comparison floorspace, to support Lewisham's move from a Major Centre to a Metropolitan Centre. Approximately 43,000m² of additional food and non food retail floorspace is anticipated to be provided within the short to long term mixed use development of the following site allocations:</p> <p>(a) Lewisham Gateway (b) Lewisham Centre and land south of Lewisham Centre (c) Lee High Road – western and eastern ends (d) Loampit Vale (e) Conington Road - Tesco block (f) Engate Street</p>	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>CSSP2 covers this strategic target. Although policy is not required, site specific character area policies incorporate broad capacities for implementation purposes</p>
<p>ISSUE LTC6: How can Lewisham town centre's vitality and viability be best supported?</p> <p>LTC6A Public realm enhancements</p> <p>LTC6B Encourage new development on the Lewisham Gateway site to raise profile of town centre as a whole</p>	<p>It is considered that in order to promote the vitality and viability of Lewisham town centre, a combination of all options would prove most effective. The draft policies also recognise the</p>	<p>LTC SH2 – VITALITY AND VIABILITY Development should sustain and enhance the vitality and viability of the town centre in the context of the strategic development of Lewisham Gateway. To ensure this, the Council will encourage the following: (a) Implementation of Lewisham Gateway proposals (see Core Strategy Strategic Site Allocations Policy 6) (b) Public realm enhancements (see LTC URB6);</p>	<p>Retained with amendment</p>	<p>There is a clear need for specific policies that focuses on the vitality and viability of the town centre and the market as an extension of CSSP2. Minor amendments and additions to</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC6C Support a greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer</p>	<p>importance of the market in supporting the vitality and viability of the market.</p>	<p>(c) Retail and mixed use allocations on key development sites (LTC URB4); (d) A greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer (see LTC SH8); (e) Incorporation of design principles such as a mix of uses, active frontages and effective street lighting with a view to making the town centre a safer place (see LTC URB4, LTC URB5 and LTC URB6); (f) Shopfront improvements and funding programmes (see shopfront Supplementary Planning Document); and (g) A greater component of residential development within the town centre within the overall mix of uses (see LTC HSG4 and LTC HSG2 LTC COM1 and LTC BOM2).</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>LTC6D Make Lewisham a safer place</p>				<p>ensure policy is comprehensive.</p>
<p>LTC6E Support shopfront improvements and funding programmes</p>				
<p>LTC6F Allocate new sites for retail development</p>		<p>LTC SH3 – LEWISHAM MARKET The Council will continue to promote Lewisham Market as an essential part of the retail centre and encourage ancillary facilities in order to maintain its viability. The Council will investigate, in consultation with market traders, retailers and other town centre stakeholders, ways in which the Market can be improved, including the temporary use of the Market space for alternative activities (e.g. street food stalls or informal leisure activities) in the evenings and other times when the Market is not in use.</p>	<p>Retained with amendment</p>	
<p>LTC6G Encourage a greater mix of uses within the town centre including residential development (see LTC1)</p>				
<p>LTC6H Redevelop at key locations within the High Street to provide marker buildings with mix of uses.</p>				
<p>ISSUE LTC7: If implemented Lewisham Gateway has the potential to bring wide ranging benefits to the town centre. How should the AAP address the issues associated with Lewisham Gateway?</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC7A Allocate the Lewisham Gateway site for high density mixed use development.</p>	<p>It is considered that a combination of options LTC7A, C and D should be used to address the issues associated with Lewisham Gateway.</p>	<p>LTC SH4 – IMPACT OF LEWISHAM GATEWAY ON SOUTHERN PART OF THE TOWN CENTRE In order to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development the Council will promote the creation of a secondary focus of activity at the southern end of the pedestrianised High Street, incorporating a mix of uses.</p>	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>LTC7B Rely on existing development site allocations in the UDP to facilitate redevelopment of the roundabout site.</p>			Omitted	<p>CSP6 and CSSP2 provide a general indication of the need to maintain vitality and viability in relation to the town centre and retail frontages. LTC SH4 promotes a strategic response to the Gateway proposals and has incorporated within a re-cast SH2.</p>
<p>LTC7C Identify and allocate sites in the southern part of the centre for redevelopment in order to seek to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development.</p>				
<p>LTC7D Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime retail. This role might be a focus for community activity, with the library</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
representing an obvious stimulus for this type of activity. An alternative focus would be evening economy uses.			<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	LP = Draft London Plan CS = Emerging Core Strategy
ISSUE LTC8: What approach should the AAP take to the designations of core and non-core shopping frontages?				
LTC8A Maintain current distinction between core and non-core frontages as currently on the proposals map.	The preferred option for the approach to the designation of core and non-core shopping frontages in Lewisham town centre is derived from options LTC8B and C.	LTC SH5 – CORE PRIMARY SHOPPING AREAS Within the Core Shopping Areas, as defined on the Proposals Map and indicated in Figure 43 4, the Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions: (a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1 uses and 70% maintained in A1 use); (b) Whether the proposal will generate a significant number of pedestrian visits; and (c) Whether the proposal uses vacant units (having regard both to their number within the centre as a whole and the Core Area and the length of time they have been vacant).	Retained with amendment	Renamed Primary Shopping Areas. Para 6.93 of the Core Strategy confirms the Council's intention to identify primary and secondary shopping areas. Table 4.2 identifies current primary and secondary frontages in Lewisham town. CSP6 identifies the intention to designate primary and secondary areas.
LTC8B Review existing allocation of core and non core frontages				
LTC8C Introduce a geographical basis for designating retail zones with scope for integrating a more diverse mix of uses including evening economy.				
LTC8D Remove shopping frontage allocations and rely on town centre boundary.		All proposals for non retail development within Core Areas, including where relevant changes of use, should: (d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and (e) Where appropriate, provide attractive display windows		

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>and entrances that are compatible with adjoining shop units.</p> <p>LTC SH6 – NON-CORE SECONDARY SHOPPING AREAS Within the Non Core Shopping Areas, as defined in the Proposals Map, and indicated in Figure 43 4, proposals for development or change of use from an A1 shop will generally be acceptable provided:</p> <p>(a) It is to another A use class, community use or amusement centre where such a change does not result in an over-concentration of non A1 uses (normally 3 non A1 uses);</p> <p>(b) It does not harm the amenity of adjoining properties;</p> <p>(c) It does not harm the retail character (with reference to Policy LTC SH7), attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units; and</p> <p>(d) It is considered appropriate in relation to the area's specific retail character.</p> <p>LTC SH7 – RETAIL CHARACTER AREAS The town centre benefits areas of discrete retail character which, individually and collectively contribute positively to the vitality and viability of the centre. There are also areas where major retail led developments are anticipated and the retail character that they create will be an important consideration. Development proposals should take account of, not compromise and seek to complement existing and anticipated retail character of specific parts of the town centre as follows:</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>Retained with amendment</p> <p>Retained with amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Renamed Secondary Shopping Areas (see above)</p> <p>LTC SH7 provides a useful bridging point between area wide retail / vitality policies and guidance for individual character areas</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>1. Lewisham Gateway The retail character that should be aspired to in this area is a mixture of retail and leisure uses. Creation of an open space at the confluence of rivers provides opportunity for cafes, bars and similar uses.</p> <p>2. Lee High Road The western end of Lee High Road is a mixed use traditional high street with retail (A1 & A3) at ground floor and flatted accommodation above. Retailing on Lee High Road has a strong independent character and frontages are relatively short. There are already high concentrations of take-away and other non-retail uses and care will need to be taken to ensure over concentrations are not established.</p> <p>3. Loampit Vale North The retail character that should be aspired to at this 'edge of centre' location is for large retail units, with parking, to support primary shopping.</p> <p>4. Ladywell Road Ladywell is a mixed area with a good range of secondary retailing providing everyday servicing needs of the local area. Most commercial premises have shopfronts of traditional character. Ladywell Road is more residential in character, with several community uses and a limited number of commercial uses.</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
ISSUE LTC9: How should the town centre's potential for a more vibrant evening economy be managed?				
LTC9A	The preferred option for	LTC SH8 – CRITERIA FOR EVENING ECONOMY USES	Retained with amendment	Specific principles for

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
Do not provide a specific town centre policy approach.	the approach to managing the town centre's potential for a more vibrant evening economy is derived from options LTC9C and D	The Council will encourage proposals for new uses that would positively contribute to the evening economy of the town centre where the following criteria are met:	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	evening economy uses is required for the town centre to expand upon general policy guidance
LTC9B Maintain existing core and non-core frontage approach.		(a) The retail character of the area is not harmed (with reference to LTC SH8 7), and in particular the retail character of the core shopping area;		
LTC9C Encourage evening economy uses as part of a mix of uses in specified locations.		(b) The proposal would contribute positively to the character of the particular area, as outlined in the LTC SH8 7; and		
LTC9D Concentrate evening economy uses in a particular zone.		(c) The cumulative impact of the proposal does not unreasonably harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours.		
		It is considered that the following areas would be suitable locations for evening economy uses, as part of a wider mix of uses: (a) Lewisham Gateway (b) Lewisham High Street between Limes Grove and Morley Road (c) Ladywell (d) Lee High Road		
ISSUE LTC10: Should the town centre boundary be altered? LTC10A Maintain existing town centre boundary LTC10B Review town centre boundary to achieve a	The preferred option is LTC-10B with the removal of areas LTC-10B(iii) and LTC-10B(iv) from the town centre boundary.	LTC SH9 - TOWN CENTRE BOUNDARY The AAP boundary is defined as set out in the following plan (see main document):	No change	AAP requires clear definition of town centre boundary

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>tighter core by removing one or more of the following options:</p> <p>LTC10Bi) North-west corner of the town centre west of the DLR and north of the railway. The area around Armoury Road is former industrial land that was comprehensively redeveloped for housing in the 1980's. The area benefits from very good levels of public transport accessibility being within walking distance (via a railway arch opposite Jerrard Street) to Lewisham mainline and DLR stations and the numerous associated bus routes and Eiverson Road DLR station.</p> <p>LTC10Bii) Conington Road area east of the DLR and north of the railway. This mixed-use area is</p>	<p>These areas are predominantly residential and therefore are considered not to contribute positively to the centre's vitality and viability. As such the removal of the two areas will result in a tighter, more logical and defensible town centre boundary.</p>		<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>occupied by a large Tesco store and associated decked and surface car park, some industrial units on the east side of Conington Road and established residential housing blocks to the west. The area benefits from very good levels of public transport accessibility being within walking distance to Lewisham mainline and DLR stations and the numerous associated bus routes and Elverson Road DLR station.</p> <p>LTC10Biii) Area around Caterham and Boyne Roads, south of railway and north of Lee High Road. This established residential area is immediately to the east of the new divisional police station and to the north of the secondary shopping facilities along Lee High</p>			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>Road. The area falls within the Blackheath Conservation Area.</p> <p>LTC10Biv) Limes Grove Area – This established residential area lies on the immediate eastern side of Lewisham High Street north of the railway line.</p> <p>LTC10Bv) Southern end of the High Street south of the railway, towards Ladywell. The character and feel of the town centre changes south of the railway as one approaches Ladywell. This is a mixed part of town with the High Street presenting a range of secondary retail services together with the Ladywell Leisure Centre to the south. A large Council depot occupies land immediately to the south</p>			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>

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

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
levels of public transport accessibility provided by Lewisham Station.			<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	LP = Draft London Plan CS = Emerging Core Strategy
Urban Design				
ISSUE LTC11: What approach should be taken to the location and design of tall buildings in Lewisham town centre?				
LTC11A Retain exiting approach whereby tall buildings are considered appropriate in Lewisham town centre if the site is covered by a development brief identifying it as such.	Tall buildings are a useful way to achieving high densities, however it is important that their siting is managed effectively and that the highest quality architecture is emphasised, therefore the preferred option is a combination of options LTC11A and D. Where a site is not covered by a development brief which identifies it as a suitable location for tall buildings [LTC11A] the council should set out the specific criteria against which all developments for tall buildings will be considered [option LTC11D].	LTC URB1 – TALL BUILDINGS IN LEWISHAM TOWN CENTRE Planning applications for tall buildings may be permitted in Lewisham Town Centre subject to assessment of the following factors: (a) Design of tall buildings should be of the highest architectural quality; (b) The degree to which the proposal makes a positive response to urban setting and townscape; (c) Transport accessibility and impact of the proposal; (d) The visual impact of the proposed development on Strategic and Local views; (e) Effect on Listed Buildings themselves and the setting of Conservation Areas; (f) Effect on Metropolitan Open Land and other open spaces; (g) Relationship to existing tall buildings and structures; (h) Relationship with the town centre's topography; and (i) Impact on microclimate and overshadowing. All development applications for tall buildings must be accompanied by: (a) an environmental impact assessment; and (b) a design and access statement.	Omitted	CSP18 identifies Lewisham TC as a place where tall buildings will be directed to and sets out design criteria. The emerging proposals plan highlights local landmarks which are relevant in terms of views and legibility.
LTC11B Seek generally to encourage tall buildings in the town centre, removing the requirement for development brief endorsement.				
LTC11C Seek to encourage tall buildings in specific location(s).				
LTC11D Set out criteria against which all development for tall buildings will be considered, including				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>the requirement to demonstrate the highest quality architecture.</p> <p>OTHER POLICIES</p>			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
	<p>LTC URB2 – SUSTAINABILITY</p> <p>Development should be designed to achieve the best possible outcomes in terms of sustainable development through:</p> <p>(a) high density, mixed use developments with convenient pedestrian and cycle access to shops, services, community facilities and public transport facilities;</p> <p>(b) mix of residential tenures and unit sizes;</p> <p>(c) best use of Lewisham's natural resources, including its rivers;</p> <p>(d) developments that allow maximum flexibility in accommodating a range of uses over time;</p> <p>(e) innovative ways of reducing the need for private vehicles;</p> <p>(f) sustainable design and construction;</p> <p>(g) construction materials from sustainable resources and use of recycled and re-used materials;</p> <p>(h) incorporation of renewable energy;</p> <p>(i) protection and conservation of water supplies including minimisation of treated water, maximisation of harvesting opportunities and incorporation of grey water recycling systems;</p> <p>(j) sustainable urban drainage systems;</p> <p>(k) flood risk assessment, including adequate flood protection and mitigating measures where necessary;</p> <p>(l) Air Quality Impact assessment; and</p> <p>(m) Waste Management Plans for both construction and occupation stages.</p>		<p>Omitted</p>	<p>Core Strategy policies and other LDF documents cover the majority of these specific policy areas which are considered Borough-wide rather than AAP specific. The exception is carbon dioxide emissions which is a new issue.</p>
	<p>LTC URB3 - HIGH QUALITY DESIGN</p> <p>The Council supports a commitment to working with the highest quality architects and urban designers to ensure that the aspirations for these sites are realised.</p>		<p>Omitted</p>	<p>Covered in more detail by CSP15</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
	<p>Design competitions and partnership working will be encouraged to promote high quality design, particularly on key sites promoted through the opportunity area policies.</p> <p>LTC URB4 – MIXED USE An appropriate mix of compatible land uses will be encouraged both vertically and horizontally in Lewisham Town Centre. In particular, high density residential development above ground floor retail and commercial uses will be encouraged. Wherever possible, new development should be designed to accommodate active uses at ground floor level, with significant amount of window display and entrances.</p> <p>LTC URB5 - URBAN ENCLOSURE, GRAIN Urban enclosure and urban grain play a critical role in creating good quality environments and the following principles should be considered in any proposals for development:</p> <p>(a) Public spaces should be strongly defined by the built edges that surround them and groups of building should be designed to form unified urban 'backdrops'. (b) Existing street patterns should be respected and where possible extended in areas of new development. Single-use and overly long blocks should be avoided. (c) Buildings should front public spaces, and on major streets and public spaces 'backs' of properties should be avoided wherever possible.</p> <p>LTC URB6 - PUBLIC REALM Public spaces in Lewisham should be designed to be attractive, safe and robust through consideration of the following factors:</p> <p>(a) Unnecessary street clutter should be avoided, and where it is useful and functional, street furniture and lighting should be designed to delight. (b) The provision of public art in association with all major development in the town centre will be encouraged and should be considered at the early stages of the design process.</p>	<p>No change</p> <p>No change</p> <p>Retained with minor amendment</p>	<p>• No change • Omitted • Retained with amendment • New policy</p> <p>Specific guidance required for town centre</p> <p>Specific guidance required for town centre</p> <p>Specific guidance required – minor amendments incorporated</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>(c) Development should enhance community safety through the overlooking of entrances and exits and clear definition of public and private space. Developers should show how they have taken 'Secure by Design' into account with a view to 'designing out' crime.</p> <p>(d) New development and public space improvements should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes. Enhancements to connections between the town centre and surrounding residential communities are particularly important.</p> <p>(e) The Council will promote opportunities to make innovative use of existing and additional public realm areas as publicly accessible open space that can be used for recreation purposes and events and footways and civic spaces need to be generously sized, designed and managed accordingly.</p> <p>(f) Development should ensure that the public realm and development projects incorporate inclusive design principles. The Council will also seek to make provision for shopmobility initiatives.</p> <p>LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS In close liaison with the Environment Agency, new development in close proximity to the rivers should be designed to address the river positively, to create attractive waterfront environments, to respect and enhance natural habitats and to accommodate appropriate flood defences and should contribute to the physical environmental improvement of the river corridors.</p> <p>The Council will seek to protect and enhance the environs of the River Quaggy and the River Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate,</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p style="text-align: center; color: green;">New Policy</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Specific guidance required – minor amendments incorporated</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
	<p>the Council will support the de-culverting of rivers and programmes of naturalisation of riparian environments. Proposals should also respond positively to waterway heritage.</p> <p>The Council will seek to safeguard Waterlink Way, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency.</p> <p>The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park as shown in Figure 3.</p>		<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
Employment and Business				
ISSUE LTC12: What policy approach should be taken to existing established industrial areas and business uses in the town centre?				
<p>LTC12A Seek to retain existing employment uses in Lewisham town centre.</p> <p>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.</p> <p>LTC12C Seek to protect existing</p>	<p>The preferred option for employment land is a balanced approach which incorporates all options. This will allow for the protection of existing office and employment uses whilst being in line with government guidance and promoting the best use of land.</p>	<p>LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE</p> <p>In general, the Council will seek to retain existing employment uses in the town centre (uses falling within the category of Use Class B). However, in recognition of the opportunity to enhance vitality and viability of the town centre, the Council will consider redevelopment or conversion of the following employment sites for a mix of uses, including residential. It is envisaged that redevelopment proposals will enable the intensification of sites and as such there is an opportunity to re-provide employment floorspace as part of a wider mix of uses, including residential. Employment sites which will be considered for redevelopment include the following:</p>	<p>Retained with minor amendment</p>	<p>Important to keep this policy with minor amendments to reflect a more proactive statement of support for employment uses. Core Strategy Policy 2 identifies Molesworth Street as a Local Employment Location</p> <p>Core Strategy Policy 3 seeks to protect</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.</p> <p>LTC12D Seek to encourage the conversion of town centre accommodation to residential use.</p>		<p>(a) Former Beatties building (offices over ground floor retail); (b) Engate Street; (c) Thurston Road and Jerrard Street; (d) Conington Road; and (e) Citibank Tower.</p> <p>The conversion of other existing employment sites to a mix of uses including residential may be considered acceptable where:</p> <p>(a) the building has been vacant for at least 18 months 2 years and appropriately marketed for that length of time, and evidence is provided to this effect; and (b) the scheme will considerably assist in meeting other regeneration objectives such as:</p> <ul style="list-style-type: none"> - improvement to the vitality and viability of the town centre; - meeting the Borough's housing priority needs; and/or - the provision of community and leisure facilities within an accessible and socially inclusive location. <p>(c) The design is capable of longer term adaptation.</p> <p>LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE</p> <p>Lewisham Town Centre is the preferred location for large scale office development in the Borough and the Council will seek to promote new office development where</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>Local Employment Locations</p> <p>Core Strategy Policy 5(2) seeks to retain employment land in town centres which could contribute to a cluster of commercial and business uses</p>
			<p>Retained with minor amendment</p>	

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		appropriate. The Council will resist the loss of office space in the town centre with reference to the criteria identified in LTC EMP1. Where redevelopment entails the loss of office uses, proposals will be encouraged to re-provide this office space in a modern format.	<ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	LP = Draft London Plan CS = Emerging Core Strategy
Open Space				
LTC13: How should the AAP process seek to address open space provision within Lewisham town centre?				
LTC13A Retain existing open space provision.	All options are seen to have a role to play in ensuring the provision of high quality open space in Lewisham town centre and the preferred option is therefore a combination of these options.	LTC OS1 – RETENTION OF METROPOLITAN OPEN LAND In general, the open character of Metropolitan Open Land (MOL) will be protected. In exceptional circumstances such as those relating to Lewisham Gateway, the Council will consider the re-provision of and alteration to the boundary of MOL where the regenerative benefits arising will make a significant positive contribution to the quality of MOL and the vitality of Lewisham town centre in the context of its sub-regional status in the town centre network and the aspiration to attain Metropolitan status.	Omitted	LP and CS12 provide satisfactory general policy context.
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.		LTC OS2 – WATERLINK WAY AND CELEBRATING THE RIVER CONFLUENCE The Council will seek to safeguard Waterlink Way, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency.	Omitted	Repetition of Core Strategy Policy 12)

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

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
ISSUE LTC14: Should parking standards for new development be reviewed?				
LTC14A Retain existing standards for new development including retail development.	The preferred option for LTC14 is option B; to adopt London Plan standards for new development, including new retail development.	LTC TRS1 – LEWISHAM TOWN CENTRE PARKING STANDARDS The Council will seek to enhance the attractiveness of Lewisham Town Centre and reduce congestion in the area. New development should not exceed the maximum parking standards as set out in Table 3.2 and should seek to minimise parking where possible, taking account of:	Omitted	London Plan and LDF standards / policies apply
LTC14B Adopt London Plan standards for new development including retail development.		(a) the level of public transport accessibility in the town centre; (b) the aspiration to enhance sustainability in the town centre; and (c) pedestrian and cycle access.		
LTC14C Apply a more stringent approach than the standards set out in the London Plan.		Council will encourage multi-use parking including public use of private commercial car parking spaces. New development should seek to make provision for high standards of accessibility, storage and changing facilities for cyclists and pedestrians, including those with disabilities, in the town centre. The Council will require development to make provision for cycle parking in accordance with the standards set out in Table 3.2.		
ISSUE LTC15: In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?				
LTC15A Rationalise existing provision to encourage the use of public transport.	Notwithstanding the response received from the GLA, the preferred option is that the existing levels of public	LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE The Council will seek to retain the quantum of existing public /shopper parking spaces in the town centre as a minimum level. The Council will, where possible , also	Retained with amendment	Need a proactive and coordinated strategy in the context of the expansion of retail floorspace

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC15B Seek to retain existing levels of public parking.</p> <p>LTC15C Seek to increase provision of public parking.</p>	<p>parking in Lewisham town centre should be retained in line with option LTC15B. The option does have a degree of flexibility, and the draft policy interprets the retention of parking levels with respect to maintaining the proportion of parking in relation to the expansion of retail floorspace, which is in conformity with PPS6.</p>	<p>seek to broadly maintain the existing ratio of parking spaces to retail floorspace through a moderate increase in provision in line with an expansion in retail floorspace. The development of the following opportunity areas and sites will involve a significant amount of new retail floorspace and all existing and any new associated parking spaces should be publicly accessible.</p> <p>(a) Hartwell Ford site (b) Engate Street site (b) Conington Road Opportunity Area (c) Loampit Vale Opportunity Area (d) Ladywell leisure Centre</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>OTHER POLICIES</p>	<p>LTC TRS3 – CYCLING AND WALKING ROUTES Opportunities to enhance routes such as Waterlink Way, and to connect other parts of the town centre into the cycling and pedestrian network should be maximised.</p> <p>LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS The Council will support measures to improve the visual and pedestrian experience of the town centre, including at the following locations:</p> <p>(a) Northern roundabout; (b) Loampit Vale; (c) Lee High Road and Belmont Hill; (d) Lewisham High Street; (e) Molesworth Street; and (f) Southern roundabout and; (g) the junctions at Ladywell Road/Lewisham High Street/Courthill Road</p>	<p>No change</p> <p>Retained with amendment</p>	<p>Town centre specific statements required</p> <p>Town centre specific statements required</p>	<p>Repeats London Plan</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
	<p>LTC TRS5 – TRAVEL PLANS</p> <p>Developments that will have a significant transport impact (reaching or exceeding the thresholds set out in Table 3.3) will be required to submit a travel plan in order to reduce the impact of travel and transport on the environment. The Council will support car sharing and car club schemes and provision for alternative modes of transport to and any other schemes which challenge the use of private vehicles throughout the life of the proposed development. All other development proposals below the thresholds identified in Table 3 should be accompanied by a suitable commitment to encourage sustainable travel and the provision of sustainable travel information such as installing cycle parking, making public transport information available and promoting travel choices to staff members.</p>		<p>Omitted</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>policy 6.3</p>
Environment				
ISSUE LTC16: How can the AAP seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne?				
<p>LTC16A</p> <p>New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.</p> <p>LTC16B</p> <p>On the basis that there is no demonstrable harm to the river and its environment, contributions should not</p>	<p>The preferred option for issue LTC16 is option A. New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.</p>	<p>LTC ENV1 – PROTECT AND ENHANCE THE ENVIRONS OF THE RIVERS</p> <p>The Council will seek to protect and enhance the environs of the River Quaggy and the River Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the de-culvering of rivers and programmes of naturalisation of riparian environments.</p>	<p>Omitted</p>	<p>Repetition of CSP11 – incorporated within redrafted LTC URB7</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>be sought.</p> <p>OTHER POLICIES</p>	<p>LTC ENV2 - FLOOD PLAINS</p> <p>Development on the floodplain will not normally be permitted unless it can be demonstrated that the proposal would not, itself or cumulatively with other development:</p> <p>(a) impede the flow of water;</p> <p>(b) reduce the capacity of the flood plain to store flood water; or</p> <p>(c) increase the number of people or properties at risk from flooding.</p> <p>The Council support the provision of flexible spaces such as the proposed Cornmill Park on the Sundermead Estate which have the potential to act as attenuation pools in times of flood, and as open space at times of normal flow / discharge.</p>		<p>Omitted</p>	<p>Repetition of CSP10</p>
<p>Community and Leisure – No ‘issues’, just draft policies</p> <p>LTC COM1 – LEISURE CENTRE</p> <p>The Council is committed to providing one major leisure centre including a swimming pool in Lewisham town centre to replace the current Ladywell Leisure Centre. The new leisure facility should:</p> <p>(a) Be provided on a site well served by public transport;</p> <p>(b) Be provided in a building accessible to all;</p> <p>(c) Provide a range leisure and community facilities considered appropriate to meet local and Borough wide needs; and</p> <p>(d) Be a high quality, well designed, modern and energy efficient facility.</p> <p>LTC COM2 – A NEW SECONDARY SCHOOL FOR THE TOWN CENTRE</p> <p>The Council will consider the possibility of providing a new secondary school in Lewisham town centre. Should such a facility be required, it should:</p> <p>(a) Be provided in a site well served by public transport;</p> <p>(b) appropriate to meet local needs;</p> <p>(c) Provide the scope for the provision of shared community facilities of wider public benefit; and</p> <p>(d) Be a high quality, well designed, modern and energy efficient facility.</p>			<p>Omitted</p> <p>Omitted</p>	<p>Site at implementation stage, policy not required</p> <p>Considered as part of new Issue 18 (see below)</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC COM3 – RANGE OF COMMUNITY, LEISURE AND ENTERTAINMENT SPACES</p> <p>In order to contribute to town centre vitality, the Council is supportive of the provision of a flexible community spaces along with a range of leisure and entertainment uses in Lewisham Town Centre. In particular, the Council will be supportive of proposals for a cinema in the town centre, and a site at the northern end of the centre, such as the Lewisham Gateway site, is considered to be an appropriate location. The AAP is proactive in identifying opportunities for additional community and leisure facilities as follows:</p> <ul style="list-style-type: none"> • Refurbishment of the Playtower building on Ladywell Road into a multi-use community asset • Potential for further enhancement of the Leemore Resource Centre on Lee High Road. <p>The Loampit Vale Leisure Centre will provide a significant improvement in the provision of indoor sports and leisure facilities in the town centre, enabling the development of the Ladywell Leisure Centre site for other uses. The redevelopment of existing community, leisure and entertainment spaces will only be permitted if it can be demonstrated that:</p> <p>(a) the facility is no longer needed or an equivalent facility can be replaced at an alternative site with an equal or improved level of accessibility;</p> <p>(b) the locational requirements for the facility are not met;</p> <p>(c) the facilities need updating which cannot be achieved at a reasonable cost; and/or</p> <p>(d) alternative provision of equivalent benefit to the community is made.</p> <p>Opportunities also need to be maximised for the provision of enhanced/additional leisure and sports facilities in and around the town centre.</p> <p>LTC COM4 - MAJOR DEVELOPMENTS</p> <p>The Council may require major developments to prepare a social impact report to assess the health, education, leisure and community facility and infrastructure needs arising from a proposal.</p>		<p>Retained with amendment</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>Retained with amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>A relevant extension of policies of vitality and viability which is town centre specific</p> <p>This is a Borough-wide LDF issue, not town centre specific.</p>
<p>Implementation – No ‘issues’, just draft policies</p> <p>LTC IMP1 – MONITORING</p>		<p>Retained with amendment</p> <p>Continues to be a</p>		

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>The Council will facilitate the monitoring of the AAP through the following interventions:</p> <p>(a) Adherence to PPS64 recommendations for town centre healthcheck monitoring; (b) Liaison with the Town Centre Manager; and (b) Monitoring progress on planning applications. (c) Reporting progress on infrastructure delivery to the Asset Management Board and Sustainable Development Partnership; and. (d) The inclusion of a town centre specific section in the Annual Monitoring Report (AMR)</p> <p>The full monitoring framework including indicators, targets, trends and indicator sources, can be viewed in Appendix 4.</p> <p>LTC IMP 2 – COMPULSORY PURCHASE ORDER POWERS Where necessary, the Council will use Compulsory Purchase Order (CPO) powers to deliver agreed strategies in line with policies and site allocations of the Lewisham Town Centre Area Action Plan.</p> <p>LTC IMP3 – LEWISHAM TOWN CENTRE S106 POOLING AND PRIORITIES The Council will seek to facilitate the pooling of developer contributions to achieve a comprehensive and holistic approach to the regeneration of the town centre. In discussion with developers, the Council will expect contributions from new development to assist in achieving the following interventions:</p> <p>(a) public realm enhancements; (b) contributions to achieve comprehensive improvements in Opportunity Areas; (c) shopfront improvement grants; (d) appropriate town centre management initiatives; (e) community development projects including engagement exercises; (f) improvements to the Rivers and their environs, including naturalisation and ecological quality; (g) implementation of Waterlink Way; (h) funding of town centre community, health and leisure facilities and infrastructure needs resulting from major development; (i) employment and training support; (j) air quality management measures;</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p style="text-align: center;">Omitted</p> <p style="text-align: center;">Omitted</p>	<p>priority for the AAP</p> <p>Specific implementation options considered and reviewed as part of a new issue (issue 19)</p> <p>Specific implementation options considered</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>(k) traffic management measures, including pedestrian routes and facilities; and/or (l) public transport improvements.</p> <p>LTC IMP4 - PARTNERSHIP AND CONSULTATION In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the Statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites.</p> <p>LTC IMP5 – INFRASTRUCTURE AND SERVICES Development in Lewisham Town Centre will be required to contribute to the upgrading of utilities as necessary to support the development. Local improvements may be required to gas, electricity, water, telecommunications supplies and foul and surface water sewerage.</p> <p>LTC IMP6 - TRANSPORT CAPACITY Where development proposals will have a significant impact on highway or public transport networks, contributions may be sought in relation to:</p> <p>(a) increased line or station capacity on DLR and rail lines; (b) improved operating environment and facilities for buses; (c) enhanced pedestrian and cycle connections, particularly between development areas and the public transport interchange.</p> <p>LTC IMP7 – EDUCATION AND TRAINING SCHEMES Major development should contribute to education and training by incorporating schemes as part of their construction and ongoing operations. This may involve one or more of the following:</p> <p>(a) Employment opportunities and training schemes for local people in construction related industries associated with development; (b) Employment of local people in the ongoing enterprise; and/or (c) The development of training programme (from small scale work experience type activities through to formal educational programmes) associated with on-going enterprise.</p>		<p>Omitted</p> <p>Omitted</p> <p>Omitted</p> <p>Omitted</p>	<p>and reviewed as part of a new issue (issue 19)</p>	

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
New options, preferred options and policies (see main report for detailed overview)				
Issue 17: What opportunities are there for CO2 emission reduction in Lewisham Town Centre/ What role if any, should DE play in minimising CO2 emissions in Lewisham Town Centre? Is DE realistic and if so what options are there for delivering it?				
<p>Options:</p> <p>17A: Solar thermal (ST);</p> <p>17B: Photovoltaics (PV);</p> <p>17C: Wind turbines;;</p> <p>17D: Gas-fired CHP;</p> <p>17E: Biomass or bio-fuel fired CHP;</p> <p>17F: Air source heat pumps (ASHP);</p> <p>17G: Ground source heat pumps (GSHP); and</p> <p>17H: Decentralised energy</p> <p>Preferred option: Composite – 17A, 17B, 17D and 17H</p>				
New Policy 1: Carbon Dioxide Emission Reduction in Lewisham Town Centre				
Issue 18: What social infrastructure is required to support the projected growth in the town centre during the plan period?				
<p>Options:</p> <p>18A: Increase primary school capacity</p> <p>18B: Increase secondary school capacity</p> <p>18C: Specific childcare approach</p> <p>18D: Increase primary health care provision</p>				
Preferred option: Composite of all options				
New Policy 2: Social infrastructure				

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

Table 2: Site-specific policies

Preferred Option		Policy Title	Comments	Proposed changes
Policy Reference				
LTC OPP0	Opportunity Area Policies	Not required – dealt with by Core Strategy	Omitted	
LEWISHAM GATEWAY				
LTC OPP1	Lewisham Gateway Opportunity Area	Not required – dealt with by Core Strategy	Omitted	
LTC OPP1a	General principles for Lewisham Gateway	Not required – dealt with by Core Strategy	Omitted	
SITE SPECIFIC POLICY 1.1	Kings Hall Mews	New site – sensitive location adjacent to Gateway scheme	New policy	
LEWISHAM CENTRE				
LTC OPP2	Lewisham Centre and adjoining land	Different geographical coverage and scope of proposals	Retained with amendment as Character area policy 6	
LTC OPP2a	Entrance and routes	Shopping centre unlikely to come forward for redevelopment	Omitted	
LTC OPP2b	Urban form	Shopping centre unlikely to come forward for redevelopment	Omitted	
LTC OPPc	Public realm	Scale of changes unlikely to take place	Omitted	
LTC OPPd	Vehicular servicing and parking	Shopping centre unlikely to come forward for redevelopment	Omitted	
LTC OPP2e	Molesworth Street frontage	Considered unlikely to be implemented	Omitted	
LTC OPP2f	Land south of the shopping centre	Still relevant	Retain but with amendments as Site-Specific Policy 6.2	
LTC OPP2g	Land north of the shopping centre	Still relevant	Retain but with amendments as Site-Specific Policy 6.1	
LTC OPP2h	Molesworth Street surface car park site	Site retained as car parking	Omitted	
LTC OPP2i	Citibank Tower	Aspirations still apply	No change (now, Site Specific Policy 6.4)	
LTC OPP2j	Lewisham High Street and market	Not required. Points are covered in other policies	Omitted	
LEE HIGH ROAD				
LTC OPP3	Lee High Road	Largely still appropriate	Retained with amendment as Character area policy 4	
LTC OPP 3a	Lee High Road western end	Largely still appropriate notwithstanding	Retain but with amendments as Site-Specific Policy 4.1	

Preferred Option		Policy Title	Comments	Proposed changes
Policy Reference				
LTC OPP3b	Lee High Road eastern end	planning permissions granted recently		
LTC OPP3c	Clarendon Green	Scheme built		Omitted
LOAMPIT VALE		Retention of Clarendon Rise car park		Omitted
LTC OPP4	Loampit Vale	Given progress on many sites this policy is now in need of review		Retained with amendment as Character area policy 2
LTC OPP4a	Loampit Vale South – a mixed use urban street	On site		Omitted
LTC OPP4b	East side of Elmira Street	On site		Omitted
LTC OPP4c	West of Elmira Street	On site		Omitted
LTC OPP4d	Thurston Road opportunity	Replaced by sub-area wide policy		Omitted
LTC OPP4e	Land west of Jerrard Street	Review and note that consent already granted		Retain but with amendments as Site-Specific Policy 2.2
LTC OPP4f	Land east of Jerrard Street	Review		Retain but with amendments as Site-Specific Policy 2.1
LTC OPP4g	Railway strip	Retain policy		Retain but with amendments as Site-Specific Policy 2.3
CONNINGTON ROAD				
LTC OPP5	Connington Road			Retained with amendment as Character area policy 3
LTC OPP5a	Northern Link			Omitted
LTC OPP5b	Tesco block	Still largely relevant although subject to change following discussions with Tesco and recent design work		Retain but with amendments as Site-Specific Policy 3.1
LTC OPP5c	Car park and petrol station			Omitted – incorporated in site specific policy 3.1
ENGATE STREET				
LTC OPP6	Engate Street	No longer considered appropriate		Omitted
LTC OPP6a	Engate Street mixed use block	No longer considered appropriate		Omitted
LADYWELL ROAD				
Character area policy 5	Ladywell Road character area	New character area to respond to evolving site context		New policy
Site Specific Policy 5.1	Ladywell Leisure Centre Site	New site subject to options testing and development		New policy

Appendix 4

Monitoring framework

The following table sets out each of the 37 draft policies outlined in the AAP Further Options Report and details the objectives that each will help deliver. In the draft AAP (due for public consultation in spring 2012) indicators and associated targets will have been identified for every proposed policy to form a monitoring framework for the draft plan.

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
LTC HSG3 – CONVERSION OF EXISTING BUILDINGS			
Objective 2 - Housing	Net gain of housing units (and loss of commercial floor space) from completed conversions	No net loss of housing	Core Strategy / AAP monitoring
Objective 4 - Employment and training			AMR
LTC SH2 – VITALITY AND VIABILITY			
Objective 1 - Retail and town centre status	Implementation of Lewisham Gateway proposals	Started by 2016	Core Strategy / AAP monitoring
Objective 2 - Housing	Delivery of public realm enhancements	Delivery in accordance with the IDP and AAP delivery timetable	Core Strategy / AAP monitoring
Objective 4 - Employment and training	Amount of retail floor space delivered	40,000sqm by 2021	AMR
Objective 5 - Open space/recreation	Amount of residential units delivered	2,300 by 2016 A further 800 by 2021	AMR
Objective 8 - Community	Delivery of community and leisure facilities	No net loss	Core Strategy / AAP monitoring
	Amount of employment / office space provided	No net loss	AMR
LTC SH3 – LEWISHAM MARKET			
Objective 1 - Retail and town centre status			
LTC SH5 – PRIMARY SHOPPING AREAS			
Objective 1 - Retail and town centre status			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
LTC SH6 – SECONDARY SHOPPING AREAS			
Objective 1 - Retail and town centre status			
LTC SH7 – RETAIL CHARACTER AREAS			
Objective 1 - Retail and town centre status			
LTC SH8 – CRITERIA FOR EVENING ECONOMY USES			
Objective 1 - Retail and town centre status			
Objective 8 - Community			
LTC SH9 - TOWN CENTRE BOUNDARY			
Objective 1 - Retail and town centre status			
Objective 2 - Housing			
LTC URB4 – MIXED USE			
Objective 1 - Retail and town centre status			
Objective 2 - Housing			
Objective 3 - Sustainable design			
Objective 4 - Employment and training			
LTC URB5 - URBAN ENCLOSURE, GRAIN			
Objective 2 - Housing			
Objective 3 - Sustainable design			
Objective 5 - Open space/recreation			
LTC URB6 - PUBLIC REALM			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
Objective 5 - Open space/recreation			
LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS			
Objective 7 - Environment			
LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE			
Objective 4 - Employment and training			
LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE			
Objective 4 - Employment and training			
LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE			
Objective 1 – Retail and town centre status			
Objective 6 - Transport			
LTC TRS3 – CYCLING AND WALKING ROUTES			
Objective 6 - Transport			
LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS			
Objective 5 - Open space/recreation			
Objective 6 - Transport			
LTC COM3 – RANGE OF COMMUNITY, LEISURE AND ENTERTAINMENT SPACES			
Objective 5 - Open space/recreation			
Objective 8 - Community			
LTC IMP1 – MONITORING			
Objective 9 - Implementing and			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
monitoring the AAP			
NEW POLICY 1 – CARBON DIOXIDE EMISSION REDUCTION IN LEWISHAM TOWN CENTRE			
Objective 3 – Sustainable design			
Objective 7 - Environment			
NEW POLICY 2 – SOCIAL INFRASTRUCTURE			
Objective 2 - Housing			
Objective 5 - Open space/recreation			
Objective 8 - Community			
NEW POLICY 3 – IMPLEMENTATION.			
Objective 9 - Implementing and monitoring the AAP			
SITE SPECIFIC POLICY 1.1: Kings Hall Mews			
All objectives			
CHARACTER AREA POLICY 2: Loampit Vale character area			
All objectives			
SITE SPECIFIC POLICY 2.1: Loampit Vale North – east of Jerrard Street			
All objectives			
SITE SPECIFIC POLICY 2.2: Loampit Vale North – west of Jerrard Street			
All objectives			
SITE SPECIFIC POLICY 2.3: Railway strip			
All objectives			
CHARACTER AREA POLICY 3: Conington Road character area			
All objectives			
SPECIFIC POLICY 3.1: Tesco block and car park land			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
All objectives			
CHARACTER AREA POLICY 4: Lee High Road character area			
All objectives			
SITE SPECIFIC POLICY 4.1: Lee High Road western end			
All objectives			
CHARACTER AREA POLICY 5: Ladywell Road character area			
All objectives			
SITE SPECIFIC POLICY 5.1: Ladywell Leisure Centre site			
All objectives			
CHARACTER AREA POLICY 6: Central area character area			
All objectives			
SITE SPECIFIC POLICY 6.1: Land north east of the shopping centre			
All objectives			
SITE SPECIFIC POLICY 6.2: Land south of the shopping centre			
All objectives			
SITE SPECIFIC POLICY 6.3: Citibank Tower			
All objectives			

Appendix 5

Schedule of changes to the Proposals Map

The inclusion of the recommended options from this Further Options report in a draft AAP and subsequent adoption of such policies would require a number of amendments to be made to the existing UDP Proposals Map, July 2004. These potential changes are detailed in the table below.

For the draft AAP, a set of inset maps will be produced to accompany the draft schedule and illustrate the required changes.

Schedule of required changes to the proposals map:

Proposals map elements	Required change
Major / District Centre	Reduction in boundary size as detailed in recommended policy option LTC SH9
Local Landmarks	<p>2 additional local landmarks as identified in the Local Development Framework evidence base – tall buildings study.</p> <ul style="list-style-type: none"> • St Johns United Reformed Church • St Saviours RC Church <p>Detail of the new designations can be found in recommended policy options XXX XXX and XXX XXX</p>
Development Sites	<p>Wholesale changes are required to the designation of development sites within the town centre boundary.</p> <p>The following sites were included in the UDP proposals map 2004 and are no longer required:</p> <ul style="list-style-type: none"> • UDP Site 24 – Development complete • UDP Site 34 – Development complete • UDP Site 35 – Development commenced • UDP Site 36 – Development complete • UDP Site 37 – Remove and replace with Lewisham Gateway scheme identified in the Core Strategy as Strategic Site Allocation 6 • UDP Site 38 – Development complete • UDP Site 39 – Remove and replace with Lewisham Gateway scheme identified in the Core Strategy as Strategic Site Allocation 6 • UDP Site 42 – Development complete <p>The following sites were included in the UDP proposals map 2004 and require boundary amendments:</p> <ul style="list-style-type: none"> • UDP Site 40 – Site partially developed, reduce boundary to limit of surface car park as detailed in the site specific policy for Molesworth Street car park. • UDP Site 40A – Amend site boundary to conform with site specific policy for Land South of the Shopping Centre.

	<p>The following sites were not included on the UDP proposals map 2004 and will require addition as a result of inclusion in the AAP:</p> <ul style="list-style-type: none">• <i>List of all finalised sites when complete and agreed</i>
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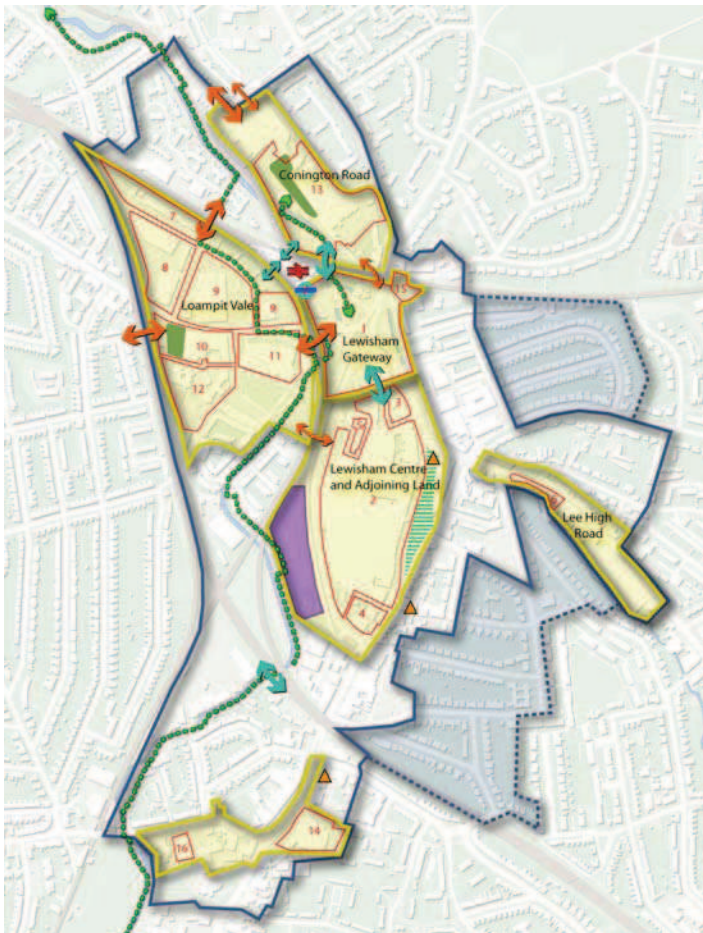
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Sustainability appraisal and strategic environmental assessment

Lewisham Town Centre Area Action Plan - Further Options Report
January 2011

Copy for Mayor and Cabinet



Produced for Lewisham Borough Council By



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Non-technical summary

This section is a non-technical summary of the Sustainability Appraisal and Strategic Environmental Assessment (SA) of the Lewisham Town Centre Area Action Plan (AAP) Further Options Report. It summarises the stages of the SA process, provides a statement of likely significant effects arising from the proposals contained in the AAP and shows how the process has made a difference to date. This SA report should also be read in conjunction with the SA produced for the Preferred Options Town Centre AAP in April 2007, as information from this report has not been reproduced here, but is still referred to, and relevant in places.

What is a sustainability appraisal?

Government legislation requires the Council to carry out a Sustainability Appraisal (SA) of all the documents which make up the Local Development Framework (LDF). The Lewisham Town Centre AAP document is technically known as a development plan document (DPD) and is a key LDF document in identifying and designating land in Lewisham Town Centre for particular uses (such as housing, retail, employment, education, or a mix of uses) building on the regeneration and growth agenda for the area set out in the Core Strategy. The Core Strategy is the main town planning strategy for Lewisham and sets out the vision, objectives and policies to guide development and change in Lewisham over the next 15 years. The purpose of a SA is to make sure that all the things which are referred to as sustainability issues such as using public transport not the private car, the impact of flooding or climate change, or the pressures placed on open space from an increasing population, are taken into account when preparing the AAP. The idea is that once adopted, the DPD will be the most sustainable that can be put forward as it will have taken into account all the sustainability issues as part of the process of preparation. In addition to the Government's requirement for SA, the Council is required under European Directive to undertake a Strategic Environmental Assessment (SEA) of new plans. Government guidance considers it appropriate to combine both assessments through a single approach. The Council's report therefore integrates both SA and SEA and is referred to by the single term 'sustainability appraisal'.

The SA:

- assesses the broader sustainability impacts of the emerging AAP
- shows how sustainability and sustainable development was defined and understood for the purposes of this assessment
- minimises the negative impacts associated with the emerging AAP while putting forward ways to enhance the benefits that could be achieved.

Sustainability Appraisal is not a precise science. It involves a balance of value judgements about how the environment we live in should look and function. While some people may place a high value on the quality of the natural environment, others may strive for a healthy economy or a strong sense of community. It is the Council's task to find a balance between these sometimes conflicting goals.

Progress so far

The government has set out the methodology to carry out the SA process in good practice guidance and identifies the following stages:

Stage A Setting the context and objectives, establishing the baseline and deciding on scope

Stage B Developing and refining options and assessing effects

Stage C Preparing the SA report

Stage D Consulting on the preferred options of the DPD and the SA report

Stage E Adoption and monitoring plans

This SA report for the Site Allocations Further Options Report reflects Stage B. Since the good practice guide was published in 2005 the government has revised the rules for producing a DPD. The new rules are set out in a publication called *Planning Policy Statement 12 Local Spatial Planning* (PPS12) published in June 2008. This has changed Stage D so that this stage now relates to a SA for a draft plan (or proposed submission version). Importantly, the SA methodology reflects the Plan Making Manual, which considers the updated PPS12.

Lewisham Town Centre AAP Further Options report and its sustainability appraisal
The following objectives have been derived utilising the results of the review of policy, programmes and objectives. The objectives have been organised by theme, to ensure that the AAP covers the full scope of issues and topics defined by statutory documents in the planning framework and contextual strategic documents. The amended objectives will then feed into the Issues/Options phase and the parallel Sustainability Appraisal process

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

- **Objective 1 - Retail and town centre status:** To support and improve the vitality and viability of Lewisham town centre by enhancing distinctive features such as the street market and achieving Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space and improved leisure floorspace
- **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 accessibility.
- **Objective 3: Sustainable Design:** To apply consistently high standards of sustainable urban design and construction to individual sites to ensure that developments make the best use of natural resources, 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 retaining/re-providing employment generating uses, the redevelopment of key sites throughout the centre for a range of non-residential uses, including offices and the enhancement of training opportunities.

- **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 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 place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of educational, 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.

The **sustainability appraisal objectives** have been tailored to reflect local concerns as well as national and regional issues. The sustainability appraisal framework may also serve as the basis for monitoring eventual implementation of the Area Action Plan.

The proposed sustainability appraisal objectives are as follows:

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 utilise the historic environment in the creation of sustainable places
Soc6	Culture	To protect and enhance cultural diversity and promote

Ref	Topic	Sustainability Appraisal Objectives
		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
Env 2	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
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 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		

Ref	Topic	Sustainability Appraisal Objectives
Eco1	Retail offer	To increase the diversity of the retail offer
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy
Eco 3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment
Eco3	Local business	To increase density of local business
Eco4	Employment opportunities	To increase access to local employment and reduce local unemployment

Key findings

The SA process identified that the AAP was likely to result in a number of social, economic and environmental benefits. The main benefits were in association with the proposals to provide new housing and retail within the town centre. This will contribute positively towards the sustainable economic growth SA objectives and also contribute towards securing additional affordable housing in a location which has excellent public transport links (Lewisham Town Centre has a PTAL score of 6 on average). The AAP policies seek to diversify retail uses and to improve the public realm significantly which will help to make the town centre environmentally and economically resilient in the future.

The town centre is affected by flood risk, with large parts classified as high or medium risk of flooding. Development of new housing within high risk flood areas is proposed as part of the AAP and this conflicts with the SA objective to reduce the risk and effects of flooding (ENV2). However the proposals would have significant regeneration benefits and would help to fulfil Lewisham's wider economic and social objectives, in particular, the achievement of Metropolitan retail status. Lewisham's Sequential Test has indicated that there are no alternate locations for the scale and type of development proposed, therefore exception tests will need to be undertaken to ensure that the final proposals are acceptable in terms of flood risk. The policies also require that flood mitigation measures are included in the design of development and that the Council liaise closely with developers.

Another potential conflict identified was in terms of parking provision. Policies seek to retain the amount of parking for shoppers in the town centre and increase provision in relation to any new retail development. This conflicts with the sustainability objective to encourage sustainable modes of transport. However, easy access to parking is a key advantage to Lewisham town centre which can differentiate its offer with other nearby competing retail centres, therefore it is considered essential to retain as much parking as possible.

Two of the key developments proposed in the AAP involve the loss of Metropolitan Open Land (MOL). However the quality and function of this MOL is limited, and the loss of the land is mitigated through the reprovision of open space. The loss of MOL at

these sites has been considered and appraised in detail as a separate process to this work.

Statement on the difference the process has made

The SA process was carried out in parallel to the plan making process (the preparation of the Further Options Report) therefore all findings during this process were integrated into each round of discussion and are reflected in the final version of the FOR AAP report.

By developing and consulting on both the AAP and the SA together, environmental, social and economic considerations have been integrated throughout the process. Given this, the SA has generally confirmed that thinking on sustainability issues is well embedded with the preparation of the AAP. More generally, the SA process has produced substantial benefits in the plan-making process through the further development and assessment of the baseline, identification of indicators and targets and identification of significant benefits.

The SA has highlighted the need for partnership working to improve the provision of infrastructure (physical, social, green), particularly in relation to responding to the needs of the local communities and disadvantaged groups. The need to monitor policies, set targets and identify indicators is an important part of the SA process. This will show whether the wider environment of Lewisham is improving or worsening, and thus enable amendments to be made to AAP policies. One of the overall benefits of integrating the SA process with AAP formulation will be the potential to identify and respond to changes in the wider environment quickly.

How to comment on this report

You can tell us what you think about any part of this Sustainability Appraisal report. Comments must be in writing and can be made in any of the following ways:

Web

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

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

OR

E-mail

planning@lewisham.gov.uk
with 'LDF AAP Further Options Report' as the subject.

OR

Post

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

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

Please send comments by: 5pm on (To be confirmed).

It may not be possible to take account of comments that are received after this date

1. Introduction

This document is the Sustainability Appraisal and the Strategic Environmental Assessment (SA) of the Lewisham Town Centre Area Action Plan (AAP) Further Options Report. The AAP seeks to deliver the vision and strategic objectives identified for the town centre by identifying sites for redevelopment and providing clear policy and guidance for land owners and developers. This SA appraises proposed uses for the key focus areas and includes an appraisal of:

- Objectives
- Area wide spatial policies
- Focus areas

This SA report supplements the SA report produced in April 2007 on the Preferred Options Lewisham Town Centre AAP, and this document should be read in conjunction with this report.

1.1. Lewisham Local Development Framework

The preparation of a **Sustainability Appraisal for the emerging Lewisham Town Centre Area Action Plan** is part of the process prior to its development and adoption as a Local Development Document as part of Lewisham's Local Development Framework.

Local Development Frameworks

Local Development Frameworks (LDFs) 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 are being prepared:

- Core Strategy
- Site Allocations DPD
- Development Management Policies DPD
- Area Action Plans for the Lewisham and Catford town centres
- Proposals Map
- Supplementary Planning Documents
- Statement of Community Involvement
- Annual Monitoring Report
- Local Development Scheme

DPDs are subject to consultation during the preparation period and are required to be examined by an independent planning inspector. All DPDs are subject to SA. The Core Strategy forms the principal, overarching LDF document and all other LDF documents must be consistent with it. The Core Strategy sets out the vision, strategic objectives, spatial strategy, cross cutting policies and the delivery and monitoring strategies for the borough, taking into account the requirements of national legislation and policies, and regional statutory requirements, specifically those in the London Plan. The London Borough of Lewisham has been actively engaged in developing its LDF since 2005.

1.2. Lewisham Town Centre Area Action Plan

Lewisham Council are preparing an Area Action Plan for Lewisham Town Centre to ensure the forecast growth for the town centre is managed and delivered. Spatial Objective 2 of the emerging 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 floodspace by 2026
- c. Accommodate up to 1,500 additional new homes by 2016 and a further 1,100 additional new homes by 2026 (NB: These figures are currently being revised to reflect the updated Further Options Report findings)
- 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.

A number of documents and studies set the scene for the preparation of the Lewisham Town Centre Area Action Plan. These include the Lewisham UDP, the emerging Lewisham Core Strategy, the London Plan, the draft replacement London Plan, the Lewisham Gateway SPG and the draft Lewisham Town Centre Development Strategy.

1.3. Sustainability Appraisal

The purpose of an SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans.

The Government defines sustainable development as:

- Social progress which meets the needs of everyone;
- Effective protection of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

The SA of planning documents is intended to achieve the following:

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

1.4. Strategic Environmental Assessment

The SA of planning documents must also incorporate (where relevant) the requirements of the European Directive 2001/42/EC on the 'assessment of the effects of certain plans and programmes on the environment', commonly referred to as the Strategic Environmental Assessment (SEA) Directive.

SEA focuses exclusively on environmental issues, whilst the broader SA focuses on social and economic issues in addition to environmental issues. Government guidance on undertaking SAs has been prepared so as to accommodate the requirements of the SEA Directive. Consistent with this approach, the preparation of the SA of the emerging Lewisham Area Action Plan DPD will address the requirements of the SEA Directive.

1.5. European Habitats Directive

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. The Council has carried out this assessment which concludes that the Core Strategy and strategic land allocations, including the vision for Lewisham Town Centre are not likely to have a significant effect on any designated European sites. The AA is contained as Appendix 2 to the SA for the Core Strategy Report.

1.6. The Sustainability Appraisal Process

The five key stages of the SA (incorporating SEA) are shown in Figure 1 below.

<i>STAGE & OUTPUT</i>	<i>LINKAGES TO PLAN PREPARATION</i>	<i>PURPOSE</i>
<u>STAGE A</u> SCOPING REPORT	Formulated alongside the preparation of the evidence base.	Identify relevant plans and programmes; Establishing the baseline; Setting a framework; Deciding on the scope of the appraisal setting objectives and targets; and Identifying issues.
<u>STAGE B</u> Developing & Refining Options	Formulated alongside the preparation of issues and options.	Refining issues and options for the plan; and Appraise the sustainability of the options.
<u>STAGE C</u> Draft SA Report	Formulated alongside the preparation of the preferred options. Consultation on both will take place at the same time.	Identify preferred options; Assessing the effects of the plan (economic, social and environmental); and Developing proposals for monitoring the plan.
<u>STAGE D</u> Final SA Report	Formulated alongside the preparation of the submission version. Consultation on both	Appraising significant changes to the plan arising out of consultation undertaken in Stage C; and

<p>STAGE E Annual Monitoring Report</p>	<p>will take place at the same time (Stage D).</p> <p>The sustainability of the Site Allocations DPD will be reviewed as part of the Annual Monitoring Report.</p>	<p>The SA to be used as part of determining the 'soundness' of the plan and whether it should be approved or not.</p> <p>Monitoring implementation of the plan.</p>
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Figure 1. Development Plan Document Preparation Process

Sustainability appraisal is an ongoing process and to enable it to be effective and worthwhile the appraisal must start early in the plan preparation process. By doing so, sustainability considerations can be effectively factored into the plan from its earliest stages. Two phases and associated consultations have informed this current SA of the Council's Lewisham Town Centre AAP Further Options Report. 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. This was subject to the statutory five week consultation period with the statutory consultees. Six replies were received, however two of these offered no specific comments relating to the AAP. The feedback received from the remaining four consultation responses has been incorporated into this SA Report for the Site Allocations Further Options Report. New issues identified as a result of the consultation can be found in Section 6 and in detail in Appendix 4, while the impact upon the sustainability objectives can be seen in Section 7.

An SA/SEA Preferred Options report was produced in 2007 which assessed the 2007 Preferred Options AAP DPD. Work on the AAP was paused to allow for the progression of the Core Strategy. Following this the Council has produced a Further Options AAP report which is an updated version of the AAP and reflects more recent developments in the Core Strategy and on the ground. Therefore this SA report assesses this new report accordingly.

1.7. Next steps

Following the publication of this SA on the Further Options Report for Lewisham Town Centre AAP, the Sustainability Appraisal will inform and develop in step with production of the Area Action Plan as follows:

- Consultation on the revised Sustainability Appraisal (coinciding with consultation on Further Options Report for the Area Action Plan)
- Final Submission version of the Sustainability Appraisal Report
- Consultation on the Submission version of the Sustainability Appraisal Report (coinciding with consultation on the Submission version Area Action Plan)
- Monitoring and Review.

1.8. Consultation on the Sustainability Appraisal

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

The SEA Directive gives rise to specific requirements for consultation with the public and stakeholders. It requires authorities to consult "the public affected or likely to be affected by, or having an interest in" a plan. It also gives rise to the requirement that authorities which, because of their social, environmental and economic responsibilities, are likely to be concerned by the effects

of implementing the plan must be consulted on the scope and level of detail of the information to be included in the SA Report.

In the SEA Regulations the Government has designated three consultation bodies as “authorities with environmental responsibility” (or “consultation bodies”), in relation to the SEA Directive:

- English Heritage,
- Natural England, and
- the Environment Agency.

In Lewisham, additional bodies have been designated as “specific consultation bodies” and have therefore been consulted.

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

As explained in sections 1.3 “Sustainability Appraisal” and 1.4 “Strategic Environmental Assessment”, this document is intended to meet both the requirement for a Sustainability Appraisal and the requirements of the SEA Directive.

1.9. Methodology and structure of this report

The Government has set out the methodology and statutory requirements for carrying out the SA process in regulations and an associated guide. This SA has been prepared and structured in accordance with these regulations and guidance. This SA report focuses on the assessment of amended and new policies against the revised sustainability objectives set out in the SA Scoping report. The following scale was used to determine the nature of the impacts of the AAP.

++	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

The impact assessment was qualitative and effects were determined based on professional judgement.

The SA report is structured in the following manner:

Section 1 provides an introduction and explains the SA process

Section 2 outlines the context and relevant aspects of the current state of the environment in Lewisham (termed as the ‘baseline’)

Section 3 sets out the Lewisham Town Centre Vision and Objectives

Section 4 shows the main plan and programme documents reviewed

Section 5 summarises issues raised at previous consultations

Section 6 provides a summary of the key sustainability issues facing the borough

Section 7 Sustainability Appraisal Objectives

Section 8 AAP options and alternatives

Section 9 Appraises the AAP and likely significant effects and includes assessment of options in terms of the likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects on a number of sustainability related matters; measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. This section also includes cumulative and long term effects

Section 10 outlines proposals for monitoring

Section 11 provides information on the next steps.

1.10. Difficulties in carrying out the assessment

Difficulties were encountered in compiling the baseline information and setting the appropriate indicators and targets, as this information was not always available or easy to predict. Much of the baseline information used for this appraisal has been taken from higher level SA reports undertaken for the Core Strategy and Site Allocation Reports. The SA process revealed that there is a lack of monitored data available to establish a baseline of information. Information had to be sourced from a number of locations. The recent update of the Scoping Report has made the baseline information more reliable, however there are still gaps in information available.

2. Lewisham Town Centre Context

This section introduces the Lewisham Town Centre area, for which the action plan is being prepared and summarises the strategic and local context. The provision of information detailing the current state of the social, economic and natural environment in the Lewisham Town Centre area constitutes a baseline against which the effects of the AAP can be monitored and is a fundamental part of the Sustainability Appraisal process. Baseline information also provides the basis for predicting the likely environmental effects that may result both if the AAP is or is not implemented. The clear identification of the baseline and likely future trends is essential to the SA process as it facilitates the development of sustainability objectives that can address ways of mitigating against anticipated problems and in developing an effective and transparent monitoring strategy to measure progress in the achievement of effective implementation of the AAP. The following section provides an outline of the current social, environmental and economic baseline characteristics of the area and their likely trends if the AAP is not implemented. A detailed list of the current baseline and associated indicators and trends is provided at appendix 4.

2.1. Location

The London Borough of Lewisham covers around 13.4 square miles, located in south east London. It is a vibrant and ethnically diverse borough, home to more than 260,000 people.

The borough is made up of a collection of diverse neighbourhoods and strong communities ensuring that while the borough and its localities develop, they maintain their unique identities and preserve Lewisham's rich natural and architectural heritage. Adjoined by four other London boroughs, Lewisham occupies a key position on important transport routes (radial and orbital) within London and between central London, Kent and Sussex.

Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area stretching east to the Kent and Essex coasts along the Thames Estuary. Lewisham, Catford, New Cross and Deptford are identified as opportunity areas in the London Plan and are expected to be able to accommodate substantial new jobs and or homes.

Lewisham Town Centre is especially well connected to central London by rail and the DLR and benefits from high PTAL of 6b and 6a. It has developed as an important dynamic and strategic retail and service hub and is designated as a Major Centre within the London Plan. Lewisham offers a variety of appeal including the historic street market, comparison goods retail in the Riverdale Shopping Centre and independent specialist retail along the Lee High Road. Employment in the town centre is largely split between Distribution, Hotels and Restaurants (largely retail) providing 30% of total jobs, Banking, Finance and Insurance providing 27% and Public Sector (administration, education and health) accounting for 26%.

The Indices of Multiple Deprivation show that the area covering Lewisham town centre is among the 20% most deprived areas within England. While educational and health factors demonstrate a mid-table ranking, the indices relating to crime, environment and those affecting children and old people remain in the bottom quintile.

The borough is the 15th most ethnically diverse local authority in England where 130 different languages are spoken. This diversity is apparent in the town centre with the proportion of the overall population from a black and/or minority ethnic origin at 47%.

The town centre has 3 primary schools within and close to its boundary including Lewisham Bridge Primary School, which is currently being transformed into the Prendergast vale all-through school, and a total of 23 primary schools in the two Primary Places Planning Localities (PPPLs) that cover the town centre. There are also 2 secondary schools nearby which have benefitted from the Building Schools for the Future (BSF) Programme to rebuild or refurbish every secondary school in the borough within the next decade. Health facilities are provided by 6 GP's and 4 dentists close

by and the Lewisham University Hospital located immediately south of the centre providing acute services and a children's centre. In supporting the area Lewisham has a number of community and leisure facilities, while there are also many independent faith group facilities.



. Figure 4: Proposed Area Action Plan boundary

The borough has a wide portfolio of parks and green spaces, whilst within the town centre open space is provided through a mix of green and hard landscaping. Additionally, there is a Site of Importance to Nature Conservation and a number of green corridors that permeate the outskirts of the centre.

The River Ravensbourne and the River Quaggy flow north and west respectively through the town centre surrounds converging adjacent to the railway station and continuing north towards the River Thames. The paths of both rivers are affected at points by culverts and channeling, while other sections accompany open space (including the Waterlink Way). In September 2010 the Council completed a final draft of the River Ravensbourne Corridor Improvement Plan which seeks to support opportunities to enhance the river and provide specific and general design guidance. Large parts of the town centre are at some risk of flooding from these sources as well we from surface water and sewerage flooding.

A number of key historical assets exist in the borough, including two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and conservation areas. In the town centre a number of listed and locally listed buildings exist (including the Grade II The Church of Stephen and the Church of St Saviour and Sts John the Baptist and Evangelist) as well as four conservation areas in or around the town centre (St. Stephen's, Belmont, Mercia Grove and St. Mary's) and several others in the nearby surrounding area. The borough and the town centre has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals. The centre also falls within a wider Area of Archaeological Priority.

2.2. Likely trend in the town centre environment without the implementation of the AAP

The Core Strategy assesses the likely trends in Lewisham if the Core Strategy is not implemented. The effects of the AAP not being implemented are largely similar to that identified for the Core Strategy and therefore a short summary of the effects are provided here only.

Socio economic trends

- The opportunity to boost the economic performance of Lewisham Town Centre is unlikely to be realised without the implementation of the AAP. The Lewisham Gateway scheme is central to the stimulation of the local economy, and as it is a strategic allocation the implications of this development are considered in detail in the Core Strategy SA.
- The AAP provides a coordinated framework and requirements for development that will ensure the best possible development is achieved in the area. Without the AAP development is likely to be piecemeal and would result in an uncoordinated approach.
- The aspiration of securing enough retail floorspace to reach Metropolitan retail status (as defined in the London Plan) is also likely to be unrealised if the AAP is not implemented.
- The AAP policies set out priorities for environmental improvements, improvements to the public realm and social infrastructure requirements which can be secured as part of new developments. Without this policy it is unlikely that the same level of contributions will be able to be secured.

Environmental trends

- The AAP sets out an ambitious approach to energy generation which sets out a framework for creating a local large scale decentralised energy network in the longer term but also short term measures for on-site energy generation. Without this policy framework it is very unlikely that this will be implemented, and the potential to reduce carbon emissions in new development will not be fully realised.
- Opportunities to protect, create and enhance biodiversity habitats in the borough, including naturalising local rivers may not be realised.
- Opportunities for public realm improvements may be lost.
- Opportunities to maximise the efficient use of land and use existing infrastructure better in order to accommodate the projected increase in population will not be realised.

3. Lewisham Town Centre Area Action Plan Vision

The Greater London Authority predicts that the overall population of Lewisham is expected to increase by close to a quarter between 2006 and 2031. This represents an additional 64,300 people. The Council, mindful of the above statistic, has a preference for ambitious borough-wide regeneration and growth which could see more than 19,000 new homes in the borough by 2025.

The Council's overarching planning spatial vision is set out in the emerging Core Strategy, the principal document in the LDF. The Core Strategy is underpinned by five thematic strategic objectives:

- Regeneration and growth areas
- Providing new homes
- Growing the local economy
- Environmental management
- Building a sustainable community

The Core Strategy supports the London Thames Gateway growth area and the London Plan Opportunity Area designations, with physical growth and regeneration primarily focused on areas in the north of the borough. This approach responds to the local character of the borough and the need to capitalise on the higher public transport accessibility of the area; intensifying land uses, in town centres and redesignated employment/industrial land.

The Core Strategy sets out the Lewisham town centre as one of the key Regeneration and Growth Areas in the borough. As such, it is expected to accommodate substantial new jobs, homes and supporting facilities and infrastructure becoming a focus of change and significant regeneration.

The Council has undertaken various rounds of public consultation in preparing the Core Strategy and submitted the final version to the Government for its approval in October 2010. A decision is expected by early 2011. The Core Strategy Vision and Strategic Objectives are provided as Appendix 1.

The challenge is how the vision for Lewisham town centre as set out in the Core Strategy is implemented through a spatial and land use framework in the form of an AAP.

Lewisham Town Centre AAP 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 called Shaping our Future:

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

The Core Strategy takes forward the SCS vision by setting out a detailed spatial vision for the whole Borough. In terms of Lewisham Town Centre, it sets out the following:

“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 ”

This vision has been developed into a series of objectives for the Lewisham Area Action Plan which are set out below. These objectives will guide the production of policy through providing a tool to assess policy and proposals against.

Area Action Plan Objectives

The following objectives have been derived utilising the results of the review of policy, programmes and objectives. The objectives have been organised by theme, to ensure that the AAP covers the full scope of issues and topics defined by statutory documents in the planning framework and contextual strategic documents. The amended objectives will then feed into the Issues/Options phase and the parallel Sustainability Appraisal process

Objective 1 - Retail and town centre status: To support and improve the vitality and viability of Lewisham town centre by enhancing distinctive features such as the street market and achieving Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space and improved leisure floorspace

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 accessibility.

Objective 3: Sustainable Design: To apply consistently high standards of sustainable urban design and construction to individual sites to ensure that developments make the best use of natural resources, 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 retaining/re-providing employment generating uses, the redevelopment of key sites throughout the centre for a range of non-residential uses, including offices and the enhancement of training opportunities.

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 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 place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of educational, 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

4. Relevant Plans, Programmes and Objectives

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.

The table in **Appendix 3** summarises a number of regional and local plans and programmes that have been reviewed with a view to identifying policies, objectives and baseline information of relevance to the Lewisham Town Centre area.

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

<i>International</i>
<p>Agenda 21 Declaration Rio de Janeiro (1992)</p> <p>Convention on Biological Diversity, Rio de Janeiro (1992)</p> <p>Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</p> <p>The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) 2002</p> <p>Status: Statutory</p>
<i>European Union</i>
<p>European spatial declaration on sustainable development, European Union (1999)</p> <p>Status: voluntary</p> <p>European Spatial Development Perspective (1999)</p> <p>EU Sustainable Development Strategy (2001)</p> <p>European Community Biodiversity Strategy (1998)</p> <p>Sixth Environment Action Programme of the European Community (2002 – 2012)</p> <p>Status: voluntary</p> <p>Air Quality Framework Directive (96/62/EC) and daughter Directives</p> <p>Status: Statutory</p> <p>Directive 2003/87/EC</p> <p>Landfill Directive 99/31/EC</p> <p>Framework Waste Directive (Directive 75/442/EEC, as amended)</p> <p>Status: Statutory</p> <p>Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora)</p> <p>Status: Statutory</p> <p>Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds)</p> <p>Status: Statutory</p> <p>Water Framework (2000/60/EC)</p>

Status: Statutory EU Sixth Environmental Action Plan (2002)
<i>National</i>
Environmental Assessment of Plans & Programmes Regulations (2004) Status - Statutory Planning and Compulsory Purchase Act (2004) Status - Statutory Town And Country Planning Act (1990) Status - Statutory Planning and Energy Act (2008) Status - Statutory Energy Act (2008) Status - Statutory Use Classes Amendment Order (2005) Status - Statutory UK Climate Change Act (2008) Planning Policy Statement (PPS) 1: Delivering sustainable development PPS: Planning and climate change – supplement to PPS1 PPG2 Green belts PPS3 Housing PPS4 Planning for Sustainable Economic Growth PPS5 Planning for the historic environment PPS9 Biodiversity and geological conservation Draft PPS: Planning for a Natural and Healthy Environment PPS10 Planning for sustainable waste management PPS12 Local spatial planning PPG13 Transport PPG14 Development on unstable land PPG17 Planning for open space sport and recreation PPG19 Outdoor advertisement control PPS22 Renewable energy PPS23 Planning and pollution control PPS25 Development and flood risk By Design: Urban Design in the planning system (2000) Planning and access for disabled people: A good practice guide Education and skills – delivering results a strategy to 2006 (revised 2002) Sustainable development action plan for education and skills (2003) Delivering choosing health: making healthier choice easier (2004)

<p>CLG employment land reviews: guidance note (December 2004)</p> <p>Homes for the future, more affordable, more sustainable (2007)</p> <p>Transport 2010: Meeting the local transport challenge (2000)</p> <p>UK Air Quality Strategy 'Working together for clean air'</p> <p>Our energy future, creating a low carbon economy (2003)</p> <p>Waste Strategy for England (2008)</p>
<i>London</i>
<p>The Mayor's Air Quality Strategy (2002) and Clearing the air: The Mayor's draft air quality strategy (2010)</p> <p>Developing London's Economy, the Mayor's Economic Development Strategy (2010)</p> <p>Connecting with nature, the Mayor's Biodiversity Action Plan (2002)</p> <p>London Biodiversity Partnership Action Plan (1996)</p> <p>The Mayor's Cultural Strategy (2004)</p> <p>London Climate Change Adaptation Strategy (2008)</p> <p>Streets For All: A Guide to the management of London's Streets – English Heritage (2000)</p> <p>Guide to Preparing Open Space Strategies (2004)</p> <p>Empty Homes in London (2004)</p> <p>London Housing Strategy (2010)</p> <p>The Mayor's Transport Strategy (2010)</p> <p>The London Plan and the draft London Plan (2010)</p> <p>Mayor of London's Municipal Waste Management Strategy (2003)</p> <p>NHS and Urban Planning in London – Final Report (2003)</p> <p>'Supplementary Guidance on the protection of strategic views In London</p> <p>The London Road Safety Plan (2001)</p> <p>GLA Supplementary Planning Guidance on Employment Land</p> <p>The Mayor's Ambient Noise Strategy</p> <p>Mayor of London 'Green Light to Clean Power' Energy Strategy (2004)</p> <p>Revised London View Management Framework (2009)</p> <p>London Tree and Woodland Framework</p>
<i>Lewisham</i>
<p>Lewisham Unitary Development Plan</p> <p>Lewisham Sustainable Community Strategy (SCS)</p> <p>Community Safety Strategy (2008-2011) (CSS)</p> <p>Safer Lewisham Plan (2009-10)</p> <p>Lewisham Corporate Plan 2008-2011</p> <p>Lewisham Volunteering Strategy</p> <p>Ageing well in Lewisham – A well-being strategy for older people 2007-10</p>

Lewisham Local Cultural Strategy (2002)
 Lewisham Regeneration Strategy 2008-20
 Lewisham Local Area Agreement (LAA) (2009)
 Healthier Communities – A health and well-being framework for Lewisham
 Lewisham Physical Activity, Sport and Leisure Strategy (2007-12)
 Social Inclusion Strategy 2005-13
 Local Biodiversity Action Plan – A Natural Renaissance For Lewisham
 Lewisham Leisure and Open Space Study (2009)
 Lewisham Housing Strategy 2009 -2014
 Brighter futures: Lewisham’s Homelessness Prevention Strategy 2009-2014
 (DRAFT- June 2009)
 Lewisham Children and Young People’s Plan 2009-2012
 Creative Lewisham – Lewisham Cultural and Urban Development Commission
 Safer Places: The planning system and crime prevention
 Draft Lewisham Municipal Waste Strategy 2004/05 – 2009/10
 Lewisham Carbon Reduction and Climate Change Strategy (2008)
 Lewisham Local Air Quality Action Plan (2008)
 Lewisham Strategic Flood Risk Assessment (2008)
 Lewisham Flood Risk and Development Sequential Test (2009)
 Lewisham borough-wide transport assessment (2009)
 Lewisham Employment Land Study (2008)
 Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment
 (JSNA)(2009)
 Lewisham Retail Capacity Study (2009)
 Lewisham Infrastructure Delivery Plan (2009)
 Lewisham Strategic Housing Market Assessment (2008)
 South East London Boroughs’ Strategic Housing Market Assessment (2009)
 Lewisham Affordable Housing Viability Assessment (2009)
 Town Centre Health Checks (2009)
 Lewisham PPS1 Energy Study (2009)
 Ravensbourne River Corridor Improvement Plan (2010)
 South East London Boroughs’ Joint Waste Appointment Technical Paper (2009)
 Lewisham Town Centre Transport Study (2009)
 Lewisham draft Local Implementation Plan (2010)
 Deptford New Cross Masterplan (2007)
 Lewisham Tall Buildings Study (2010)
 Lewisham Borough Wide Character Study (2010)
 Lewisham Conservation Area Appraisals and Management Plans

Lewisham Children and Young People's Plan (2009)
Lewisham Social Inclusion Strategy (2005)
Local Education Authority School Plan
Lewisham NHS Estate Strategy
Healthy Weight, Healthy Lives (PCT with LB Lewisham) 2009

The social, economic and environmental issues that were identified from this review are summarised in Section 6 and included in detail in **Appendix 4**.

5. Issues From Consultations and Studies

Urban Practitioners 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. 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.

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) 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.

As previously detailed, the SA Scoping Report originally completed in 2005 has been refreshed in 2010 during the process of performing this version of the SA. A number of responses were received that have influenced the development of this report.

The social, economic and environmental issues that were identified from the review of each of these consultations are summarised in Section 6 and included in detail in **Appendix 4**.

6. Summary of Key Sustainability Issues for the SA

The key sustainability issues facing the borough are listed in the following table along with source documents that constitute the evidence base for these.

Key issues	Source
Economic	
<p>Poor rates of growth in the retail offer in Lewisham Town Centre</p> <p>With predicted population growth there is a need for enhancing 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> <p>Low quality retail offer</p> <p>Issues with the street market, including mess and refuse, upgrading and improper parking</p> <p>Provision of adequate employment land to support business enterprise</p> <p>Sufficient employment land will need to be protected and new land sought to improve the overall economy of the town centre and the borough. Opportunities need to be taken to support employment growth sectors.</p> <p>Limited offer and a lack of growth of the evening economy</p>	<ul style="list-style-type: none"> • Lewisham Employment Land Study 2008 • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Economic Development Business Plan 2004 (Ancer Spa) • Lewisham Retail Capacity Study 2009 • Lewisham Town Centre Health Check Report 2008/09 • London-wide Town Centre Health Checks Analysis 2008 • Managing the Night Time Economy 2007 • Consultation Results
Environmental	

Key issues	Source
<p>Protect and improve biodiversity and natural habitats including local waterways</p> <p>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.</p> <p>The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.</p> <p>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.</p> <p>The Rivers Quaggy and Ravensbourne run through the AAP area and increase the risk of flooding in the area</p> <p>Future increased development could lead to increased potential risk of surface water flooding and sewer surcharging.</p> <p>Water quality and use</p> <p>In order to proceed with housing growth then water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance.</p> <p>Water quality of river and groundwater is needed as the town centre is situated within an Inner Source Protection Zone (SPZ1)</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Leisure and Open Space Study 2009 • Lewisham (A natural renaissance for Lewisham) Biodiversity Action Plan 2006 • Thames Strategy East 2008 • Green Chain Policy Document 1977 • Ravensbourne River Corridor Improvement Plan 2010 • London River Restoration Action Plan (LRRAP) (2009) • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Strategic Flood Risk Assessment 2008 • Sequential Test 2009 • Lewisham Characterisation Study 2010
<p>CO₂ emissions contributing to climate change</p> <p>Climatic change due to greenhouse gas emissions from fossil fuel use are 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.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Carbon Reduction and Climate Change Strategy 2008 • Lewisham Energy Strategy • Air Quality Action Plan 2008 • Lewisham Renewable Energy Study 2009 • Strategic Flood Risk Assessment 2008 Sequential Test 2009 • Local Implementation (Transport) Plan 2006

Key issues	Source
<p>Traffic congestion and car dependence</p> <p>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> <p>High levels of air pollution due to traffic</p> <p>Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020 • Local Implementation (Transport) Plan 2006 • North Lewisham Links Strategy 2007 • Ravensbourne River Corridor Improvement Plan 2010 • Borough-wide Transport Study 2010 • Lewisham Town Centre Transport Study 2009 • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Air Quality Action Plan 2008 • Health Issues in Planning, Best Practice Guidance 2007 • Transport 2025, Transport vision for a growing world city, November 2006
<p>Aging building stock and poor levels of insulation</p> <p>The existing building stock will require updating with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings</p> <p>The need to increase the amount of renewable energy generated in the borough</p> <p>Lewisham's Energy policy requires an increase in the proportion of energy generated from renewable energy sources</p> <p>Low levels of recycling and the need to reduce total waste production</p> <p>There is a need to reduce waste generation and improve recycling and composting rates. With requirements to manage our waste within the borough boundaries this issue will become increasingly important.</p>	<ul style="list-style-type: none"> • Lewisham Energy Strategy • Lewisham Renewable Energy Study 2009 • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • South East London Boroughs' Joint Waste Apportionment Technical Paper • Lewisham Waste Management Strategy
Social	
<p>High demand for housing, affordability and continuous growth in population.</p> <p>The population is forecasted to rise. The Mayor of London requires 9,750 new residential units to be built in Lewisham by 2017. The average income of the majority of households</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Strategic Housing Market Assessment 2008

Key issues	Source
<p>is insufficient to buy a house.</p> <p>There is an issue with access to affordable housing in Lewisham, highlighted by Lewisham Housing Commission.</p> <p>Decent homes</p> <p>The percentage of homes that do not meet decent homes standards is reducing, however there is still a need to improve this.</p>	<ul style="list-style-type: none"> • South East London Sub Regional Strategic Housing Market Assessment 2009 • Housing Strategy 2009 • Children and Young Peoples Plan
<p>Improved access to health care, education and community facilities</p> <p>Ensure that improved and accessible health, education and community facilities are provided to accommodate the needs arising from new developments and meeting existing needs.</p> <p>Low levels of educational attainment</p> <p>There is a need to improve the educational attainment of students in primary and secondary schools as previous years Lewisham has come 132nd out of 147 authorities in the BVPI results in terms of percentage of pupils achieving A-C in five or more GCSEs.</p> <p>Addressing deprivation, social exclusion and health inequalities</p> <p>Lewisham has a number of severely deprived areas. Fourteen of Lewisham wards have part of their area in the 20% most deprived wards in England. In Lewisham Central residents have also reported higher levels of limiting long term illness and lower than average food health levels.</p> <p>There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Social Inclusion Strategy 2005 • Lewisham NHS Estate Strategy • Local Education Authority Plans • Lewisham Infrastructure Delivery Plan • Lewisham Physical Activity, Sport and Leisure Strategy 2006 • Lewisham School Sports Facility Strategy 2006 • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Children and Young Peoples Plan • Local Education Authority School Plan • Lewisham School Sports Facility Strategy 2006 • Indices of Multiple Deprivation 2007 • Joint Strategic Needs Assessment
<p>General perception of high crime rates in Lewisham</p> <p>Though Lewisham has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment with adequate natural surveillance. 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>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Social Inclusion Strategy 2005 • Lewisham Local Cultural Strategy 2002 • Metropolitan Police statistics
<p>Provision of open space and recreational facilities</p> <p>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</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Leisure and Open Space Study 2009 • Lewisham Physical Activity, Sport and

Key issues	Source
<p>access to open and green space is a key issue for local residents.</p>	<p>Leisure Strategy 2006</p> <ul style="list-style-type: none"> • Green Chain Policy Document 1977
<p>Noise</p> <p>Road traffic and road works noise are the most problematic types of noise for Lewisham residents, and there are also issues with industrial noise in parts of the borough.</p> <p>Road safety</p> <p>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.</p> <p>The number of road accidents although reducing could still be improved.</p>	<ul style="list-style-type: none"> • Quality of Life Survey 2004 • Best Value performance indicators
<p>Conserve 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> <p>Lewisham has two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and conservation areas. The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals. In the town centre, there are a number of Grade II listed churches, buildings and monuments of intrinsic historic and townscape value.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Deptford New Cross Masterplan 2007 • Lewisham Local Cultural Strategy 2002 • Lewisham Conservation Area Appraisals and Management Plans • Lewisham Local List • Listed Buildings • Lewisham UDP Schedules 1A, 3 and 5 • Lewisham Leisure and Open Space Study 2009 • Lewisham Tall Buildings Study 2010 • Lewisham Characterisation Study 2010

7. Sustainability Appraisal Objectives

7.1. Introduction

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

7.2. Sustainability Objectives

The sustainability objectives that have been used as the basis for sustainability appraisal of the Lewisham Town Centre Area Action Plan are presented in Table 1 below. These sustainability objectives are distinct from the plan objectives of the Area Action Plan. The assessment for each appraisal are limited to those which are relevant.

The full list of SA objectives including monitoring information, targets and indicator sources are available in Appendix 5.

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

Ref	Topic	Sustainability Appraisal Objectives
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
Env 2	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
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
Eco 3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment
Eco3	Local business	To increase density of local business
Eco4	Employment opportunities	To increase access to local employment and reduce local unemployment

8. AAP options and alternatives

The Lewisham Town Centre AAP sets out the vision, objectives, strategy and policies that will guide public and private sector investment to manage development and regeneration in the centre over the next 5 to 10 years.

In developing the AAP a series of options and alternatives were produced. An initial Issues and Options Report was produced in June 2005. At this time feedback was provided on the sustainability implications of each set of options. Wherever possible, the preferred option was identified. The results of this analysis are provided at Annex C of the Sustainability Appraisal Report of the Preferred Options for the Lewisham Town Centre AAP, April 2007. The Further Options Report itself also details the options generation process undertaken to date and is located in Appendix 3 of that report. Please refer to that section for further detail.

9. Appraising the AAP and the likely significant effects

9.1 Methodology

This section sets out a summary of the main issues resulting from the appraisal of the Lewisham Town Centre AAP against the sustainability objectives. 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.

The evaluation of likely effects involves forming a judgement based on:

- The criteria of significance in Annex II of the SEA Directive; and
- The baseline characteristics and indicators outlined above and in Appendix xxx on whether or not a predicted effect will be environmentally significant.

Both predictions and evaluations may be qualitative 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 below:

++	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

The internal consistency of the sustainability appraisal objectives has not been appraised in this report, as the objectives are based on those in the Core Strategy where this is appraised in section 7.1 of that SA report.

9.2 Appraising the AAP objectives

This section summarises the appraisal carried out to test the AAP objectives against each SA objective. This exercise was undertaken at the Scoping stage of the SA and 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. 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 AAP objectives
- There is possible conflict between provision of additional housing and access to healthcare, employment and other local facilities for existing and new population. AAP objectives 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 objectives.

Comparison of DPD objectives against sustainability 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
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

	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
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

9.3 Appraising the AAP area wide spatial policies and character areas

This section summarises the outcome of the appraisal on the AAP area wide spatial policies and the appraisal of the character area policies. These policies have been summarised together to avoid repetition as many of the benefits and issues are reflected both in the area wide policies and in the character area policies.

Key benefits

Key benefits identified have been summarised below:

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 would also contribute towards SOC7, as through encouraging people to live above commercial units in the centre of town 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 offer.

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. This policy therefore scored particularly well against SA objectives ENV3 (sustainable transport) and ENV10 (maintain and enhance landscapes and townscapes). The 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

The key conflicts that have been identified as part of the appraisal process are set out below:

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 sequential test for Lewisham has already been undertaken, therefore an exception test will be required in order to satisfy PPS25 in terms of the acceptability of residential on sites in flood zone 3a.

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. 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. However, 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.

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 SA objectives here if the policy is not carefully implemented.

Mitigation measures

The loss of MOL at Loampit Vale and Lewisham Gateway is mitigated through the provision of new high quality open space within the new developments.

The level of parking promoted in policy TRS2 is necessary to ensure that the town centre is able to compete in the future with nearby retail centres. Other policies in the AAP seek to greatly improve pedestrian links across the town centre, which will help to encourage shorter journeys to the town centre to be made by foot. The area also benefits from very good PTAL scores and the development of Lewisham Gateway close to public transport links will help to encourage the use of sustainable modes of transport.

In terms of flooding, policies which propose development on land at risk of flooding indicate that developers should work closely with the Environment Agency to ensure proposals are acceptable in terms of flood risk and do not increase the risk of flooding. The sequential test for Lewisham indicates that there are no sequentially preferable sites available for the major sites in this AAP affected by flood risk as these particular sites have a crucial role in the future regeneration of the centre of Lewisham. To adapt and mitigate the risk of flooding AAP policies require that buildings are designed to be resilient to flood risk and that Sustainable Urban Drainage Systems (SUDS) and other mitigation measures are included. Further discussions with the Environment Agency and the production of Exception Tests are required to develop more vulnerable uses such as housing within areas identified as falling within Flood Zone 3a in Lewisham's SFRA.

9.5 Cumulative and long term effects

Cumulative impacts refers to the total or combined impacts or effects arising from the implementation of the policies. The impact can be positive or negative. The cumulative and long term effects of the policies have been considered on a policy by policy basis in the detailed assessment tables contained in appendix 1.

A summary of the appraisal findings in terms of cumulative impact is below:

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.

9.6 Mitigation measures

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 (see Appendix 1).

9.7 Uncertainties and risks

Uncertainties

The AAP has been assessed with the assumption that the economy, the natural environment and society does not diverge significantly from the current state of affairs. However, there can be unforeseen events that may alter the effect of the plan, such as the impacts of recession or environmental disasters. These are events that are beyond the control of plan making bodies.

The potential impact of the plan on climate change is also very difficult to measure, as many of the impacts are dependent upon how the policy is implemented on the ground.

Risks

The SA was carried out by consultants in conjunction with Council planning officers. There is potential for subjective decision making leading to different appraisal scores by different individuals, however the scoring has been reviewed by a number of parties to ensure it is considered consistent.

9.8 Conclusions

The SA process identified that the AAP was likely to result in a number of social, economic and environmental benefits. The main benefits were in association with the proposals to provide new housing and retail within the town centre. This will contribute positively towards the sustainable economic growth SA objectives and also contribute towards securing additional affordable housing in a location which has excellent public transport links (Lewisham Town Centre has a PTAL score of 6 on average). The AAP policies seek to diversify retail uses and to improve the public realm significantly which will help to make the town centre environmentally and economically resilient in the future.

The town centre is affected by flood risk, with large parts classified as high or medium risk of flooding. Development of new housing within high risk flood areas is proposed as part of the AAP and this conflicts with the SA objective to reduce the risk and effects of flooding (ENV2). However the proposals would have significant regeneration benefits and would help to fulfil Lewisham's wider economic and social objectives, in particular, the achievement of Metropolitan retail status. Lewisham's Sequential Test has indicated that there are no alternate locations for the scale and type of development proposed, therefore exception tests will need to be undertaken to ensure that the final proposals are acceptable in terms of flood risk. The policies also require that flood mitigation measures are included in the design of development and that the Council liaise closely with developers.

Another potential conflict identified was in terms of parking provision. Policies seek to retain the amount of parking for shoppers in the town centre and increase provision in relation to any new retail development. This conflicts with the sustainability objective to encourage sustainable modes of transport. However, easy access to parking is a key advantage to Lewisham town centre which can differentiate its offer with other nearby competing retail centres, therefore it is considered essential to retain as much parking as possible.

Two of the key developments proposed in the AAP involve the loss of Metropolitan Open Land (MOL). However the quality and function of this MOL is limited, and the loss of the land is mitigated through the reprovision of open space. The loss of MOL at these sites has been considered and appraised in detail as a separate process to this work.

10. Proposals for monitoring

The evidence of how the SA objectives are being affected can only be detected by looking at evidence of how economic, environmental or social circumstances are changing in the borough over time. It is proposed that the effects of the objectives will be assessed using the monitoring framework provided in Appendix 5.

Appendix 5 details the sustainability appraisal objectives, appropriate indicators, current results, trends/comparator, frequency and period of monitoring and any targets that have been set. These are closely linked to the indicators of the Annual Monitoring Report, the Local Area Agreement, the monitoring framework of the AAP and other local or regional plans such as the Biodiversity Action Plan and the Local Implementation Plan (transport) to ensure consistency and accuracy of data. SA guidance states that SA monitoring should take an objectives and targets approach. It may be used to assess:

- accuracy of predictions of sustainability affects
- whether the AAP is achieving or moving away from SA objectives and targets
- whether mitigation measures are performing as well as expected
- whether there are any adverse effects and if remedial action is desirable.

Future monitoring should particularly have regard to objectives which have shown to be most effected by the AAP and are considered to be the following:

- waste management
- water consumption
- traffic flow
- air quality
- open space
- energy consumption
- housing provision
- employment levels
- crime
- developments in flood risk areas.

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

11. Next steps

Following a period of consultation on the Further Options Report of the AAP and this Sustainability Appraisal, the Submission Version of the AAP will be prepared along with a final Sustainability Appraisal. The SA adoption statement will be published to demonstrate how environmental and sustainability considerations have been integrated in to the plan making process.

How to comment on this report

You can tell us what you think about any part of this Sustainability Appraisal report. Comments must be in writing and can be made in any of the following ways:

Web

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

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

OR

E-mail

planning@lewisham.gov.uk
with 'LDF AAP Further Options Report' as the subject.

OR

Post

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

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

Please send comments by: 5pm on (To be confirmed).

It may not be possible to take account of comments that are received after this date.

APPENDIX 1: Appraisal of Lewisham Town Centre AAP

Matrix 1: Area wide spatial policies

AAP Policies	Sustainability Objectives													Cumulative impact	Timing & permanency	Comments					
	SOC						ENV						ECO								
	1	2	3	4	5	6	7	8	9	10	11	12					13	1	2	3	4
LTC HSG3	+	+	0	0	0	0	+	0	0	0	0	0	0	+	0	-	-	0	Unless carefully managed there is potential for the erosion of town centre /Lewisham wide office/employment space.	Long term Permanent	The provision of new homes through conversion of empty offices or vacant premises above shops will provide much needed new housing in the centre of Lewisham. New housing provides natural surveillance therefore helps to reduce opportunity for crime. There is potential conflict as the use of vacant offices/areas above shops reduces the overall employment floorspace available to let, however the policy requires LTC EMP2 to be met which requires other regeneration objectives to be met. There is potential for further reference to be made that conversion should be carried out in a flexible manner so as to allow for future changes in the economic climate, the policy has been adapted to reflect this. The re-use of existing buildings minimises resource consumption, therefore this policy scores positively against this.
LTC SH2	+	+	0	0	0	0	+	0	0	0	0	0	0	+	+	+	+	+	The use, and transport of materials and the resource requirements to develop new homes and retail units could cumulatively impact upon the local environment depending on how major development	Long term Permanent	The development of Lewisham Gateway and Loampit Vale will result in the loss of MOL. However it is proposed to provide new public space as part of the developments and this will mitigate this loss to some degree, and this has been fully considered and appraised as part of the Core Strategy. Development here is critical to ensure that Lewisham is capable of achieving Metropolitan status. The policy supports the sustainable economic growth objectives, by encouraging new retail, a mix of uses including evening economy uses and improvements to the shopping environment. This policy will need to be carefully implemented to ensure that the best use of resources is made and to encourage recycling of building materials and sustainable sourcing of materials as far as possible.



AAP Policies	Sustainability Objectives													Cumulative impact	Timing & permanency	Comments								
	SOC			ENV													ECO							
	1	2	3	4	5	6	7	8	9	10	11	12	13				1	2	3	4	5			
																			is undertaken.					
LTC SH3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Unlikely	Short- long term Temporary	The market will contribute significantly to the vibrancy of the local economy, and complement the retail offer of the town centre. Therefore there is estimated to be a significant positive impact in terms of the sustainable economic growth SA objectives.
LTC SH5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Unlikely	Short-long term Permanent	The retention of A1 retail units in the primary shopping area will help to retain the diversity of retail offer, however could reduce the chance of encouraging a more sustainable mix of uses in the town centre. However other uses will be more appropriate outside the primary shopping area of the town centre, therefore it is not anticipated that this will be inappropriate.
LTC SH6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Unlikely	Short – long term Permanent	The change of use of a number of A1 units in secondary shopping areas to other uses could have a cumulative impact on the performance of the town centre, however the policy seeks to mitigate this through imposing particular criteria for development. The policy contributes particularly positively towards the objective of encouraging an evening economy as it provides flexibility to do this.
LTC SH7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Unlikely	Short- long term Permanent	The retail character areas ensure the town centre contains a mix of retailing appropriate to the areas, and the surrounding hinterland. Therefore this policy also contributes positively towards achieving the sustainable economic growth objectives.
LTC SH8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Unlikely	Short-long term Permanent	The policy encourages proposals that would contribute positively to the evening economy where particular criteria are met. These include ensuring the retail character of the area is not harmed and the cumulative impact of the proposal would not harm the amenity of nearby residents. This policy therefore contributes very positively towards SA objective ECO2 in particular. The impact upon retail offer and local businesses will depend upon implementation.

AAP Policies	Sustainability Objectives														Cumulative impact	Timing & permanency	Comments				
	SOC				ENV				ECO												
	1	2	3	4	5	6	7	8	9	10	11	12	13	1				2	3	4	5
																			whole borough.		encouraging public spaces to be designed so that they are able to be used for events etc (potentially for food fairs, Christmas markets etc) which will also help to raise the profile of Lewisham Town Centre and improve perceptions of it.
LTC URB7	0	0	+	0	+	0	0	0	+	+	0	0	0	0	0	0	0	0	There is potential for a wider cumulative impact upon the river catchment in improving the quality of these sections of waterway	Short-long term Permanent	The policy seeks to safeguard Waterlink Way and to protect and enhance the environs of the River Quaggy and the River Ravensbourne. The policy also promotes the creation of a park at the confluence of the rivers. These measures will all contribute positively towards the achievement of SOC3, through improving access to the rivers, SOC5, through enhancing waterway heritage, and by increasing the quality and provision of open space. The policy will also contribute positively to the achievement of ENV3, through seeking to extend the Waterlink Way and through seeking to enhance the rivers contribute towards ENV1 and ENV9.
LTC EMP1	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	The potential loss of employment uses will need to be carefully managed as there is a potential cumulative impact if this approach is taken in the wider area.	Short-long term Permanent	This policy seeks to retain or re-provide employment uses in the town centre, although allows for the potential redevelopment or conversion of other employment sites (apart from Molesworth Street area) provided that the buildings have been vacant for at least 2 years and that the scheme will assist in achieving regeneration objectives. Therefore this policy contributes positively towards increasing the provision of housing and also in creating a resilient economy. There could potentially be a minor negative impact in terms of achieving the objective or increasing density of local businesses and access to local employment depending on how the policy is implemented. It is recommended that this is carefully monitored.
LTC EMP2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+		Short-long term Permanent	Encouraging the retention and further provision of large scale office development in the town centre will contribute positively to ensuring there is a resilient economy, increasing the density of local businesses and increasing access to local employment, therefore performs well against the sustainable economic

AAP Policies	Sustainability Objectives													Cumulative impact	Timing & permanency	Comments										
	SOC			ENV					ECO																	
	1	2	3	4	5	6	7	8	9	10	11	12	13				1	2	3	4	5					
LTC TRS2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	There is a potential cumulative impact in retaining the level of car parking in terms of air quality, as it facilitates the continued use of private motor vehicles. This will need to be carefully monitored.	Short – long term	The policy seeks the retention of the quantity of parking available to shoppers, and additional provision to provide for new retail development. The policy therefore scores poorly against the SA objectives which seek to reduce dependency on the car, improve air quality and also in terms of healthy lifestyles as it facilitates the use of the car. However, retaining an adequate amount of shopper parking in the town centre will give it an advantage to other nearby retail centres, and therefore this policy performs positively in terms of its potential to contribute towards increasing the diversity of retail offer.
LTC TRS3	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	There are potential positive cumulative impacts if enhancement are made to the wider pedestrian and cycle movement networks	Short – long term	The policy promotes opportunities for enhancements to pedestrian and cycle routes therefore contributes positively towards SA objectives SOC3, SOC11 and ENV3 through encouraging healthy and sustainable movement through the AAP area.
LTC TRS4	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0		Short-long term	The policy promotes opportunities for enhancements to pedestrian environment around the roundabouts therefore contributes positively towards SA objectives SOC3, SOC11 and ENV3 through encouraging healthy and sustainable movement through the AAP area.
LTC	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	Unlikely to have	Short-long term	This policy promotes a range of community uses in the town centre, and promotes a new cinema in the

AAP Policies	Sustainability Objectives															Cumulative impact	Timing & permanency	Comments												
	SOC					ENV					ECO																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	1	2				3	4	5									
COM3																									cumulative impact		Lewisham Gateway site and new sports and leisure facilities at Loampit Vale. Therefore contributes positively towards achieving SOC4, 5, 6 and 11. The policy also promotes the reuse of the Playtower building therefore contributing positively towards ENV10.			
B policies																														
New policy 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Medium- long term Permanent	Potential for positive cumulative impact as the policy constructs an achievable framework for community energy and heating	The policy seeks to reduce carbon dioxide emissions in the town centre through incorporating PV technologies, wind, CHP/Biomass that are capable of implementation on a small scale initially, but should be designed so as to enable potential community scale networks to be developed. Therefore this policy contributes in a very positive way to ENV1 and 4 and also positively towards ECO3 in that it helps to produce a resilient economy. There is potential for there to be issues with air quality if biomass is used, both in terms of its use and its transportation – therefore care will be need in the implementation of this policy.
New Policy 2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Short- long term		The policy seeks to ensure that social infrastructure provision is provided to meet the needs of growth promoted by the AAP, therefore this policy is likely to have a very positive impact in terms of SA objectives SOC4,8 and 11.

Matrix 2: Sub-area specific policies

AAP Policies	Sustainability Objectives													Cumulative impact	Timing & permanency	Comments					
	SOC						ENV						ECO								
	1	2	3	4	5	6	7	8	9	10	11	12					13	1	2	3	4
Character areas																					
Gateway - Kings Hall Mews	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Short-medium term Permanent	The Lewisham Gateway proposals themselves has been appraised as part of the Core Strategy SA process. However the additional adjacent site of Kings Hall Mews has been appraised here as design guidance has been provided in the AAP to ensure the site is developed to complement the proposals for Lewisham Gateway. The proposals for the site has been assessed to potentially have a positive impact on the townscape and therefore contribute positively to SA objective ENV/10.
	+	+																		New development within flood zone 3a could have a cumulative impact in terms of flood risk in the local and surrounding area. The implementation of this policy will need to be carefully managed.	Much of the area is located within flood zone 3a, and is proposed for residential use, therefore a sequential test will be required as residential uses are proposed. The policies for this site state that developers would be required to work closely with the Environment Agency to ensure appropriate flood mitigation is incorporated. This policy therefore is assessed as having a very negative impact in terms of SA objective ENV2. However the policies do contribute very positively towards achieving SOC1 and 2 as they would result in new housing. The policies would also contribute towards achieving sustainable economic growth through promoting retail to complement that of the core of the town centre. The policies also promotes the improvement of the public realm and tree planting therefore contributing positively to ENV1 through providing increased shading and also ENV3 as it promotes improved links across the area.
Loampit Vale	+	+																	0	Short-long term Permanent	
	+	+																	0	Medium- long term Permanent	The development of new homes in this area contributes very positively towards SOC1 and 2. The policies also promote the incorporation of significant public realm improvements, the provision of the Waterlink Way, naturalisation and improvements to
Conington Road	+	+																	0		

AAP Policies	Sustainability Objectives													Cumulative impact	Timing & permanency	Comments			
	SOC			ENV						ECO									
	1	2	3	4	5	6	7	8	9	10	1	2	3				4	5	
																			the ecological quality of the river and improved access to Lewisham Station all contribute towards SOC3, ENV2, 9 and 10. The policies also contribute positively towards ECO1 as they promote new retail floorspace and a mix of other uses which will help to diversify the retail offer. However, care will need to be taken to ensure heritage assets in the vicinity of the Tescos are retained and enhanced.
																		Short term	Much of the area is located within flood zone 3a, and is proposed for residential use, therefore a sequential has been undertaken which indicates an exception test will be required as residential uses are proposed. The policies state that developers would be required to work closely with the Environment Agency to ensure appropriate flood mitigation is incorporated. This policy therefore is assessed as having a very negative impact in terms of SA objective ENV2. However the policy does contribute very positively towards achieving SOC1 and 2 and it would result in new housing. The policy would also contribute towards achieving sustainable economic growth through promoting retail to complement that of the core of the town centre. The policy also promotes the improvement of the public realm and biodiversity therefore contributing positively to ENV9 and 10 and also ENV3 as it promotes improved links across the area and SOC3 as it promotes improved access to the river.
Lee High Road																		Permanent	New development within flood zone 3a could have a cumulative impact in terms of flood risk in the local and surrounding area. The implementation of this policy will need to be carefully managed.
																		Short-long term	
Southern																		Permanent	These policies supports the reuse of Ladywell Baths for community uses therefore scores positively against SOC4 and also SOC5. The policy also promotes new housing development on a vacated site therefore contributes very positively towards SOC1, SOC2 and ENV10. The area is proposed to be part of the Low carbon zone and is identified for decentralised energy, therefore scores positively against ENV1 and ENV4. New retail is also promoted here therefore scoring positively against SA objective ECO1 and ECO3. The policy also prioritises investment in Waterlink Way and highway

AAP Policies	Sustainability Objectives															Comments					
	SOC					ENV					ECO						Cumulative impact	Timing & permanency			
	1	2	3	4	5	6	7	8	9	10	11	12	13	1	2				3	4	5
																			improvements therefore scores positively in terms of sustainable transport.		
Central	+	+																	New development within flood zone 3a could have a cumulative impact in terms of flood risk in the local and surrounding area. The implementation of this policy will need to be carefully managed.	Short-long term Permanent	<p>Much of the area is located within flood zone 3a, and is proposed for residential use, therefore a sequential test will be required as residential uses are proposed. The policies state that developers would be required to work closely with the Environment Agency to ensure appropriate flood mitigation is incorporated. These policies are therefore assessed as having a very negative impact in terms of SA objective ENV2. However, the policies do contribute very positively towards achieving SOC1 and 2 and it would result in new housing. The policies would also contribute towards achieving sustainable economic growth through promoting new retail in the town centre and a new anchor to encourage people to use the full length of the High Street. The policies also promote the enhancement of the market. The policies also encourage the improvement of the public realm and new landscaping therefore contributing positively to ENV10 and also ENV3 as it promotes improved links across the area and better pedestrian facilities. SOC3 as it promotes improved access to the river and Waterlink Way. Leisure uses are also potentially promoted within the area, therefore this contributes positively towards SOC11.</p>

APPENDIX 2: Lewisham Core Strategy Vision and Strategic Objectives

CORE STRATEGY VISION FOR LEWISHAM 2026

In 2026 the regeneration and physical transformation of the London Borough of Lewisham will meet the needs and aspirations of existing and new residents and visitors by creating a sustainable, vibrant, exciting suburb on the edge of inner London one which supports safe, attractive and diverse communities where local people are at the heart of the regeneration process. It will be a place of choice for people to live, work and relax, having played a key part of the success in the Thames Gateway and of London as a world city.

Local, including historic, character will be at the heart of new design. New development throughout the borough will meet the challenges of climate change, flood risk, the need for renewable and low carbon energy, and the use of sustainable materials and construction practices. Accessibility and inclusiveness, and design to reduce crime and the fear of crime will be at the heart of the design of new developments. The provision of new green space will be emphasised both in terms of local recreation and children's play space, and new initiatives for urban food growing and the provision of allotments. Biodiversity in new developments will have been enhanced wherever possible through the provision of on-site open and amenity space, including the use of living roofs and walls. The borough will be greener by a programme of street tree planting.

Key regeneration and development opportunities will have been focused on the localities of Lewisham, Catford, Deptford and New Cross due to the desire to address deprivation issues in order to improve education standards, general health and well-being, and local employment and training, through improvements to the physical and economic environment, facilitated by the availability of sites and informed by character considerations.

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 Commill 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.

Deptford and New Cross will become a sustainable location with a high quality environment, where an increasing number of businesses wish to locate, and where people choose to live, supported by new community facilities and public transport. The area will build on its prestigious art and educational institutions (Goldsmiths College University of London, Trinity Laban and the Albany Theatre) to become a thriving centre for creative businesses. Both Deptford High Street and New Cross Road will be vibrant local shopping areas. Deptford High Street will sustain its role in providing a highly varied selection of goods sold by individual traders with a bustling street market at its heart.

Deptford and New Cross will have improved connected street networks, particularly walking and cycling links. Connections to the rest of the borough and London will be easier. The streets, walkways and parks will be of an excellent standard, having taken full advantage of their proximity to the River Thames and local waterways.

The north of the borough will have been transformed by the regeneration of large strategic sites that will provide new places for people to enjoy, and new facilities to support existing and new communities. New development will provide a mix of jobs, training opportunities and high quality homes including housing for families to meet local need, and will have helped to improve residents' quality of life, health and well-being. The physical environment for businesses, and availability of suitable premises will have improved. The local economy will be more diverse and will cater for new and growing sectors including green industries, and service businesses that take advantage of the area's close proximity to central London, and will cater for traditional industrial activities and sites accommodating necessary infrastructure essential to the functioning of London. Millwall Stadium will become an attractive and inclusive leisure destination for all the community. Convoys Wharf will see the re-opening of wharf uses to provide a sustainable facility for the river transport of cargo in association with a new mixed use development providing local jobs and new homes.

Catford Town Centre, home of the council's services and the civic heart of the borough, will be a lively, attractive town centre focused around a high quality network of public spaces. Driven by the redevelopment of key opportunity areas, including the redevelopment of the former Catford Greyhound Stadium site and the Shopping Centre, Catford will have an improved retail offer and will be home to a diverse residential community. The Broadway Theatre and Studio will continue to be a focus for arts and cultural activities and the market will continue to contribute to Catford's identity.

Outside the key areas of physical regeneration, the pleasant character of the many high quality residential neighbourhoods will have been retained by development that is sensitive to context and appropriate in size and scale to its location. The borough will have enhanced its unique assets including the preservation of historic sites and conservation areas; the protection and improvement of parks, gardens and open space and river networks such as the Waterlink Way, South East London Green Chain and the East London Green Grid; improved public transport links; and a network of vibrant major streets connecting and supporting places within and beyond the borough.

Vibrant hubs of local activity, centred on the district and local centres of Blackheath, Downham, Forest Hill, Lee Green, Sydenham, Hither Green and Brockley Cross, will anchor residential areas, deliver essential shops and services needed for daily life and provide enjoyable places for people to meet and use, and will be supported by locally significant business areas. These centres will also be supported by a network of viable local shopping centres and parades such as Crofton Park, Lewisham Way and Grove Park that will provide accessible services and facilities reducing the need to travel.

People living in the Beilingham, Whitefoot and Downham wards will have benefited from the various social and economic programmes addressing and improving health, education, and local employment and training.

Communities across the borough will rely on effective local and excellent facilities to support their day to day life, including the following services: health, education, community, arts, cultural, entertainment, leisure, sports and recreation. All secondary and primary schools will have been rebuilt or refurbished, contributing to improved educational standards. The completion of the East London Line extension (the London Overground) and the Thameslink programme will ensure better connections for the borough to London and beyond.

Lewisham will draw on the resources of all in the community and work together with its partners to deliver the vision to ensure that by 2026 it has capitalised on its many opportunities over the past 15 years.

CORE STRATEGY STRATEGIC OBJECTIVES

Regeneration and growth areas

Core Strategy Objective 1: Physical and socio-economic benefits

Regeneration and redevelopment opportunities in Lewisham, Catford, Deptford and New Cross, through the delivery of new homes and jobs, will be used to secure substantial physical and environmental improvements and socio-economic benefits throughout the area to improve deprivation.

Providing new homes

Core Strategy Objective 2: Housing provision and distribution

Provision will be made for the completion of an additional 18,165 net new dwellings from all sources between 2009/10 and 2025/26 to meet local housing need and accommodate the borough's share of London's housing needs. This aims to exceed the London Plan target for the borough. Of these:

- 2,600 will be distributed within the Lewisham Town Centre
- 1,750 will be distributed within the Catford Town Centre
- 10,625 will be distributed within Deptford and New Cross

- 3,190 will be distributed across the remainder of the borough.

Core Strategy Objective 3: Local housing need

Provision will be made to meet the housing needs of Lewisham's new and existing population, which will include:

- provision of affordable housing
- a mix of dwelling sizes and types, including family housing
- lifetime homes, and specific accommodation to meet the needs of an ageing population and those with special housing needs and
- bringing vacant dwellings back into use.

Growing the local economy

Core Strategy Objective 4: Economic activity and local businesses

Investment in new and existing business and retail development will be facilitated to improve the physical environment for commercial enterprises, to result in a year on year sustainable increase in the size of the borough's economy through:

- protecting and developing a range of employment and training opportunities in the borough
- retaining business and industrial land that contributes to the industrial and commercial functioning of London as a whole, and/or which supports the functioning of the local economy including premises for the creative industries, green industries, business services and other employment growth sectors
- ensuring the future growth of the local economy by the mixed use redevelopment of identified industrial sites that require extensive physical investment and improvement
- developing Lewisham town centre to promote it to a Metropolitan Town Centre by 2026, and maintain the status of Catford as a major town centre, with a focus on quality design and development protecting and enhancing the district shopping centres, local shopping centres, parades and the range of farmers' and street markets, as providers of sustainable local shopping facilities and services to continue to support basic community needs.

Environmental management

Core Strategy Objective 5: Climate change

The Council with its partners will take action to ensure that climate change is adapted to and mitigated against, including those measures necessary to create a low-carbon borough and reduce carbon emissions by:

promoting resource and water efficiency maximising generation and use of renewable energy and locally distributed energy, particularly for major development sites building to high standards of sustainable design and construction reducing waste generation supporting environmental protection and enhancement including establishing ecological networks minimising the environmental impacts of development including water, noise and air pollution.

Core Strategy Objective 6: Flood risk reduction and water management

The Council with its partners will take action to protect the borough from the risk of flooding and reduce the effects of flooding from all sources, including the Thames, Ravensbourne, Quaggy and Pool rivers, and manage improved water quality by: using the Environment Agency's sequential and exception tests to allocate land for development requiring river restoration and appropriate flood defences as part of development proposals, where appropriate ensuring appropriate local flood defences are maintained and provided for and requiring sustainable urban drainage systems in new development, wherever feasible.

Core Strategy Objective 7: Open spaces and environmental assets

The important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by: protecting all open space including Metropolitan Open Land protecting Sites of Nature Conservation Importance and supporting and promoting local biodiversity requiring green roofs and walls where appropriate implementing the Street Tree Programme improving the quality of, and safeguarding access to, all public open space providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way and river and waterways network and the Thames path.

Core Strategy Objective 8: Waste management

Deliver sustainable waste management by implementing the waste hierarchy of prevent, reuse, compost and recycle, and safeguarding sites within the Surrey Canal Strategic Industrial Location to meet Lewisham's waste apportionment of 323,000 tonnes by 2020.

Building a sustainable community

Core Strategy Objective 9: Transport and accessibility

Provision will be made to ensure an accessible, safe, convenient and sustainable transport system for Lewisham that meets people's access needs while reducing the need to travel and reliance on the private car. This will: promote choice and better health facilitate sustainable growth in the key localities for regeneration and growth (Lewisham, Catford, Deptford, New Cross) improve integration, accessibility and connectivity within the borough and the London sub-region.

The Council will ensure that transport and accessibility within the borough: provides for a system of walking and cycling routes and strong links to town centres and public open space, including the Waterlink Way, and promotes the implementation of greenways improves accessibility in the Evelyn, Whitefoot, Bellingham and Downham wards facilitates the movement of freight while minimising the adverse impacts of traffic, noise and emissions delivers key infrastructure projects including the Thameslink programme, the lower 'h' road at Lewisham, removal of the Kender gyratory system and safeguarding provision for the Surrey Canal station as part of the London Overground network.

Core Strategy Objective 10: Protect and enhance Lewisham's character

Lewisham's distinctive local character will be protected through sensitive and appropriate design, in particular those areas requiring managed change and protection such as the borough's heritage assets and their settings, local rivers and landscapes, yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean: ensuring that new development achieves high standards of urban design and residential quality and contributes to a sense of place and local distinctiveness ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment preserving or enhancing the borough's conservation areas, listed buildings and the other identified elements of the historic environment including archaeological remains.

Core Strategy Objective 11: Community well-being

The Council with its partners will provide and support measures and initiatives that promote social inclusion and strengthen the quality of life and well-being for new and existing residents of the borough by: addressing deprivation and health inequalities particularly within the wards of Evelyn, New Cross, Lewisham Central, Whitefoot, Bellingham and Downham creating safer and stronger communities by reducing crime and the fear of crime through innovative design and land use policies providing physical, social and green infrastructure, including high quality health and education facilities, that are accessible and suitable to all of Lewisham's residents, to foster independent community living.

APPENDIX 3: Plans, programmes and objectives

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
INTERNATIONAL			
<p>Agenda 21 Declaration Rio de Janeiro (1992)</p> <p>Convention on Biological Diversity, Rio de Janeiro (1992)</p>	<p>Committed countries to the principles of sustainable development. The Convention came into force on 29 December 1993. It has 3 main objectives:</p> <ul style="list-style-type: none"> • conserve biological diversity • sustainable use of biological diversity • fair and equitable sharing of the benefits of biological diversity. 	<p>Sustainability principles must underpin the AAP and its policies. This involves the integration and balancing of economic, environmental and social objectives into the AAP.</p> <p>Ensure that the protection and enhancement of the borough's biodiversity is accounted for in the AAP.</p>	<p>SA objectives must ensure sustainability underpins all aspects of the AAP.</p> <p>SA objectives must ensure that biodiversity conservation is adequately factored into AAP policies and other DPDs.</p>
<p>The Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</p> <p>The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) 2002 Status: Statutory</p>	<p>Contains the key obligation requiring the reduction in anthropogenic CO₂ levels to at least 5% below 1990 levels by 2012.</p> <p>Adopts a 10-year framework of programmes of action seeking to accelerate the shift towards sustainable consumption and production and reverse the trend in the loss of natural resources and biodiversity by 2010.</p>	<p>The AAP must contain policies that address and mitigate the impact of climate change.</p> <p>Reaffirmed UK commitment to sustainable development.</p>	<p>Supporting programme.</p> <p>Supporting programme.</p>
EUROPEAN UNION			
<p>European spatial declaration on sustainable development Proponent body European Union</p>	<p>The aim is to work towards a balanced and sustainable development of the territory of the European Union.</p>	<p>Reaffirmed UK commitment to sustainable development.</p>	<p>Supporting programme.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>1999</p> <p>Status: voluntary</p> <p>European Spatial Development Perspective (1999)</p>	<p>ESDP aims to ensure that the three fundamental goals of European policy are achieved equally in all the regions of EU:</p> <ul style="list-style-type: none"> • economic and social cohesion • conservation and management of natural resources and the cultural heritage • more balanced competitiveness of the European territory. 	<p>AAP should seek to maximise resource sustainability and respect and preserve the existing historical and cultural landscape of Lewisham as far as possible. The AAP achieves this through the ongoing protection of the borough's conservation areas and policies promoting sustainable design.</p>	<p>The SA should include objectives and criteria related to protecting and enhancing historic and cultural heritage and reducing greenhouse gas emissions. The contribution to the form and function of the urban areas of the borough should be viewed positively and the plan's objectives should reflect this.</p>
<p>EU Sustainable Development Strategy (2001)</p>	<p>Proposes measures to deal with important threats to the well-being of people in the EU such as climate change, poverty and emerging health risks.</p>	<p>Sustainability principles must underpin the AAP and all its policies. This involves the integration and balancing of economic, environmental and social objectives into the AAP.</p>	<p>SA objectives should ensure sustainability underpins all aspects of the AAP.</p>
<p>European Community Biodiversity Strategy 1998</p>	<p>Seeks the conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).</p>	<p>The AAP and other DPDs must seek to protect and enhance biodiversity levels in the borough.</p>	<p>The SA objectives should include the protection and enhancement of biodiversity.</p>
<p>Sixth Environment Action Programme of the European Community 2002 - 2012</p> <p>Status: voluntary</p>	<p>The programme identifies four environmental areas for priority actions:</p> <ul style="list-style-type: none"> • climate change • nature and biodiversity • environment and health and quality of life • natural resources and waste <p>The Directives aim to reduce specified air pollutants.</p>	<p>The AAP should seek to address these priority areas for action.</p>	<p>Supporting programme.</p>
<p>Air Quality Framework Directive (96/62/EC) and daughter Directives</p> <p>Status: Statutory</p>	<p>Introduces an EU wide emissions trading scheme in order to meeting the Community's commitment to achieving an 8% reduction in</p>	<p>AAP requires robust policies relating to improving air quality, which will help to reach attainable targets that are set within the SEA Framework.</p>	<p>The appraisal framework requires an objective relating to air quality, attainable targets, and recognised indicators that will allow for progress to be effectively monitored.</p>
<p>Directive 2003/87/EC</p>	<p>Introduces an EU wide emissions trading scheme in order to meeting the Community's commitment to achieving an 8% reduction in</p>	<p>AAP strategic objectives must focus on reducing the boroughs overall carbon footprint in all planning related</p>	<p>The SA objectives must reflect the carbon reduction targets detailed in the Directive and other national</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Landfill Directive 99/31/EC	emissions of greenhouse gases by 2008 to 2012 compared to 1990 levels, and the longer term commitment to reduce global emissions of greenhouse gases by approximately 70% compared to 1990 levels. The Directive places limits on the amounts of biodegradable waste sent to landfill sites.	areas.	legislation.
Framework Waste Directive (Directive 75/442/EEC, as amended) Status: Statutory	The Directive seeks to reduce the quantity of waste going to 'final disposal' by 20% from 2000 to 2010, and by 50% by 2050, with special emphasis on cutting hazardous waste.	The AAP policies should aim to reduce waste generation by implementing the waste hierarchy. The AAP policies must seek to implement the waste hierarchy in order to meet the required target for waste minimisation.	The SA objectives must aim to minimise waste generation and maximise sustainable waste management in the borough. The SA objectives must aim to reduce the amount of waste requiring final disposal. Indicators and targets are required for the proportion of waste reused/recycled/recovered. Supporting programme.
Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) Status: Statutory	Promote the maintenance of biodiversity by requiring member states to introduce robust protection measures to maintain or restore natural habitats and wild species	Requirement to include an Appropriate Assessment at preferred options stage and policies to protect listed species and habitats included in the Habitats directive.	Supporting programme.
Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds) Status: Statutory	The maintenance of the favourable conservation status of all wild bird species across their distributional range.	The AAP will be required to contain policies that protect bird species and their habitats generally but is obliged to do so with regard to species listed in the Birds Directive.	Supporting programme.
Water Framework (2000/60/EC) Status: Statutory	To establish a framework to address pollution of waterways from urban wastewater and agriculture and to improve Europe's waterways.	The AAP is required to include policies on protection and enhancement of water courses and reduce urban wastewater discharge into the river systems.	Supporting programme.
EU Sixth Environmental Action Plan (2002)	The Plan seeks a high level of protection of the environment and human health and for general improvement in the environment and quality of life.	The AAP should include robust policies at protecting and enhancing the overall environment in the borough.	SA objectives must include measures aimed at improving overall environmental quality.
NATIONAL			
Environmental Assessment of Plans & Programmes Regulations 2004	No targets Transposes the SEA directive into UK law	Given effect through PPS12 and SA of Regional Spatial Strategies and LDFs – Consultation Paper	The SA structure and content must reflect that outlined in the regulations and associated

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>Status - Statutory</p> <p>Planning and Compulsory Purchase Act 2004</p> <p>Status - Statutory</p>	<p>No targets</p>	<p>Clause 38 places a duty on local authorities to contribute to the achievement of sustainable development. The local planning authority is required to produce a SA to accompany certain planning documents.</p>	<p>guidance note</p> <p>The SA structure and content must reflect that outlined in the regulations and associated guidance note</p>
<p>Town and Country Planning Act 1990</p> <p>Status - Statutory</p>	<p>No targets</p>	<p>Set out the procedures for the preparation, approval and adoption of development plans and for the control of development. Certain parts of the Act need to be adhered to in preparing the LDF.</p>	<p>Although not directly relevant the SA needs to comply with legislative requirements.</p>
<p>Planning and Energy Act 2008</p> <p>Status - Statutory</p>	<p>An Act to enable local planning authorities to set requirements for energy use and energy efficiency in local plans.</p>	<p>The AAP can include policies aimed at increasing the proportion of energy generated from renewable energy sources.</p>	<p>The SA objectives should include measures to mitigate against the effects of climate change.</p>
<p>Energy Act 2008</p> <p>Status - Statutory</p>	<p>Among other energy matters, this Act makes provision for electricity generated from renewable sources.</p>	<p>The legislation provides an enabling mechanism for the AAP to make provision for decentralised renewable energy generation.</p>	<p>The SA objectives should include measures to mitigate against the effects of climate change.</p>
<p>Use Classes Amendment Order 2005</p> <p>Status - Statutory</p>	<p>Two new use classes are introduced - A4 Drinking Establishments and A5 hot food take aways.</p>	<p>The AAP can seek to adopt policies that can control the concentration of these uses in the borough in order to enhance the borough's character.</p>	<p>The SA objectives should include measures aimed at preserving diversity of retail uses in town centres (major, district and local).</p>
<p>UK Climate Change Act (2008)</p>	<p>The net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline</p>	<p>The Site Allocations DPD should reflect objectives for climate change mitigation and adaptation</p>	<p>The sustainability objectives should consider climate change to ensure that the Site Allocations DPD contributes to the target.</p>
<p>UK Strategy for sustainable development</p>	<p>Living within environmental limits Ensuring a strong, healthy and just society Achieving a sustainable economy Promoting good governance Using sound science responsibly</p>	<p>These objectives must be considered in the allocation of sites</p>	<p>The objectives have been used to develop the sustainability objectives.</p>
NATIONAL PLANNING POLICIES			
<p>Planning Policy Statement (PPS) 1:</p>	<p>Sets out the overarching planning principles</p>	<p>The AAP must complement PPS1.</p>	<p>The SA objectives must reflect the</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Delivering sustainable development	<p>and policies on the delivery of sustainable development through the planning system. These policies complement, but do not replace or override, other national planning policies and should be read in conjunction with other relevant statements of national planning policy.</p>	<p>Policies must be worded to enable the council to adopt more detailed implementing strategies to achieve the objectives of PPS1.</p>	<p>concept of sustainable development as outlined in PPS1.</p>
PPS: Planning and Climate Change – Supplement to PPS 1 (2007)	<p>Sets out how planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and resilient to the climate change now accepted as inevitable.</p>	<p>The AAP must provide a framework that promotes and encourages renewable and low carbon energy generation. Policies should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure.</p> <p>The AAP should fully support the transition to a low-carbon future in a changing climate.</p>	<p>The SA objectives should include measures to mitigate against the effects of climate change.</p>
Draft PPS: Planning for a Low Carbon Future in a Changing Climate	<p>Sets out a planning framework for securing enduring progress against the UK's targets to cut greenhouse emissions and use more renewable and low carbon energy, and to plan for the climate change.</p>	<p>The AAP must be prepared in conformity with the requirements of PPG 2.</p>	<p>The SA objective should mitigate and adapt to the impacts of climate change.</p>
PPG2 Green belts	<p>Outlines the manner of designation and safeguarding of green belts to complement the London Plan's objective to safeguard Metropolitan Open Land.</p>	<p>The AAP must detail how and where allocated housing numbers will be accommodated in the borough over the plan period.</p>	<p>The SA objectives must include the protection of open space, green belts and biodiversity.</p>
PPS3 Housing	<p>Sets out the complementary relationship between planning and the need for housing provision</p>	<p>The AAP must take this PPS into account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.</p>	<p>The SA objectives must include the provision of sufficient housing of an appropriate standard, mix and tenure.</p> <p>The SA objectives must encourage sustainable economic growth and development.</p>
PPS 4: Planning for Sustainable Economic Growth	<p>Sets out the Government's comprehensive policy framework for planning for sustainable economic development in urban and rural areas.</p>	<p>The AAP must take this PPS into account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.</p>	<p>The SA objectives must conserve and enhance the historic environment and heritage assets.</p>
PPS 5: Planning for the Historic Environment	<p>The PPS's overarching aim is that historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.</p>	<p>The AAP must take this PPS into account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.</p>	<p>The SA objectives must conserve and enhance the historic environment and heritage assets.</p>
PPS5 Planning for the Historic	<p>This document is designed to assist local</p>	<p>The AAP must take this PPS into</p>	<p>The SA objectives must conserve</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Environment: Historic Environment Planning Practice Guide	authorities and other stakeholders in implementing PPS5.	account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.	and enhance the historic environment and heritage assets.
PPS9 Biodiversity and geological conservation	Local authorities must take into account the protection of existing biodiversity and geological resources within their jurisdiction in making planning decisions	The AAP should seek to protect and enhance the boroughs local biodiversity and geological features wherever possible.	The SA objectives should include measures to protect and enhance the borough's local biodiversity and geographical resources.
PPS10 Planning for sustainable waste management	Sets out the Government's policies on sustainable waste management and provides guidance on LDF preparation and on determining planning applications.	The AAP must include a policy on sustainable waste management that takes local conditions into account.	The SA objectives must seek to minimise waste generation and increase recycling.
PPS12 Local spatial planning	Sets out the Government's policy on the preparation of LDFs.	The AAP must be prepared in conformity with the requirements of PPS12.	The SA must comply with the requirements of s19(5) of the Planning and Compulsory Purchase Act 2004 and should appraise the economic, social and environmental sustainability of the plan.
PPG13 Transport	Integrate land use planning and transport at national, regional and local levels in order to promote sustainability objectives including sustainable transport, accessibility and social inclusion.	The AAP must include policies that promote sustainable urban design principles that will in turn reduce the need for travel, increase accessibility and promote the use of sustainable transport.	The SA objective must include measures to reduce car dependence and encourage sustainable forms of transport.
PPG14 Development on unstable land	Advice on development of unstable land to ensure that the physical constraints are accounted for when planning developments. Criteria for assessing the need for recreational and leisure facilities and identifying deficiencies in public open space.	The AAP must take account the requirements of the PPG 14.	The SA objectives should ensure safety levels are considered in site selection for future development. SA objectives must include measures that protect and maintain adequate levels of open space and aim to improve the health and well-being of the population by promoting suitable strategies including those to improve the level of accessibility to leisure facilities in the borough.
PPG17 Planning for open space sport and recreation		The AAP should contain policies that seek to protect existing open space from inappropriate development.	The SA objectives should contain measures that seek to enhance the borough's streetscape.
PPG19 Outdoor advertisement control	Aims to ensure that outdoor advertising contributes positively to the appearance of an attractive and cared-for environment.	The AAP should include policies that promote best practice urban design principles that are sensitive to the local context.	

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
PPS22 Renewable energy	The emphasis is on the promotion of renewable energy via the planning system.	The AAP must be prepared in conformity with the requirements of PPS 22.	The SA objectives must include measures to encourage the use of renewable energy in order to mitigate against climate change.
PPS23 Planning and pollution control	Sets out the Government's strategy on planning and pollution control, including contaminated land.	The AAP must be prepared in conformity with the requirements of PPS23.	The SA objectives should contain measures that seek to minimise pollution.
PPS 25 Development and flood risk	Sets out Government policy on development and flood risk	The AAP must adopt policies that manage and mitigate against the risk of flooding and adopt a robust approach to avoiding inappropriate development in high risk areas.	SA objectives must include measures to minimise and mitigate against the risk of flooding.
Draft PPS: Planning for a Natural and Healthy Environment	Sets out the vision for conserving and enhancing biological diversity in England and includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and geodiversity through the planning system.	The AAP must promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development, and to maintain networks of natural habitats by avoiding their fragmentation and isolation.	The SA objectives must protect open space and conserve natural habitats, biodiversity and geodiversity, and enhance its access routes.
Community Infrastructure Levy: An overview (2010)	The Community Infrastructure Levy (CIL) is a new charge which local authorities in England and Wales will be empowered, but not required, to levy on most types of new development in their areas. The proceeds of the levy will provide new local and sub-regional infrastructure to support the development of an area in line with local authorities' development plans.	Infrastructure planning is fundamental to the delivery of the vision for the area, as expressed in the Sustainable Community Strategy and AAP. Charging authorities should 5ormally implement CIL on the basis of an up-to-date development plan, and must produce a charging schedule settling out the CIL rates in their area. The CIL rates should not put at serious risk the overall development, and use evidence to strike an appropriate balance between the desirability of funding infrastructure planning	THE SA needs to highlight the need for partnership working to improve the delivery and provision of infrastructure (physical, social and green) in response to the needs of the local communities.
By Design: Urban Design in the planning system (2000)	Sets out the Government's aim to encourage better urban design.	The AAP should include policies promoting good urban design that is relevant to the local context.	SA objectives must include those promoting sustainable urban design principles.
Planning and access for disabled people: A good practice guide	The guide aims to improve accessibility levels for disabled people by the adoption of	The AAP should include a policy ensuring accessibility for people with	The SA objectives must include measures that improve accessibility

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Education and skills – delivering results a strategy to 2006 (revised 2002)	appropriate urban design strategies.	disabilities both in the public realm and proposed developments in order to maximise the potential for social inclusion.	for all people in the community.
Sustainable development action plan for education and skills (2003)	The Strategy seeks to improve learning and skills for children, young people and adults in the community.	The AAP should, as part of its emphasis on sustainability, adopt planning policies that maximise the opportunities for learning in the borough. Doing so will enhance the overall quality of life for residents.	The SA objectives should include a measure providing for the improvement of education and skill levels in the borough.
Delivering choosing health: making healthier choice easier (2004)	The Strategy seeks to improve learning and skills for children, young people and adults in the community in order to create a more sustainable society.	The AAP should, as part of its emphasis on sustainability, adopt planning policies that maximise the opportunities for learning in the borough. Doing so will enhance the overall quality of life for residents.	The SA objectives should include a measure providing for the improvement of education and skill levels in the borough.
CLG employment land reviews: guidance note, December 2004	The overarching objective of the Department of Health's PSA is to improve the health of the population. The plan recognises the vital importance of co-delivery between local government and the NHS in partnership with local communities.	The AAP should contain a policy that aims to promote health care in collaboration with key stakeholder agencies such as the PCT and local hospital trusts.	The SA objectives should contain a measure to improve the health and well-being of the population.
A new deal for transport: better for everyone (1998)	The objective of the strategy is to ensure that the best employment sites are protected from incompatible land uses.	The AAP, in accordance with a suitable evidence base, should adopt a policy on protecting strategically important employment land in order to ensure the ongoing growth of the local economic base.	In accordance with sustainability principles, the SA objectives should seek to integrate the need to protect important employment land with other desirable land uses.
Transport 2010: Meeting the local transport challenge (2000)	This strategy expresses a commitment to create better, more integrated transport system to tackle the problems of congestion and pollution.	The AAP must adopt a comprehensive sustainable transport policy approach. This would involve urban design policies aimed at reducing the need to travel (promoting mixed use developments), sustainable forms of transport and managing car parking.	The SA objectives should promote a range of measures aimed at promoting sustainable transport to reduce carbon emissions. This can include objectives promoting sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.
	The strategy is a long term commitment to increase investment in the transport system in order to improve rates of patronage rates on sustainable modes of travel.	As local authorities have a crucial role in the delivery of this strategy, the AAP must include policies that aim to complement the strategy by adopting	The SA objectives should promote a range of measures aimed at promoting sustainable transport in reducing the boroughs carbon

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>The future of transport White Paper (2004)</p>	<p>The Strategy is built around three central themes:</p> <ul style="list-style-type: none"> • sustained investment over the long term • improvements in transport management. 	<p>'best practice' urban design principles.</p>	<p>emissions. This can include sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.</p>
<p>UK Air Quality Strategy 'Working together for clean air'</p>	<p>The primary objective of the strategy is that everyone can enjoy a level of ambient air quality in public places which poses no significant risk to health or quality of life.</p>	<p>The AAP must adopt a comprehensive policy approach aimed at promoting sustainable transport in the borough. This would involve urban design policies aimed at reducing the need to travel (promoting mixed use developments), promoting sustainable forms of transport and managing car parking.</p> <p>Local authorities are encouraged to develop their own strategies and advice on air quality.</p>	<p>The SA objectives should promote a range of measures aimed at promoting sustainable transport in reducing the boroughs carbon emissions. This can include objectives promoting sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.</p> <p>The SA objectives must include measures that aim to improve ambient air quality in the borough.</p>
<p>Homes for the future – more affordable, more sustainable</p>	<p>Everyone to have access to a decent home at a price which they can afford, in a location where they would like to live and work.</p>	<p>The allocation of housing land should be based on the principles of Homes for the Future.</p>	<p>The sustainability objectives must reflect access to affordable housing.</p>
<p>our energy, our future, creating a low carbon economy</p>	<p>To replace and update energy infrastructure to address depleting energy resources and climate change.</p>	<p>The use of resources and access to renewable energy should inform the allocation of housing, employment and mixed use development sites.</p>	<p>The use of resources and the potential for renewable energy should be addressed.</p>
<p>Transport and the Historic Environment (English Heritage, 2004)</p>	<p>Identifies potential transport impacts on the historic environment, for example, from traffic and transport infrastructure, and opportunities to invest into the historic environment and the settings of heritage assets.</p>	<p>The AAP must adopt a comprehensive sustainable transport policy approach. This would involve urban design policies aimed at reducing the need to travel (promoting mixed use developments), sustainable forms of transport and managing car parking.</p>	<p>The SA objectives should promote a range of measures aimed at promoting sustainable transport to reduce carbon emissions. This can include objectives promoting sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.</p>
<p>Climate Change and the Historic Environment (English Heritage, 2007)</p>	<p>Provides an overview of climate change impacts on the historic environment and of the impacts associated with responses to climate change.</p>	<p>The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and</p>	<p>The SA should include objectives to support the protection and enhancement of historic assets.</p>

streets upon historic assets should form a basis for reviewing the suitability of development.

<p>Draft Guidance on Setting (English Heritage, 2010)</p>	<p>Shows how the settings of heritage assets should be defined in a development planning context, and how they should be managed.</p>	<p>The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.</p>	<p>The SA should include objectives to support the protection and enhancement of historic assets.</p>
<p>Understanding Place (2010)</p>	<p>Sets out a best-practice approach to historic area assessment as the basis for well-informed decisions regarding historic character.</p>	<p>The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.</p>	<p>The SA should include objectives to support the protection and enhancement of historic assets.</p>
<p>Building in Context (English Heritage, CABE 2007)</p>	<p>Provides case-study examples of how new development can respond well to historic character in terms of design.</p>	<p>The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.</p>	<p>The SA should include objectives to support the protection and enhancement of historic assets.</p>
<p>Seeing History in the View (English Heritage, 2010)</p>	<p>Shows how historic views should be defined and provides principles for their management to protect historic significance.</p>	<p>The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the</p>	<p>The SA should include objectives to support the protection and enhancement of historic assets.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	DPD	suitability of development.	
Streets for All (English Heritage, 2006)	Shows how public realm upgrades can be designed to be appropriate to and enhance the historic environment.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.	The SA should include objectives to support the protection and enhancement of historic assets.
Waste Strategy for England	<p>Reduce waste by making products with fewer natural resources</p> <p>Break the link between economic growth and waste growth</p> <p>Most products should be used or their materials recycled</p> <p>Energy should be recovered from other wastes where possible</p>	The strategy is particularly relevant to the waste site allocations; these should reflect the objectives of the strategy.	An objective for waste should be included in the sustainability objectives.
REGIONAL			
The Mayor's Air Quality Strategy (2002)	The Strategy concentrates on policies to promote healthy living and sets out measures to tackle London's air quality problem.	The AAP should include a policy aimed at improving air quality in line with that in the London Plan and the Council's own Air Quality Management Plan.	The SA objectives should include a measure aimed at improving air quality.
The Mayor's Economic Development Strategy (2001)	The Strategy aims to promote healthy living and help people participate in London's economy.	The AAP should include policies that promote healthy lifestyles in order to allow people to actively engage in London's economic growth.	The SA objectives should include measures that seek to encourage sustainable economic growth.
The Mayor's Biodiversity Action Plan (2002)	This Strategy sets policies and proposals to protect and care for London's biodiversity. Key aims include encouraging the greening of the built environment and the use of open spaces in ecologically sensitive ways.	The AAP should include policies that protect wildlife habitat and recognise opportunities for enhancement of biodiversity in the borough.	The SA objectives should contain measures that seek to protect and enhance biodiversity.
London Biodiversity Partnership	The partnership aims to protect and enhance the capitals habitats and species	The AAP should include policies that protect wildlife habitat and recognise	The SA objectives should contain measures that seek to protect and

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Action Plan (1996)	for future generations to enjoy.	opportunities for enhancement of biodiversity in the borough.	enhance biodiversity.
The Mayor's Cultural Strategy (2004)	The Strategy sets out the Mayor's proposals for developing and promoting cultural life in London, focusing on four key objectives: excellence, creativity, access and value.	The collective AAP policies should aim to improve the cultural and social aspects of life in the borough.	The collective SA objectives should aim to ensure the enhancement of cultural and social growth in the borough.
London's Warming – The impacts of Climate Change (2002)	The Study aims to identify the threats and opportunities presented by climate change.	The AAP policies should seek to complement the findings of the study.	The SA objectives should be underpinned by the overriding objective of reducing the impacts of climate change.
Streets For All: A Guide to the management of London's Streets – English Heritage (2000)	A good practice guide to street scene design, promoting excellence in materials use and workmanship to improve the urban environment and public realm.	The AAP policies on urban design should aim to improve the quality of the borough's public realm and overall streetscape.	The SA objectives should collectively aim to result in an improvement to the borough's streetscape and public realm.
Guide to Preparing Open Space Strategies (2004)	The Guide aims to assist boroughs in producing an open space strategy and establish a common framework for benchmarking and strategic planning in London.	The AAP should adopt policies on protecting open space that are in compliance with the Guide.	SA objectives should include measures to protect and enhance the quality of existing open space.
Empty Homes in London (2004)	The Report highlights the issue of empty homes London. It also sets out the current position with regard to the number of empty homes, summarises recent policy developments and gives information on the activities of the London boroughs, the Empty Homes Agency and the GLA.	The AAP policy on housing should take into account the recommendations of this report.	SA objectives should seek to ensure that sufficient numbers of new dwellings will be provided in the borough in order to accommodate the growth in population.
The Mayor's Transport Strategy (2010)	The MTS details priority areas for transport that directly or indirectly, benefit the environment and the London community.	The AAP policies should aim to complement the transport priorities for action set out in the Strategy.	SA objectives should contain measures that seek to reduce the need for car travel and encourage sustainable modes of transport.
The London Plan (2008)	The London Plan sets out strategic policies for spatial planning and development across London. The overall aim of the London Plan is to ensure London develops in a sustainable manner.	The AAP policies must be consistent with the London Plan as it legally constitutes a DPD.	The SA objectives must be in compliance with the policy objectives contained in the London Plan.

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The draft London Plan (2010)	As above, the draft London Plan updates the London Plan to ensure that London develops in a sustainable manner.	The Site Allocations DPD should reflect emerging policy, which represents current thinking.	The sustainability objectives should reflect the Integrated Impact Assessment of the emerging London Plan.
Mayor of London's Municipal Waste Management Strategy (2008)	The overall objective of the strategy is to reduce London's waste generation by 2020 and to sustainably manage the waste that is created. Waste reduction targets are detailed in the strategy.	The AAP should contain a policy on waste management that ensures compliance with the London Plan and also ensures that the objectives of the waste hierarchy.	The SA objectives must include measures that seek to reduce waste production and sustainably manage waste.
NHS and Urban Planning in London – Final Report (2003)	The purpose of the report is to describe how the NHS can engage more effectively in London's urban planning agenda. The report seeks to develop a clear understanding on the likely healthcare demands associated with projected population and housing increases.	The AAP policies must take into account the relationship between healthcare provision and the demands associated with the projected population and housing increases. The infrastructure planning evidence base justifying the AAP should detail the adequacy of healthcare infrastructure and its location, in relation to the projected population and housing growth.	The SA objectives should contain a measure that aims to ensure the ongoing health and well being of the population.
Supplementary Guidance on the Protection of strategic views In London	The main objective of the guidance in relation to the borough is to protect two strategic views of St Paul's Cathedral that pass through Lewisham.	The AAP policy on urban design must include a measure to ensure that new developments do not compromise strategic views.	The SA objectives must include a measure to maintain and enhance townscapes and streetscapes. This would include the need to protect strategically important views.
The London Road Safety Plan (2001)	The Plan seeks to reduce traffic congestion and increase safety by use of public transport, walking and cycling. Local boroughs are requested to prepare a Road Safety Plan and take this into consideration when preparing strategic planning documents.	The AAP policies should aim to improve road safety generally by seeking to reduce car use by the promotion of sustainable transport modes and improving the urban design of streets wherever possible.	SA objectives can improve road safety by aiming to reduce car travel and promoting sustainable transport modes.
GLA Supplementary Planning Guidance on Employment Land	The Guidance details criteria for judging the suitability of land for retention for employment purposes.	The AAP should ensure that suitable amounts of employment land are protected from conflicting land uses.	The SA objectives should include measures that encourage and promote employment and attract new employment opportunities to Lewisham.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
The Mayor's Ambient Noise Strategy	Minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practises and technology.	Protect noise sensitive land uses from noisy development and activities.	The SA objectives should include measures to minimise adverse effects of noise by separating incompatible land uses or mitigating against existing impacts.
Mayor of London 'Green Light to Clean Power' Energy Strategy	The strategy seeks to minimise the effect of London's energy production by reducing London's contribution to climate change by minimising emissions of carbon dioxide through energy efficiency, combined heat and power, renewable energy and hydrogen.	The AAP should be consistent with London Plan renewable energy targets. Decentralised renewable energy should also be promoted in appropriate developments in order to reduce the borough's carbon footprint.	The SA objectives must include a measure to promote the efficient use of natural resources.
London Housing Strategy (2010)	<p>Raise aspirations and promote opportunity: by producing more affordable homes, particularly for families, and by increasing opportunities for home ownership through the new First Steps housing programme;</p> <p>Improve homes and transform neighbourhoods: by improving design quality, by greening homes, by promoting successful, strong and mixed communities and by tackling empty homes;</p> <p>Maximise delivery and optimise value for money: by creating a new architecture for delivery, by developing new investment models and by promoting new delivery mechanisms.</p>	The Site Allocations DPD housing allocations should reflect the principles of the London Housing Strategy.	Sustainability objectives should consider the quality and affordability of housing supply.
Revised London View Management Framework 2009	New development should compliment heritage.	Consider the impact of site allocations on strategic views and the historic environment	Sustainability objectives should include the quality of the townscape.
London Tree and Woodland Framework	Plant the right trees in the right places to enhance the environment and quality of life.	Link to AAP and Development Management policies on trees.	Sustainability objectives should relate to landscape features, including trees.
Thames Catchment Flood Management Plan & TE2100 Plan	Provides an overview of the flood risk in the Thames catchment (including the Ravensbourne catchment) and sets out our preferred plan for sustainable flood risk	The AAP should take the findings of the Thames Catchment Flood Management Plan into account when developing its preferred spatial plan	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>Thames River Basin Management Plan (2009)</p>	<p>management over the next 50 to 100 years.</p> <p>About the pressures facing the water environment in this river basin district, and the actions that will address them. The Ravensbourne catchment falls within the "London catchment" described as "highly urbanised".</p>	<p>for the town centre.</p> <p>The AAP should take the findings of the Thames River Basin Management Plan into account when developing its preferred spatial plan for the town centre.</p>	<p>town centre.</p> <p>The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the town centre.</p>
LOCAL			
<p>Lewisham Unitary Development Plan (2004)</p>	<p>The UDP sets out the Council's statutory planning policies on a number of elements including urban design and construction, open space, environmental protection, housing, sustainable transport and parking, employment, town centres and education, leisure and community facilities.</p>	<p>The AAP should enable saved UDP policies to be incorporated into the LDF.</p>	<p>SA objectives should be used to appraise all AAP policies that can lead to saved UDP policies from being included in the LDF.</p>
<p>Lewisham Sustainable Community Strategy (SCS)</p>	<p>The SCS sets out the vision for the borough up until 2020 and includes objectives to improve social, environmental and economic outcomes for the borough. The SCS is critically important when formulating the AAP's vision for the borough.</p>	<p>The AAP vision should be informed by that of the SCS. The AAP also needs to be in broad conformity with the SCS objectives.</p>	<p>The SA objectives will appraise all elements of the AAP including the vision which is derived from the SCS.</p>
<p>Community Safety Strategy (2008-2011) (SCS) Safer Lewisham Plan (2009-10)</p>	<p>This plan sets out the results of the Strategic Assessment which identifies the key crime and disorder issues that face the borough, and the multi-agency actions that will be deployed to address them.</p>	<p>The urban design policies in the AAP should aim to improve community safety by design. Other policies should seek to improve education, economic growth and employment levels in the borough which will reduce the drivers of crime.</p>	<p>The SA objectives should contain measures reducing crime and the fear of crime.</p>
<p>Lewisham Corporate Plan</p>	<p>The purpose of the Corporate Plan is to:</p> <ul style="list-style-type: none"> • set out the Council's vision, values, strategic direction and key priorities for action up to 2009 and beyond • outline the Council's contribution to the delivery of the SCS 	<p>The AAP should have regard to the corporate priorities which are set out in the SCS and the Corporate Plan.</p>	<p>SA objectives should have regard to those contained in the Plan.</p>

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Lewisham Volunteering Strategy	Increase volunteering and awareness of volunteering in the borough.	The AAP may contain policies that seek to improve levels of social cohesion in the borough.	SA objectives should contain a measure to promote community identity across the borough.
Ageing well in Lewisham – A well-being strategy for older people 2007-10	The Strategy sets out ten outcomes that must be achieved in order to improve the lives of older people in Lewisham in line with their expectations. It contributes to the delivery of a number of priorities set out in the SCS.	The AAP should contain policies that maximises the quality of life for all residents including the borough's older residents.	The SA objectives should include measures that improve the well being and promote social inclusion of all sectors of the population including older people.
Lewisham Local Cultural Strategy (2002)	The aim of the strategy is to promote the cultural well being of the area.	The AAP should include a policy that seeks to promote local cultural diversity in the borough	The SA objectives should contain measures that promote the borough's cultural diversity as part of an overall promotion of a sense of community identity and welfare.
Lewisham Regeneration Strategy 2008-20	The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy for regeneration also complements the SCS.	The AAP should contain regeneration policies that complement the borough's regeneration strategy and the SCS as part of a coherent strategic policy approach.	The SA objectives should contain objectives that seek to ensure the sustainable development of the borough. This includes measures that seek to promote sustainable regeneration in suitable locations.
Lewisham Local Area Agreement (LAA) (2009)	The LAA is an agreement with central government that establishes 35 indicators and targets which address the key inequalities that exist in Lewisham. The LAA is a key delivery mechanism of the SCS.	The AAP should broadly complement the objectives of the SCS.	SA objectives should broadly complement the achievement of the LAA indicators.
Healthier Communities – A health and well-being framework for Lewisham	The Strategy aims to complement the achievement of the LAA objectives and seeks to improve the health outcomes for Lewisham residents by adopting preventative measures and other innovative approaches.	The AAP should be in compliance with the objectives of the SCS. As the LAA is the key delivery mechanism for the SCS objectives, it follows that the AAP should also complement meeting the objectives of the strategy.	The SA objectives should contain a measure seeking to enhance the health levels in the borough.
Lewisham Physical Activity, Sport and Leisure Strategy (2007-12)	The Strategy provides a framework for activity and development in Lewisham. It has three key aims: <ul style="list-style-type: none"> increase participation in physical activity 	The AAP should contain policies that seek to promote active lifestyles in the borough by protecting and maintaining open spaces and	The SA objectives should contain a measure seeking to enhance the health wellbeing levels in the borough.

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<p>and sport</p> <ul style="list-style-type: none"> enable the Lewisham community to develop its potential in sport develop appropriate infrastructure. <p>Social Inclusion Strategy 2005-13</p>	<p>improving the quality of sports facilities in the borough.</p>	<p>The SA objectives should contain measures to promote social inclusion, measured by the AAP's efforts at improving urban design, transport, education and promoting health and well-being in the borough.</p>	
<p>This strategy centres around five broad themes. It identifies the links between the council's existing strategies and services to enable more joined-up working.</p>	<p>Social sustainability must be a key element in the AAP. Enhancing social inclusion is a key aspect of social sustainability. This requires the promotion of sustainable transport and accessibility for all, implementing good urban design principles and the promotion of health, well being and education for all in the community. Good urban design principles will also enhance social inclusion.</p>		
<p>The key objective is the protection and enhancement of areas suitable for wildlife in the borough and to increase citizens' access to nature, even in urban areas.</p> <p>Local Biodiversity Action Plan – A Natural Renaissance For Lewisham</p>	<p>The AAP should aim to protect and enhance local biodiversity across the borough, including in urban areas and areas that are set for regeneration.</p>	<p>The SA objectives should contain a measure to protect and enhance biodiversity across the borough.</p>	
<p>Focuses on delivering the right housing mix to meet the housing needs and aspirations of all the borough's residents and achieving the wider goals expressed within the SCS.</p> <p>Lewisham Housing Strategy 2009 - 2014</p>	<p>The AAP should be in compliance with the London Plan targets on housing and housing tenure.</p>	<p>SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure.</p>	
<p>The Strategy complements the objectives of the Lewisham Housing Strategy. Key priorities include:</p> <ul style="list-style-type: none"> preventing homelessness arising where possible and promoting housing options providing long term and sustainable housing protecting and providing support for vulnerable adults and children who are homeless or faced with homelessness promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment <p>Brighter futures: Lewisham's Homelessness Prevention Strategy 2009-2014</p>	<p>The AAP should be in compliance with the latest London Plan targets on housing and housing tenure. The London Plan sets a high affordable housing target that should help meet the objectives of the Strategy.</p>	<p>SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure.</p>	

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<p>Lewisham Children and Young People's Plan 2009-2012</p>	<ul style="list-style-type: none"> reducing Youth Homelessness. <p>The Plan focuses on implementing actions to improving a number of key outcomes for children and young people which will improve their lives and life chances.</p>	<p>The AAP must include policies on education, health and well being, employment, open space and community facilities that will improve the life prospects for the borough's young people.</p>	<p>The SA objectives must include measures that will improve the life outcomes for residents – these can include measures on promotion of education, employment, housing and leisure and community facilities.</p>
<p>Creative Lewisham – Lewisham Cultural and Urban Development Commission</p>	<p>The report details a vision of Lewisham as a visually exciting, creative and imaginative hub, creating a synthesis between urban design, arts, culture and the economy.</p>	<p>The AAP should seek to adopt best practice urban design principles that will maximise sustainability in the borough.</p>	<p>SA objectives as a whole should include measures that will result in a vibrant and dynamic borough.</p>
<p>Safer Places: The planning system and crime prevention</p>	<p>The report offers advice on planning considerations relating to crime prevention. It establishes design principles for all new development which seek to reduce crime and the risk of crime.</p>	<p>The AAP should include a policy promoting best practice urban design principles that among other things aim to design out crime.</p>	<p>The SA objectives should contain measures that seek to reduce crime and other anti-social behaviour.</p>
<p>Draft Lewisham Municipal Waste Strategy 2004/05 – 2009/10</p>	<p>The objectives of the strategy are to:</p> <ul style="list-style-type: none"> minimise Lewisham's annual growth in waste to ensure it is less than the national 3% average increase the amount of household waste that is recycled and composted ensure 100% of Lewisham's population is served by recyclable kerbside collection or bring facilities, and to provide sufficient strategically located facilities for bulky household waste. Disposal. 	<p>The AAP should contain policies that promote the waste hierarchy and comply with the London Plan targets on waste minimisation.</p>	<p>The SA objectives should contain a measure that promotes the waste hierarchy and seeks to minimise the generation of waste.</p>
<p>Lewisham Carbon Reduction and Climate Change Strategy 2008</p>	<p>The Strategy is based on achieving a lasting and sustained decrease in emissions of CO₂ working with strategic partners and with citizens to:</p> <ul style="list-style-type: none"> reduce demand for energy increase energy efficiency increase the use of renewable energy tackle fuel poverty 	<p>The AAP should contain policies that will reduce the carbon footprint in the borough.</p>	<p>The SA objectives should include measures that aim to reduce the borough's carbon footprint.</p>
<p>Lewisham Local Air Quality Action</p>	<p>The key aim is to bring about change to</p>	<p>The AAP should adopt policies that</p>	<p>The SA objectives should include a</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Plan 2008	reduce emissions (NO ₂ and PM ₁₀) from main source of pollution (road transport) in a cost-effective and proportionate way. This is to be achieved by establishing four Area Quality Management Areas (AQMA) with designated geographical boundaries.	promote landuses and activities with minimal impacts on air quality.	measure that seeks to improve air quality across the borough.
School Organisation Plan for the London Borough of Lewisham (2004-2009)	The plan sets out the Education Authority's vision for education in the borough over the period of the plan. Within this context it sets out a strategy which will guide our approach to the planning of school places.	The AAP should contain a policy that supports the enhancement of schools across the borough under the Building Schools for the Future Programme.	Sustainability objectives need to consider the adequate provision of school facilities to promote higher standards of achievement.
Environment Agency State of Environment Report for Lewisham (November 2010)	Highlights environmental facts and data for Lewisham	The AAP should take the findings of the EA State of the environment report into account when developing its preferred spatial plan for the borough.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
FOUR COUNCIL STUDIES THAT INFLUENCE THE AAP			
Lewisham Strategic Flood Risk Assessment (2008)	In accordance with PPS25, the study identifies and provides advice to the Council on the suitability of development in areas at varying risks of flooding across the borough.	The AAP should take the findings of the Flood Risk Assessment into account when developing its preferred spatial plan for the borough.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
Lewisham Flood Risk and Development Sequential Test (2009)	In accordance with PPS25, the aim of the sequential test is to identify potential development sites and steer development to areas at lowest risk of flooding. Where there are no reasonable alternative sites in an area of lower flood risk, authorities must ensure that measures are incorporated that render the proposed development's vulnerability to flooding appropriate to the probability of flooding in the area.	The AAP should take the findings of the Flood Risk Assessment into account when developing its preferred spatial plan for the borough.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
Lewisham Local Implementation Plan (Transport) (2006)	The Local Implementation Plan (LIP) is a statutory plan to implement the London Mayor's Transport Strategy. The Greater London Authority Act 1999 requires the London borough councils to each prepare a plan (a Local Implementation Plan) to	The AAP policies on transport should reflect the objectives of the LIP.	The SA objectives should contain a measure that seeks to reduce car travel and increase the use of sustainable transport modes.

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<p>Lewisham Borough-wide Transport Assessment (2009)</p>	<p>implement the Strategy within their area.</p> <p>The objective is to produce an integrated multi-modal strategy to support the two preferred spatial growth options.</p>	<p>The transport policies in the AAP should take the recommendations of the transport assessment into account.</p>	<p>The SA objectives should include a measure that seeks to reduce car travel and improve the use of sustainable modes of transport.</p>
<p>Deptford and New Cross Transport Infrastructure Study (2008)</p>	<p>The study builds on a masterplan prepared for the area. It provides an understanding of the likely travel impacts of new development in the study area and gives commentary on the justification for new investment and a general approach to travel strategies.</p>	<p>The AAP should take the recommendations of this transport infrastructure study into account.</p>	<p>The SA objectives should promote the use of sustainable transport modes in new developments.</p>
<p>Lewisham Town Centre Transport Study (2009)</p>	<p>The study provides an understanding of the likely travel impacts of new development in the Lewisham Town Centre and gives commentary on the justification for new investment and a general approach to travel strategies.</p>	<p>The AAP should take the recommendations of this transport infrastructure study into account.</p>	<p>The SA objectives should promote the use of sustainable transport modes in new developments.</p>
<p>Lewisham Employment Land Study (2008)</p>	<p>This study assesses the future demand for employment land, compares it with the land supply under current planning policies and in light of the council's preferred spatial options makes policy recommendations on how far existing employment sites should be safeguarded from redevelopment for other uses.</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies.</p>	<p>The SA objectives should include a measure that encourages and promotes the development of employment opportunities in the borough over the long term.</p>
<p>Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA)(2009)</p>	<p>The report is the result of a joint collaboration between the Council and Lewisham Primary Care Trust (PCT). The JSNA identifies key themes for action aimed at improving long term health in the borough. This will allow the LSP and its individual partners to identify existing and future health needs of the borough and will influence the long term commissioning priorities of health infrastructure providers in the borough.</p>	<p>The JSNA will inform the development of the AAP spatial development policies.</p>	<p>The SA objectives should include a measure that seeks to improve the health and dwell-being of the borough's residents.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>Lewisham Leisure and Open Space Study (2009)</p>	<p>This strategy aims to provide:</p> <ul style="list-style-type: none"> • a PPG 17 compliant review • a borough playing pitch strategy • An implementation and prioritised investment plan for the Playing Pitch Strategy. 	<p>The AAP should include policies on open space to ensure:</p> <ul style="list-style-type: none"> • adequacy and quality of Open space (distribution) • protection of open space and biodiversity from development and enhancement where possible • Hierarchy of open spaces (MOL, POS, UGS). 	<p>The SA objectives should include measures to protect and maintain open spaces and biodiversity across the borough.</p>
<p>Lewisham Retail Capacity Study (2009)</p>	<p>The Study assesses the existing and future supply and the capacity for additional retail floorspace within the borough and the role played by each of the nine Major and District Town Centres.</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to retail and town centres.</p>	<p>The SA objectives should include a measure that seeks to attract new investment and maximise sustainable economic growth in the borough.</p>
<p>Lewisham Strategic Housing Market Assessment (2008) and the South East London Sub-regional SHMA (2009)</p>	<p>The SHMA assesses housing provision and need within the borough and the five south east London boroughs. It outlines recommendations for the level of affordable housing and tenure mix, and identifies areas as well as specific groups within the borough and sub-region who may have different housing requirements.</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to housing provision, mix and affordability.</p>	<p>The SA objectives should include a measure that seeks to facilitate housing provision, including its mix and tenure, and to ensure decent homes for all.</p>
<p>Lewisham Infrastructure Delivery Plan (IDP) (2010)</p>	<p>The IDP provides details of current and future provision of a range of social, physical and green infrastructure, arising from population growth both natural and from potential new development.</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to the provision of infrastructure.</p>	<p>The SA objectives should include a measure that seeks to provide a range of physical, social and green infrastructure and ensure these facilities/services are accessible.</p>
<p>South East London Boroughs' Waste Apportionment Paper (2010)</p>	<p>The waste paper shows how the South East London boroughs' will manage their waste apportionment as shown in The London Plan.</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to the management of waste and the allocation of suitable waste sites within the borough.</p>	<p>The SA objectives should include a measure that seeks to minimise the production of waste and ensure its effective management.</p>
<p>Lewisham Tall Buildings Study (2010)</p>	<p>The study identifies those areas of the borough where tall buildings may be acceptable</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP</p>	<p>The SA objectives should include a measure to ensure building design impacts positively on the environment</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>Ravensbourne River Corridor Improvement Plan (2010)</p>	<p>The improvement plan provides an analysis of the river's character and shows how development and recreation uses along its route can protect and enhance its key characteristics.</p>	<p>This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to the protection and enhancement of the Ravensbourne River Corridor and the activities along its length.</p>	<p>including historic assets.</p> <p>The SA objectives should include measures to ensure the protection and enhancement of open space, biodiversity conservation, promotion of walking and cycling, management of flood risk and appropriate mitigation, enhancement of townscapes and landscape, provision of opportunities to enhance health and well-being and access to leisure services.</p>

APPENDIX 4: Consultation results

The following table provides a detailed summary of points raised by stakeholders in recent consultation with respect to Lewisham Town Centre. The majority of consultation recorded relates to the programme of engagement which was undertaken during the preparation of the Lewisham Town Centre Development Strategy.

ISSUES RAISED
<p>Consultation from Urban Renaissance in Lewisham project (undertaken in 2002 by Todd Strehlow)</p> <p>Views on range of options for Lewisham Gateway scheme and TC as a whole. Summarised as follows:</p> <ul style="list-style-type: none"> • There is very strong support overall for the principle of the 'Low H' option for redevelopment, with the notable exception of the business community. There is a minority view among residents that the roundabout should be retained. • In addition to their views on the options, the public expressed views on a wide range of other topics. The four main ones, which emerged time and again across all consultation formats, were: <ul style="list-style-type: none"> – Widespread dissatisfaction with the roundabout - whether from a pedestrians', or cyclists', or motorists' point of view. Most people wish to see the roundabout removed or very substantially altered. – Dissatisfaction with the current retail offer in the town centre - both its range and quality. Many spoke of the proliferation of sports and discount shops, and lament the lack of a department store. – There is very strong interest in seeing a wider range of improvements to the town centre, particularly to the quality of the environment of the High Street (in terms of management, maintenance and traffic) and the range of activities and facilities found there. – Environmental factors rank the highest on a range of concerns about the town centre as a whole and future development. • Many residents would like the quantity of public open space in the town centre to be maximised. • Widespread view that the centre is simply unattractive. <p>Further information available.</p>
Steering group meetings (Lewisham Town Centre Development Strategy)
<p>Review of output and project steer</p>
Lewisham Town Centre Walking Audit Event
<p>The consultation event centred around a walking audit of Lewisham Town Centre, where participants were asked to identify the key problems in the area and dreams for the future. Following the walking audit, workshops were held to identify solutions that would enable the problems to be addressed and the dreams to be realised.</p> <p>A number of priorities were identified at this event, including:</p>

ISSUES RAISED

- Far greater access should be provided to the rivers within Lewisham;
- Trees and green spaces should be promoted throughout the town centre;
- Frontages should be improved, particularly in Ladywell and facing onto the sculpture park;
- Existing landmark features should be improved and upgraded;
- Signage should be upgraded and improved throughout the town centre;
- Lewisham Gateway features should be established;
- A brand or corporate identity should be developed for Lewisham which is used in all street furniture;
- Upgraded public highways with more activity and vibrancy;
- Pedestrian linkages across busy public highways should be improved;
- General improvements to the pedestrian environment throughout the town centre;
- Provision of sports and leisure facilities for all cultures and ages;
- The market represents a key opportunity for enhancement.
- The introduction of more cafés, restaurants and leisure facilities within the town centre; and
- A better choice of shops including more department stores.

See Consultation report for further details.

spreadsheets also available for:

- exact contents of post-it note exercise for Dreams workshop; and
- all people who were formally invited to attend.

Lewisham Information Day

Representatives of the consultant team attended Lewisham Information Day from 10am to 6pm on Friday 26 March. A number of different exhibitors displayed information at the event which took place in a marquee adjacent to the street market on the High Street. A small display was produced which summarised the aims, objectives and opportunities for Lewisham Town Centre Development Strategy. Accompanying the exhibition was a short questionnaire seeking to find out peoples views regarding potential themes for development. Members of the consultant team and Council officers were available to discuss the project with people throughout the event.

Feedback at the event was extremely positive, with a strong sense of commitment to the town centre and the potential to make improvements. The exhibition and questionnaire were also posted on the project website (www.lewishamtowncentre.co.uk).

ISSUES RAISED

48 people completed and submitted questionnaires which have subsequently been analysed and fed into ongoing wider consultation.

The main focus of the questionnaire was to establish the level of priority which people attached to various thematic development opportunities. These priority areas were:

- Environment;
- Economy;
- Transport; and
- Residential and community.

Respondents were asked to select a number from 1 to 4 depending on how important they considered the development opportunity to be (1= Not important; 2= Don't mind; 3= Quite Important; 4 = Extremely important).

An analysis of the questionnaires demonstrates that participants consider that Lewisham town centre would benefit from all potential development themes attaching varying degrees of importance to these. In order to rank the development themes, each theme has been given a score depending on the number of people who considered it to be 'Not important', 'Don't mind', 'Quite important' or 'Very important'. The table below uses a points system to rank themes in order of priority.

Rank	Category	Theme	Score
1=	Improve community safety	Residential & Community	100
1=	Improvements to the High Street environment	<i>Environment</i>	100
3	Improve the pedestrian environment	<i>Transport</i>	90
4	Create new green spaces	<i>Environment</i>	87
5	Improve access for elderly and disabled people in the town centre	<i>Residential & Community</i>	86
6	Improve Lewisham's shopping	<i>Economy</i>	83
7	Provide new facilities for young people	<i>Residential & Community</i>	73

ISSUES RAISED

8	Provide new community facilities	<i>Residential & Community</i>	71
9	Provide better links across the town centre	<i>Transport</i>	70
10	Improve the road network around the town centre	<i>Transport</i>	69
11=	Create more places to sit and relax	<i>Environment</i>	65
11=	Provide more leisure opportunities	<i>Economy</i>	65
12	Develop a vibrant evening economy	<i>Economy</i>	62
13	Enhance Lewisham's Rivers as a focus for the town	<i>Environment</i>	60
14	Improve the cycle network	<i>Transport</i>	54
15	Create new high quality residential neighbourhoods	<i>Residential & Community</i>	48
16	Provide more space for small businesses	<i>Economy</i>	47

For further detail see consultation report.

Spreadsheets available showing full questionnaire responses (questionnaires anonymous)

Letters to landowners

Responses resulting in meetings are listed below:

Stakeholder meetings (Lewisham Town Centre Development Strategy)

As part of the consultation process, a number of meetings were undertaken with stakeholders. A number of issues were raised which are summarised below:

Lewisham Gateway development

- Development strategy will help to integrate areas which fall outside the sphere of the Urban Renaissance in Lewisham initiative Development potential
- Feedback from landowners conveyed a sense of optimism for the town centre
- Debenhams viewed as a trigger for higher quality retail

ISSUES RAISED

- Cinema and high quality fashion outlets would be welcomed
- Opportunity at southern end of High Street around Molesworth Street junction
- Commercial opportunities relating to proximity to Canary Wharf
- Ladywell is an asset and 'Ladywell Village' provides an opportunity to encourage development of niche uses and the restoration of historic properties in the area.

Design and scale

- High density but sufficient outdoor space
- Encourage people to linger, not pass through
- Link between Lewisham Gateway and High Street is critical
- Open up rivers
- Emphasis on sustainability including mix of uses on sites (retail and residential)
- Residential development is a vital component for the Town Centre

Lewisham's rivers

- consideration of flooding as a constraint
- restoration of rivers
- opening up rivers, increasing pedestrian access
- naturalisation works in appropriate locations

the Lewisham Centre

- Shopping centre performing well
- Leisure Box facility on upper floors is a development opportunity
- Presence of Shopmobility should be retained

Evening Economy

- More diverse evening economy with cafes, bars and restaurants

High Street, shopping and market

- Shops and street markets are priorities, and vibrancy and range should be protected and enhanced
- More strategic vision for market with a coordinated approach to services (see table below)
- Better demarcation between pedestrian and vehicle space

Transport

- Good links are an asset
- Poor pedestrian environment with opportunities for better walking and cycle links
- Waterlink Way and improved access to rivers present an opportunity

Community issues

- Affordable and accessible facilities for young people are crucial
- SRB funding for a 'community asset' is available

Green space

ISSUES RAISED
<ul style="list-style-type: none"> - Green space is lacking and it is important to create more formal open space and green elements within individual developments
<p>Council officer led briefing on key town centre sites in brief in addition to brief.</p>
<ul style="list-style-type: none"> - Informed Cllr Moore of LTCDS context including consultation - Confirmed importance of consulting with SRB board members and board as a whole - Informed consultant team of political sensitivities of certain sites and issues (e.g. leisure centre provision, schools provision, market)
<p>Council feedback on priorities Transport</p> <p>Various options/issues for Town Centre:</p> <ul style="list-style-type: none"> - Management scheme for Lewisham High Street and Lewis Grove; - Congestion is a problem; - Pedestrian safety issues; - Reduce bus traffic congestion in High Street; - H junction and re-configured roundabout through interchange redevelopment - Review Sundial roundabout
<p>Discussion about potential for expansion in new or existing site(s) in Lewisham Town Centre and other parts of the borough.</p>
<p>Context</p> <p>Emphasis on Thames Gateway context</p> <p>Lewisham Gateway site</p> <p>Should interact with appointed Lewisham Gateway team. It is the right approach not to be constrained by the indicative urban design of the Lewisham Gateway.</p> <p>Key issue is how to get from station/DLR to the High Street. Potential for bridge or underpass.</p> <p>Other key issues</p> <p>Sustainable living policy determines a wider definition of the town centre.</p> <p>Town centre has high PTAL and there is potential to intensify public and private residential areas.</p>

ISSUES RAISED

It was agreed that the identification of potential sites for intense uses is a positive step at this stage of the project.

Encourage an active frontage on Molesworth Street

- Current baseline position in centre (e.g. rents)
 - Car parking capacity, potential to increase
 - High Street units are in individual freehold
 - Support the market and any improvements
 - Potential for active frontage on Molesworth Street limited by practicalities of servicing/storage arrangements in current unit configurations
 - Potential for redevelopment of leisure box
- Traffic, potential to improve access to centre car park
Support improvements to evening economy
Discussion about aspirations for Shopping Centre (which is now in new ownership)

- Important to consider LTC beyond the Lewisham Gateway

- Potential for radical alterations to road and rail network

- Animate Molesworth Street (more active frontage, or not possible, more active entrance/exit points)

- Three assets / good things / selling points of the town centre
 - ✓ Street market – popular, vibrant, nice mix of products, gives town centre a buzz
 - ✓ Retail mix is popular with locals, vibrant
 - ✓ Public transport links
- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Street market! – Needs more strategic vision, creates mess & refuse, needs upgrading, signage, needs traffic order to stop improper parking, sort out compactor
 - ✓ Lighting – especially in market area, forms part of perception of the town centre in evening as an unsafe place; wasted opportunity
 - ✓ High Street – traffic management especially, clogged up with buses and cars; may always be conflict but current plans are a step forward progress
- Three top priorities for the town centre?
 - ✓ Continued investment

ISSUES RAISED

- ✓ Raise profile of town centre; change perception among punters
 - ✓ Sort transport problems, especially for pedestrians

 - Lewisham town centre in 10-15 years
 - ✓ Hopes that overall objectives of SRB will have been achieved
 - ✓ Market still here and upgraded
 - ✓ Still recognisable but greatly improved
 - ✓ Need a 'closure' of the vision – implemented, practical, attention to detail, "finished and signed off"

 - Views development sites
 - ✓ Cinemas!
 - ✓ Improved access for disabled people, hope to achieve this on back of Lewisham Gateway scheme
 - ✓ Via town centre management and section 106 – new entities to address strategy and community concerns
 - ✓ Sites for more upmarket fashion
 - ✓ Sites for business incubation, start-up offices – there are hardly any now, especially needed for ethnic minority businesses
 - ✓ Model Market is neglected – hopes will stay but be upgraded; perception that it's not safe (not the reality)
 - ✓ Would be a shame if the southern end of shopping centre (& Model Market) was just demolished and replaced with a big new scheme

 - Views on scale of development
 - ✓ Generally OK with scale of Lewisham Gateway and similar schemes

 - Specific hopes for the Urban Design Framework
 - ✓ Pleased that it's being done
 - ✓ Helps to tie in areas that aren't the central focus of Urban Renaissance / SRB
 - ✓ Good timing
 - ✓ Need a co-ordinated approach to the area, look at issues that can't be dealt with by Urban Renaissance – especially the south end of the town centre, Lee High Road businesses, and those who suffered through Lewisham 2000

 - Other ideas and issues
 - ✓ Market – what it needs: sort traffic order, new stalls, new canopy(ies), lighting, signage, sort refuse
- Site potential for Thurston Road, and general discussion regarding LTC
- General progress overview by UP.
- Noted that many board members would be consulted on a one-to-one basis (see other stakeholders)

ISSUES RAISED

- Three assets / good things / selling points of the town centre
 - ✓ Rivers – chance to enhance the environment
 - ✓ Lots of people coming into the area, passing through – but we're not taking advantage of them
 - ✓ Market – though needs a 'bit of a lift'

- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Car parking – sheer lack of it; concern at new facilities not having enough or any (e.g., new police station)
 - ✓ Rivers – challenge of flooding
 - ✓ Lack of department store
 - ✓ Quality of shops not up to scratch

- Three top priorities for the town centre?
 - ✓ Leisure centre & sport – something for young people (queries what facilities Lewisham College would have?)
 - ✓ Department store – hopefully Debenhams will come
 - ✓ Evening economy – likes Fulham Broadway triangle development (multiplex, restaurants)
 - ✓ Budget hotel – maybe e.g., Holiday Inn Express

- Lewisham town centre in 10-15 years
 - ✓ Lots of enthusiasm – 'A Number 1 Town – competing with the best' like the West End, Bluewater, Bromley, Lakeside. Debenhams is essential to start this off, lead to a better class of shop.
 - ✓ South end of shopping centre needs something but we also need to retain some speciality outlets (both there and throughout the centre).
 - ✓ Does not want a town that's the same as everywhere else. Need an individual personality, but not certain how to achieve this.

- Views development sites
 - ✓ No comment.

- Views on scale of development
 - ✓ Generally OK with the scale of development proposed, for example on the Lewisham Gateway site.

- Specific hopes for the Urban Design Framework
 - ✓ Put Lewisham back on track to be what it was 30 years ago.

- Other ideas and issues
 - ✓ A model would help people to visualise how X, Y, Z is going to happen.

ISSUES RAISED

- Three assets / good things / selling points of the town centre
 - ✓ Market
 - ✓ Rivers – one occasionally sees them, but then not sure where they go
 - ✓ Waterlink Way

- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Pedestrian routes poor, busy streets to cross
 - ✓ River – currently just a drainage channel, not much to look at – opportunity to break down walls such as at Quaggy Gardens

- Three top priorities for the town centre?
 - ✓ Improve appearance of rivers
 - ✓ Real opportunity in Lewisham Gateway site to open up rivers
 - ✓ Improve / manage flood risk

- Lewisham town centre in 10-15 years
 - ✓ Thriving, attractive centre
 - ✓ Not just a place to get in and out and leave quickly, but enjoy and linger
 - ✓ Clearer to navigate and cross roads and railways

- Views development sites
 - ✓ Ladywell – low scale development in keeping with Victorian context

- Views on scale of development
 - ✓ No comment.

- Specific hopes for the Urban Design Framework
 - ✓ Establish key principles
 - ✓ Highlight importance of rivers
 - ✓ Clear commitment to the riverside treatments
 - ✓ Aspiration to improve the rivers
 - ✓ Pedestrian routes along the rivers
 - ✓ Manage flood risk
 - ✓ Rivers not an afterthought, but made the most of from the start

ISSUES RAISED

- Other ideas and issues
 - ✓ Natural river bank would be ideal, but open to ideas
 - ✓ Possibility of a 2-stage channel with various uses – perhaps including footpaths which might flood at high water levels
 - ✓ EA has been happy with the process so far; they've been involved and consulted
 - ✓ Need access along the rivers for maintenance – 8 metres either side is the standard to aspire to – this zone should be free of permanent solid obstructions; public access is acceptable within the 8 metre zone
 - ✓ Lidl, Lee High Rd – seeking naturalisation works and a decrease in overshadowing, negotiations seem to be going OK
 - ✓ Seek break out of Quaggy at police station, or at least some surface features to show that it is there
 - ✓ Have been major works nearby, e.g., Sutcliffe Park, also studies of Lee High Road
 - ✓ EA seeks opportunities as development comes along
 - ✓ Is the duty of riparian owners to maintain flood defence and not block the flow; EA inspects, can give grant in very exceptional cases
 - ✓ EA's recreational duty – access along rivers, seeking new routes; most EA funding is just for flood defence works, but work successfully in partnership

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Three assets / good things / selling points of the town centre

- ✓ Market – potential for improvement, e.g., cover, diversify goods on sale... a good base to build upon
 - ✓ Good public transport routes and connections
 - ✓ Diverse population – some interesting shops, potential for more
 - ✓ Tesco as an anchor, also provides parking
- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Car access and parking is very limited, but addressing this may clash with residents' needs
 - ✓ Aesthetics – the area looks a mess, a mix of styles, lack of green space
 - ✓ Quality of shopping offer – they come because it's cheap, not due to quality or bulk
 - ✓ Wasteland between interchange and shopping areas – Lewisham Gateway scheme should address this
 - Three top priorities for the town centre?
 - ✓ Link Lewisham Gateway to shopping area, plus anything to make area more pleasant, green; open rivers up; art
 - ✓ Improve quality of shopping offer – more upmarket, more diverse – provide more reason to linger, including cafes and restaurants; more 'continental'
 - ✓ More people living in the area, esp. families, but they need to feel safe; need to counter 'yob culture'
 - Lewisham town centre in 10-15 years
 - ✓ More vibrant centre, niche shops, more places to linger and socialise, interaction between communities
 - ✓ Focus on making Lewisham an attractive residential area – don't put all our eggs in the retail basket as trends may change
 - ✓ More green
 - ✓ First class architecture – something to come and look at – so that 'the anonymous centre becomes remarkable'

ISSUES RAISED

- ✓ Less reliant on cars, pedestrian friendly, good balance with public transport
 - Views development sites
 - ✓ Model Market – improve access and visibility; ‘agnostic’ on whether to improve what’s there or redevelop
 - ✓ Ladywell Baths – would like leisure centre to survive in place, is a better location for many residents; any new centre must be affordable and easy to get to
 - ✓ Ladywell Village – there has been some opposition to a new secondary school in Ladywell; potential for niche restaurants and bars; village feeling; build on strengths
 - Views on scale of development
 - ✓ Should be of a human scale, not like the police station or shopping centre
 - ✓ The most interesting places have evolved organically
 - ✓ Should be sustainable by being underpinned by residential development, not just retail-led; must be convenient and walkable and facilitate local interaction
 - ✓ For a ‘continental’ centre one must accept high density
- Specific hopes for the Urban Design Framework
- ✓ Nothing specific
- Other ideas and issues
- ✓ Noted that the Walkabout attendees were not representative of the ethnic mix of the area
 - ✓ Noted that in the recent campaign, bus overcrowding and unreliability were big issues. Education did not feature much in the campaign, as might have been expected.
 - ✓ High Street – high accident rate; fears currently proposed scheme may not deal with the volume of traffic, will need to monitor; high concentration of bus traffic there, and Lewisham generally

- Discussion relating to potential for Gilmex site at Conington Road and wider LTC.

- Possibility that existing uses will relocate
- Potential for residential-led mix (to complement adjacent Venson site)
- Noted that Tesco are also considering options for their adjacent site

ISSUES RAISED

- Discussion relating to Bridgehouse Trust owned land in LTC (Model Market and units on Engate Street)
- Potential for 'southern gateway' development, to create a balance to the interchange development
- Complex leaseholder scenarios

- Three assets / good things / selling points of the town centre
 - ✓ Easily accessible by transport
 - ✓ 'Has most shops I want'
 - ✓ Good market

Three greatest liabilities / problems / shortcomings of the town centre

- ✓ Without things for young people, they will get frustrated and anti-social behaviour could result. Currently no venue to meet, and just two outreach workers. There will be more young people hanging about in any event, with the new Lewisham College campus. Facilities must be affordable for young people. Plans she's seen so far may be missing these elements; fear of not including them.
- ✓ Shops take space on pavement, hinder access, possible threat to market

Three top priorities for the town centre?

- ✓ Develop a community asset, with £600k set aside
- ✓ Things for young people
- ✓ Bring in people through consultation

Lewisham town centre in 10-15 years

- ✓ 'Will be fabulous and attractive!'
- ✓ Will be tidied up, stations improved, pedestrianised area, better shops; there is hope for the town centre

Views development sites

- ✓ Some existing businesses will lose out, by not being able to compete with things in the new developments

Views on scale of development

- ✓ Concern about whether we might be building the ghettos of the future – outlook good for 10-15 years, less sure about 30 years; not enough family accommodation

- Specific hopes for the Urban Design Framework

ISSUES RAISED

- ✓ That it take on board the views aired at the Walking Audit and elsewhere
- Other ideas and issues
 - ✓ Thought we could do some extra mini-walking tours/audits as part of the consultation, covering different parts of the centre of different groups; otherwise happy with consultation process for the study, does not see need for other additional work
 - ✓ Regularly gets 25+ people for her 'Lunch, Munch and Listen' sessions for over 55's
 - ✓ Will start 'Early Evening Express' sessions also, aimed at commuters / those who are busy during the day
 - ✓ Malcolm Exon new URL board member (United Reformed Church)
 - ✓ Circle 33 manage the central Lewisham council housing stock
 - ✓ Wardens are pivotal in the town centre – on site every day, they need to be well informed and up-to-date (Eden Geddes, head of town centre team)
 - ✓ Concern about future of Shopmobility – people need to be able to get around; Shopmobility has many users who bring in the £; only scheme in London which provides a helper to go around with you; they currently have a good deal from Slough – rent free plus maintenance
 - ✓ Liked the Walking Audit very much; was interested to see how close the views were between a wide range of interests
 - ✓ Newsletter to 8,500 going out 10 June

Potential for 'Community Asset' to be located in town centre through SRB funding (budget £600K). Possible locations include:

- The Lee Moor Centre (Clarendon Rise);
- Top of the library;
- Sundermead park (SRB);
- New central development; or
- Riverdate building on Molesworth Street.

Peter Head, a member of the London Sustainable Development Commission facilitated a Sustainability Workshop in Lewisham on Tuesday 25 May. This session was attended by a range of Council officers and other representatives, and provided an introduction to the Framework, and demonstrated how it can be used to inform joined-up creative thinking. This was undertaken using the Framework's four principles of sustainable development to guide the workshop.

The results of the brainstorming session are summarised with respect to each of these principles below:

Taking responsibility

"Sustainable Development depends on everyone taking responsibility for their own actions, and being aware of the impact of those actions on other people and the environment."

ISSUES RAISED

Consideration of the potential impact of proposals, the identification and participation of stakeholders in the planning process, long-term thinking, and a sense of ownership are essential components of sustainability. Attendees at the workshop considered that a comprehensive consultation process would engender a strong sense of ownership amongst a wide range of stakeholders, and it was recognised that consultation was a central component of the project programme.

There is also an emphasis on creating a sense of ownership of the Development Strategy across a wide range of departments in Lewisham Council, giving the document greater weight at a strategic and practical level.

Developing Respect

Developing respect relates to recognising diversity, and responding to the needs and aspirations of the community. The Sustainability Framework supports the creation of vibrant communities which are safe and defined by a strong sense of participation at a local level.

The Lewisham Town Centre Development Strategy has placed an emphasis on understanding the local community with an extensive programme of consultation, and socio-economic research. It was acknowledged that the borough's diversity has engendered a culture of tolerance and acceptance and that this should be celebrated.

It was noted that the Development Strategy should respect scale and character, with Ladywell and Lee High Road being prime examples of areas in the town centre with strong identities which should be enhanced by new development. The market was also identified as a major destination in the town centre, and an important cultural feature as well as an economic one.

Managing Resources

Managing resources reflects the environmental and physical aspects of sustainability, particularly with respect to biodiversity, open spaces and the built environment. This theme also describes the prudent, efficient and effective use, recycling and disposal of resources.

It was noted that aspirations for new residential communities in the town centre would contribute to a sustainable use of resources in the Town Centre, which is defined as a Sustainable Living Area (SLA). SLAs are zones where high density residential development is encouraged within walking distance of local facilities and public transport connections. SLAs can contribute to a reduction in demand for travel. Another aspect of the sustainable management of resources is the provision of high quality spaces, working with natural areas such as rivers. The Development Strategy will seek to provide such spaces through consultation and an in-depth urban design analysis.

Getting Results

Getting results emphasises the importance of achieving progress across a wide range of objectives including social, economic and environmental issues; delivering innovation; and providing access to services, facilities, housing, green space, good quality food, and cultural and leisure activities.

ISSUES RAISED

It was noted that the Development Strategy would be instrumental in this respect, providing a context for joined-up strategic thinking. The consultation process has established a dialogue with some key landowners, and developing effective partnerships with the private sector will be central to the delivery of key proposals within the strategy. The strategy will also provide the Council with a tool to achieve a desirable and sustainable mix of uses and improvements in Lewisham, and a mechanism for maximising planning contributions through s.106 agreements. The document will define a context for new houses, jobs, services, open spaces, leisure facilities and new development and will set a context for new development to be delivered to the highest possible quality.

The strategy will make links to other existing initiatives, situating them in a broader town centre context and thereby providing additional support.

• Lewisham market is one of very few six-day a week markets in the UK

- Safety on the High Street is a major priority for traders, who are aware of high incidence of accidents involving pedestrians. They believe that this is caused in part by unclear demarcation between pedestrian and vehicle space, and by buses traveling at speed down the High Street
- The traders are keen to see some investment in stalls in the market, and would welcome the extension of the shopfront grant scheme to cover market stalls
- There are issues associated with infrastructure in the market – the water and electricity supply and lighting arrangements were all put in as temporary measures and are in need of replacement and upgrading

The traders expressed concern at the shortage of parking facilities in the town centre, both for traders and members of the public. There is concern that the Lewisham Gateway and Debenhams developments will exacerbate this issue, as some parking will be lost, and congestion will worsen.

Safety is the key issue in determining how well used car parks are in the town centre. It was acknowledged that the Riverdale Centre car park has been refurbished and improved, but it was thought that this should be better promoted, as some customers perhaps still associate this car park with the poor reputation it had prior to refurbishment and are therefore reluctant to use it.

- The traders expressed opposition to any potential proposal to alter the layout of the market, indicating that the existing layout is thought to work well, and that there would be concern about some traders having to move to less prime pitches, and a new layout discouraging customers from walking the full length of the market.
- The traders would like to see a permanent canopy in the market to protect customers from inclement weather and provide a more modern shopping environment. It was noted that a canopy had been designed as part of the Lewisham 2000 scheme, but that funding had not been secured.
- The traders would welcome investment in the stalls to provide a consistent appearance throughout the market
- The traders welcomed the recent introduction of pay and display parking in some areas of the town centre
- The current location of the compactor was discussed, and it was agreed that it is not necessary for it to occupy such a high profile location in the town centre.
- The traders would welcome further facilities to encourage recycling in Lewisham market, and suggested that with the introduction of such facilities it could be branded as 'the most recyclable market in London', providing positive publicity and reducing the need for the compactor.
- The issue of the poor visual appearance presented by the backs of stalls was discussed. The traders thought that this could be improved by the introduction of purpose-built storage units, which would also reduce the number of vehicular trips into the market which are generated by traders replenishing their stock throughout the day.

- Service parking arrangements

ISSUES RAISED

- Views of stall backs and compactor
- Toilet provision
- Canopy for market
- Power facilities
- Potential to consider market layout
- Three assets / good things / selling points of the town centre
 - ✓ Natural assets & geography; rivers
 - ✓ Transport links
 - ✓ People – mixed and friendly, makes for an interesting, safe and enjoyable place
- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Pedestrian area doesn't work – mix of buses and people space; ill defined; unsafe
 - ✓ No department store
 - ✓ Rivers look like drains, detract from the urban landscape in their current form
- Three top priorities for the town centre?
 - ✓ Restore rivers, bring back to life, can be attractive and make Lewisham unique
 - ✓ Smarten up area – it's untidy and unkempt, such as its paving, bins, posts
 - ✓ More open space where people can sit out and feel comfortable
- Lewisham town centre in 10-15 years
 - ✓ Desirable place to live (already is!) – and also perceived to be
 - ✓ Desirable place to work and shop
- Views development sites
 - ✓ Lewisham has a vibrant voluntary sector – would like them to have a visible presence in the commercial area (not just hidden around the back, etc). This could be a central premises with space for groups, offering services, provided right where people are going, centrally located; people should know of their existence and importance
 - ✓ Cinema, swimming pool – would like a mixed development but not sure of location for these facilities
- Views on scale of development
 - ✓ Strong gut feeling against tall buildings / going too high. Feels strongly that one reason Lewisham feels safe is its lack of tall buildings. They might affect people's feelings, actions.

ISSUES RAISED

- ✓ Not opposed to high density but there needs to be good outdoor space that people can feel comfortable in
- ✓ Danger of destroying the place if we go too high or too dense; be careful not to destroy our natural advantages

- Specific hopes for the Urban Design Framework
 - ✓ It is really, really important to involve the people who live, work and shop here – only by understanding them will the plans work
 - ✓ Hopes developers see the commercial advantage in creating attractive space

- Other ideas and issues
 - ✓ Draconian slowing of traffic on main roads – thinks traffic might flow better anyway and would help the feel of the place
 - ✓ Combine the rivers with footpaths – have low level footpaths near the water so people can get down there; would be accessible most of the time and be available for flood catchment when needed

- Three assets / good things / selling points of the town centre
 - ✓ Market – been there a long time, a big asset
 - ✓ High Street – very good at moment, could be much better
 - ✓ CCTV cameras – people are not as afraid to go out
 - ✓ Wardens
 - ✓ No-drink zone
 - ✓ Community projects – nice to see things happening; already good sense of this, has improved in the last five years – “long way to go, but people are talking about how good it is to be in Lewisham”

- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ High Street traffic – lots of elderly trying to cross; vans blocking access; needs to be sorted; need to have clear rules laid down and stick to them
 - ✓ Shops goods on pavement
 - ✓ “Not a great deal wrong with Lewisham”

- Three top priorities for the town centre?
 - ✓ Something for young people, esp. Monday to Friday afternoons when they come out of school; something to amuse, divert, keep out of mischief; can be intimidating for older people

- Lewisham town centre in 10-15 years
 - ✓ Will be vastly improved
 - ✓ Nice place to live (is now, will remain so)
 - ✓ Should always look to make improvements, not be stagnant
 - ✓ Look for better bars, culture – keep people in Lewisham

ISSUES RAISED

- Views development sites
 - ✓ No specific comment
- Views on scale of development
 - ✓ OK with what he's seen of the Lewisham Gateway proposals – “not obnoxious looking”
- Specific hopes for the Urban Design Framework
 - ✓ To make Lewisham a better place
 - ✓ Hope to maintain standard / pace of improvement
- Other ideas and issues
 - ✓ Hope developers have a long forward outlook
 - ✓ Lewisham 2000 did not make much impact
 - ✓ Good to get people interested – always seem to keep getting harder to do this; thinks Carole Long does a very good job
 - ✓ Make sure smaller businesses don't go out of business because of the big new ones – they've kept Lewisham going all these years; think of the small people
 - ✓ Surprised young people don't go into the Leisure Centre more
 - ✓ Diversity of culture in the area is “fabulous”
- Three assets / good things / selling points of the town centre
 - ✓ Easily accessible, especially by bus and rail – less so on foot
 - ✓ Market is “a plus” – a great add-on to the centre
 - ✓ Pedestrianised area – can put on events
- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Roundabout – “awful thing”
 - ✓ Known as “Pound shop city” – lack of really good shops, poor compared to Bromley, let alone others
 - ✓ Bus / pedestrian conflict in High Street – in an ideal world would be completely pedestrianised
- Three top priorities for the town centre?
 - ✓ Must be seen as “fashionable and classy”. Other places have changed in the last 20 years – why not Lewisham? Don't want it to be seen as downmarket.
 - ✓ Should be a place to come for shopping, cinema, eating out, leisure... Need to increase loyalty of existing catchment.
 - ✓ Needs a mix of uses to keep it open – it's dead at night

ISSUES RAISED

- ✓ Should be no barrier between interchange and town centre
- ✓ Green space, open up rivers, make environmentally pleasant
- Lewisham town centre in 10-15 years
 - ✓ Back to level of 'metropolitan centre', we should try to get there
 - ✓ Need leisure, restaurant, cinema – all the aspirations articulated in the SRB bid
 - ✓ The Lewisham Gateway scheme finished, sorted
 - ✓ If we get the current projects right, they should last for 20, 30 years or longer
- Views development sites
 - ✓ Don't want to lose Tesco or other major retail
 - ✓ Big winners will be those who get into the Lewisham Gateway scheme
 - ✓ No firm views on where certain uses should go
 - ✓ Wants affordable housing included
- Views on scale of development
 - ✓ If high rise is sought after, there should not be a problem; all about balance
 - ✓ Scale of Lewisham Gateway looks good
 - ✓ May be some trade off between green open space and development
 - ✓ Don't want concrete jungle but must accept that developers need to make money
 - ✓ All depends on the design – this is the tricky bit!
- Specific hopes for the Urban Design Framework
 - ✓ Want to encourage people and businesses in
 - ✓ Realistic and sustainable
 - ✓ Something to hope for
 - ✓ Must get it right, and not decide later that we want to pull it down!
- Other ideas and issues
 - ✓ Covered above
- Three assets / good things / selling points of the town centre
 - ✓ Market
 - ✓ Interchange / transport links

ISSUES RAISED

- ✓ DLR in particular
- Three greatest liabilities / problems / shortcomings of the town centre
 - ✓ Traffic volume – makes very pedestrian unfriendly. Biggest problem is the sheer fact of the A20 and A21 meeting here.
 - ✓ Lack of high-profile retail – it's "not the most sophisticated town centre"
 - ✓ No leisure amenities / facilities
- Three top priorities for the town centre?
 - ✓ Improve rivers
 - ✓ Improve pedestrian access
 - ✓ Improve standard of design – it's "all horrible". Need urban design / development which is appropriate to Lewisham and not just "ego driven". All about "liveability and workability".
 - ✓ Make Lewisham a satellite of Canary Wharf, in terms of offices and services (as had been envisaged years ago). Town centre should not just be retail-based, but be a major place of employment
- Lewisham town centre in 10-15 years
 - ✓ Hope it's a place where people want to be, live
 - ✓ Should be one of the top desirable boroughs in the South East
 - ✓ A place where people want to go, a hub of activity
 - ✓ Location for business and industry
- Views development sites
 - ✓ No specific views on the role of individual sites
 - ✓ All down to economics but we must respond positively when applications come in
- Views on scale of development
 - ✓ Development is bound to be dense, but will the quality be good enough
 - ✓ Might be better to lose some floorspace if we could create a better environment
 - ✓ Smaller scale in some cases could actually be more valuable
- Specific hopes for the Urban Design Framework
 - ✓ Would like to see green roofs feature
 - ✓ Address nature conservation and wider sustainability issues
 - ✓ Enhance public amenity
 - ✓ Flood amelioration
 - ✓ Interconnection of green space – a 'green grid'. Can each development add something positive to the green grid?

ISSUES RAISED

- ✓ Series of pocket parks
- Other ideas and issues
 - ✓ Would be great to deck over the roads, “just get rid of them”
 - ✓ Roofs of various heights – some could allow public access
 - ✓ Make it “one of the most sustainable town centres in London”
 - ✓ Green space should be part of any planning application
 - ✓ Access from station area towards Greenwich and estates north of the station important too
 - ✓ Roof spaces need to be activated – this is in the SPG but is “tame” and could go further
 - ✓ Consider the Swedish ‘green area factor’ model as means of judging sustainability of development proposals

Meeting between LTCDs consultant team and representatives of MFI, Allied Carpets and Workspace Group discussing potential for Loampit Vale area.

Comments from www.lewishamtowncentre.co.uk

Several comments have been received to date on the Development Strategy’s project website. A key concern was consideration of ‘green’ transport links such as cycling and walking. One stakeholder was supportive of the expansion of the existing bus stand area and redevelopment into a proper bus station, or redevelopment for new uses such as retail and offices.

The existing retail offer is perceived to be unsatisfactory due to a lack of specialist and higher order comparison goods. Certain retail units in the High Street are also perceived to be scruffy and untidy, and refuse collection was identified as an issue. An aspiration was expressed for the town centre to compete with nearby developments such as Canary Wharf, with a greater choice of quality clothing, footwear, eatery and independent retailers to attract money and consumers, and make the town a more vibrant place to live and work.

One comment praised the new civic space in the Lewisham Gateway development but expressed concern that this area would be aesthetic rather than functional. A continental mix of open air dining, drinking and art/craft stalls would assist in the creation of a more vibrant and active space which would attract local residents and visitors alike..

Full list of e-mails available.

Lewisham Town Centre Area Action Plan

(a) Sustainability

ISSUES RAISED

- Sustainability appraisal for the Core Strategy and AAP should be consistent
- AAP may have a more specific expression of generic objectives. A consistent framework is important as it will enable resources and information to be shared at the monitoring stage.
- sustainability appraisals will be useful as a tool for proposals and options.
- about 25 objectives
- Where possible the Sustainability Appraisal and evidence base should draw on baseline information from a range of sources such as the Health Impact Assessment for the Lewisham Gateway.

(b) AAP boundary

- LTC AAP provides an opportunity to review the boundary which is currently defined within the adopted UDP.
- various options for this including retention of the existing boundary, or a tighter border relating to the core retail area.
- key purpose of the AAP is to provide a framework for resolving development pressure.
- The Development Strategy demonstrated the possibilities and commercial interest in the town centre's peripheral sites including Lee High Road, Ladywell, and Coampit Vale, especially in relation to the potential for the Lewisham Gateway development to cause a shift in gravity away from the existing retail core.
- The boundary should also include Waterlink Way which is an important aspiration for the town centre.

(c) Lewisham Gateway

- Planning policy relating to the Lewisham Gateway site is set out in the Lewisham Gateway Planning Brief SPG. The Council has appointed a development partner to work on the project and the scheme is being taken forward over the next five years. The AAP will be allocated as a site the AAP (and identified as an option (evidence base used to rule out unviable options)

(d) Proposals sites / site allocations

- Potential proposals are likely to be included for the station area, and peripheral sites

(e) Shopping policy

- existing UDP defines shopping policy in terms of frontage, but an alternative option would be to characterise retail policy with an area-based approach. The frontage method is associated with an objective to protect designated frontage. This method is also understood to reinforce a separation between the two sides of the High Street.
- market would continue to be a priority for the Town Centre
- the Library-end of the High Street should be supported.
- Opportunities have been identified for the following, inclusion of evening economy uses as part of mix of uses in Lewisham Gateway and other Town Centre destinations; and mixed-use proposals with retail at ground floor and residential above;
- a major advantage for the AAP is that policy can be established in advance of the growth of the evening economy on the ground, enabling the resolution of potential

ISSUES RAISED

tensions.

(f) Parking policy / Sustainable Living Areas

- certain volume of car parking capacity is required for a retail centre such as Lewisham, especially given the Council's commitment to pursuing 'Metropolitan' status for LTC
- TfL's PTAL approach would need to be considered as part of a review of conventional standards.
- Conservation Area designation will also affect the approach to parking policy.
- suggested that no minimum parking standard should be set. Rather flexibility should be enabled through a maximum standard. Parking and storage continues to be a major issue for traders with shared permits with residents being a potential solution.

(g) Options

The concept of an options appraisal is a theme which will be applied across the AAP

(j) Other issues

As noted above, the market is an important focus for the town centre, and policies relating to this asset will be included in the shopping section of the AAP. The market is a potentially contentious site, and it is possible that the AAP process will not produce a definitive proposal or resolution. However, it was agreed that it would be a focus for the AAP process.

It was noted that a number of generic policies will be covered in the Core Strategy such as Urban Design policy, but certain aspects will be re-iterated within the AAP where necessary. Other policies will include open space, transport, housing and leisure.

It was noted that two versions of the AAP will be produced – a full report and a summary vision which is accessible for local stakeholders. On a more technical issue, it was recognised that all area-specific designations for LTC will need to be graphically represented within the AAP, but cannot be summarised on the overarching proposals map.

ISSUES RAISED

Issues and Options consultation

Date: September – October 2005

The following bullet points summarise the key findings from consultation on the Issues and Options report (please refer to Issues and Options report for further details on options):

HOUSING

ISSUE LTC1: The Borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?

- Consultees expressed support for all options.

ISSUE LTC2: The Council will seek to deliver and exceed an additional 9,750 homes to be built by 2016, of which 3,160 will be affordable housing. Should there be a specific town centre affordable housing policy?

- LTC2A was the favoured option

ISSUE LTC3: How best can the AAP process promote higher residential densities in areas of high public transport accessibility?

- Respondents support the idea of an integrated approach to transport and housing in areas of high public transport accessibility to promote higher residential densities.

ISSUE LTC4: How should the AAP make provision for the traveller community?

- The majority of consultees felt that the town centre was not an appropriate alternative location for a traveller site.

SHOPPING AND TOWN CENTRES

ISSUE LTC 5: How can Lewisham town centre best move towards Metropolitan Centre status?

- A majority of respondents favoured option LTC5B over option A.

ISSUE LTC6: How can Lewisham town centre's vitality and viability be best supported?

- The most popular options identified during the consultation process were options LTC6C and LTC6D.

ISSUE LTC7: If implemented Lewisham Gateway has the potential to bring wide ranging benefits to the town centre. How should the AAP address the issues associated with Lewisham Gateway?

- The majority of consultees stated a preference for option LTC7D.

ISSUE LTC8: What approach should the AAP take to the designations of core and non-core shopping frontages?

- Option LTC8C is supported by the majority of consultation respondents who wish for a geographical basis in designating retail zones which have scope to integrate a more diverse mix of uses to include evening economy. The GLA respond that the Mayor is likely to favour options C and D, advocating a holistic approach to the town centre.

ISSUES RAISED

ISSUE LTC9: How should the town centre's potential for a more vibrant evening economy be managed?

- Respondents support the promotion of evening economy uses in Lewisham town centre.
- Options LTC9C and D were supported by a large number of those consulted.
- Options A and B proved less popular.

ISSUE LTC10: Should the town centre boundary be altered?

- The majority of those consulted responded that option LTC10A was the preferred option.

URBAN DESIGN

ISSUE LTC11: What approach should be taken to the location and design of tall buildings in Lewisham town centre?

- The favoured option as identified through the consultation process is LTC11D. The GLA state that tall buildings should be tested by an assessment against design led criteria.

EMPLOYMENT AND BUSINESS

ISSUE LTC12: What policy approach should be taken to existing established industrial areas and business uses in the town centre?

- Options LTC12C and D were expressed as the most popular approaches to existing industrial areas and business uses in the town centre by consultation respondents. The GLA state that option A is the preferred option and that existing employment uses should be protected, unless a need based study shows that they are surplus to demand.

OPEN SPACE

LTC13: How should the AAP process seek to address open space provision within Lewisham town centre?

- All options are seen to have a role to play in ensuring the provision of high quality open space in Lewisham town centre and the preferred option is therefore a combination of these options.

TRANSPORT

ISSUE LTC14: Should parking standards for new development be reviewed?

- The majority of consultation respondents including the GLA expressed option LTC14B as their preferred option.

ISSUE LTC15: In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?

- Options LTC15A and B were identified by the majority of respondents as the most popular approaches to the provision of public/ shopper parking spaces. The GLA offer support for option A and Transport for London state that they are in favour of no new additional parking provision within the town centre for new development, encourage the better management and rationalisation of the existing town centre spaces, and support proposals which encourage the use of public transport.

ISSUES RAISED

ENVIRONMENT

ISSUE LTC16: How can the AAP seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne?

- Consultees stated a preference for option LTC16A as did the GLA stating that the restoration of both river channels should be a fundamental requirement of any major development proposals for the town centre.

LEWISHAM GATEWAY

- Consultees agreed on the principle of the area being designated an opportunity area, however no preferred options emerged with respect to site specific details.
- There is ongoing engagement with owners of Lewisham Centre regarding proposals for this opportunity area.
- With respect to the issue of how to support Lewisham Town Centre's vitality and viability, consultees were supportive of options including public realm enhancements, encouraging a greater mix of units in the centre (including residential) and redevelopment at key locations within the High Street to provide marker buildings with a mix of uses. The most popular options however, were to support a greater mix of uses including cafes, bars and other evening economy uses and to make Lewisham a safer place.
- A large majority of consultation respondents also expressed a preference to develop a new role for the southern part of the shopping centre to complement the prime retail.

LEE HIGH ROAD

- Consultees agreed on the principle of the area being designated an opportunity area, however no preferred options emerged with respect to site specific details.
- With respect to Issue LTC 5, consultees supported the option to allocate new sites for retail development with regard to the retail capacity study to help the town centre move toward the floorspace required to achieve Metropolitan Status.

LOAMPIT VALE

- Consultees agreed with the principle of the designation of Loampit Vale as an opportunity area; however no clear preferred option emerged from the consultation process. With respect to the issue of how Lewisham town centre can best move towards Metropolitan Centre status, the majority of respondents favoured the option of allocating new sites for retail development based on the retail capacity study. This study identified retail capacity in Loampit Vale area, particularly on the north side of Loampit Vale.

CONINGTON ROAD

- The consultation response was minimal with no single option favoured over any of the others. Tesco responded stating that they remain committed to enhancing their retail offer in Lewisham and are focusing on opportunities to develop their existing store off Lewisham Road. Tesco aim to regenerate the site through the delivery of a larger, improved store. Tesco have indicated that, given the design challenges facing the area, a design competition may provide the greatest scope for an imaginative and high quality produce. Residential development and where appropriate, complementary leisure uses will form a key part of any redevelopment. Tesco support the Council's vision for comprehensive regeneration of the Conington Road area.

ENGATE STREET

- Consultees agreed on the principle of the area being designated an opportunity area, however no preferred options emerged with respect to site specific

ISSUES RAISED

details.

- Consultations with respect to the approach that should be taken for existing established industrial areas and business uses, most of the respondents favoured retention of existing employment uses and continuation of identifying Lewisham as the most appropriate location for new office development, however equally favoured the conversion of town centre accommodation to residential use. The GLA stated that existing employment uses should be protected, unless a need based study shows that they are surplus to demand.

PREFERRED OPTIONS CONSULTATION (2007)

The following points highlight the principal feedback on the preferred options consultation which took place in 2007. A detail schedule of responses will be included as an annex to the Further Options Report in 2011.

- A number of comments on the scope of the AAP in relation to overlap with other documents in the LDF including the Core Strategy. For example, there is no specific policy position on affordable housing within the LTC AAP. In addition, the approach to developer contributions is set out in the Planning Obligations SPD.
- 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 relaxed approach to employment land and Metropolitan Open Land.
- Opportunities for decentralised energy networks and de-centralised power etc 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 Lewisham Centre.
- Update references to Lewisham Gateway scheme which now has consent.
- The approach to developer contributions in Lewisham is set out in the Planning Obligations SPD. Specific requirements on a site by site basis will be set out in the AAP.
- Strengthen the approach to the evening economy.
- A number of specific and detailed objections or statements of aspiration to the Lewisham Gateway scheme.

APPENDIX 5: Sustainability Objectives, targets and monitoring

The following table sets out the objectives corresponding indicators, targets and sources and monitoring. Results, trends and targets are included where available.

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Social							
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property prices (£)	Lewisham 2010 findaproperty.com Flats/ Maisonettes £169,917 Terraced £226,461 Semi-Detached £313,429 Detached £448,946	London 2010 (South East in brackets) Flats/Maisonettes £356,752 (£163,198) Terraced £482,520 (£204,975) Semi-Detached £545,439 (£247,868) Detached £867,820 (£430,551)		Annual monitoring report Homelessness strategy
			Number of people applying for statutory homelessness				
			Number of households in temporary accommodation				
			Number of housing completions	2008/09: 956	2001/02: 470 2002/03: 722 2003/04: 778 2004/05: 503 2005/06: 967 2006/07: 347 2007/08: 978	975 housing completions annually	
			Number of affordable housing completions	2008/09: 376	2005/06: 246 2006/07: 269 2007/08: 273 & 91 habitable rooms (off site)	429 affordable housing completions annually	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc 2	Decent homes	To increase the provision of housing that meets decent homes standards	Housing completed to Lifetime homes standard	2008/09: Lifetime Home standard: 157 dwellings granted	2007/08: Lifetime Home Standard: 1,182 dwellings granted	All homes built to Lifetime Homes targets	Annual monitoring report
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers	% of residents surveyed expressing satisfaction with the levels of recreational access to the river. Length of riverside improved as part of new development				A natural renaissance for Lewisham , Lewisham Biodiversity Action Plan
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities	% of residents surveyed satisfied with the community facilities provision Delivery of identified social infrastructure Funding secured through S106				Environment Agency Annual monitoring report
Soc5	Heritage Environment	To protect and enhance heritage assets and their settings and utilise the historic environment in the creation of sustainable places	Levels of investment in retaining and maintaining listed buildings Condition of listed buildings in the local area No of buildings on/added/removed from the English Heritage at risk register			Maximise contributions Annual review of whether additional heritage assets should be listed	Annual monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc6	Culture	To protect and enhance cultural diversity	Up to date conservation area appraisals and management plans for CA's within the AAP area				Lewisham Local Cultural Strategy Creative Lewisham - Lewisham Cultural and Urban Development Commission
Soc7	Crime	To reduce crime levels in the town centre	Violent crimes per 1,000 population	2007/08: 41.1	2005/06: 34.3 2006/07: 44.9 Best Quartile 2006/07 England: 13.1 London: 21.95	2006/07: 41.8 2007/08: 22.9	ONS/ Metropolitan Police Service
Soc8	Education	To increase access to lifelong learning	People aged 16-74 with no qualifications Percentage of pupils achieving 5 or more GCSEs at grades A* -C or equivalent Number of learners completing adult basic skills programme	2008: 16,800 (9.5%) London: 12.0% GB:12.4% 2007/08: 54.8%	2007 Lewisham: 17,000 (9.7%) London: 12.8% GB: 13.1% 2005/06: 49% 2006/07: 54.8% 2006/07 England: 61.8% London: 63.23% 2003/04: 1,480 2004/05: 1,550	Year on year decrease Year on year increase	NOMIS Official Labour Market Statistics Census KS13 NI
				2005/06: 1,600		2009/10: 1,700	NI

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.	Funding secured through S106 Gain and losses of community and recreational facilities completed Delivery of identified social infrastructure			Maximise contributions No net loss Delivery in accordance with IDP	Annual monitoring report
			Number of visits to libraries	2005/06: 6,222	2004/05: 6,018	2009/10: 7,780	LAA, NI 9
Soc10	Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population serious or fatal				BVPI London Borough of Lewisham
Soc11	Health	To improve inclusive access to local healthcare facilities	Mortality rate from circulatory diseases under age 75 Mortality rate from all cancers at age 75 or under Health life expectancy at age 65	102.94 124.25 2001 11.2 (M) 13.5 (F)		2010/11: 70 2010/11: 107 2010/11: 13.8 (m) 15.8 (f)	LAA, NI 121 LAA, NI 122 LAA, NI 137, NHS Lewisham

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc12	Noise	To reduce noise from road traffic, construction and industry	Noise complaints	2001/02: 8,147 noise complaints	2000/01: 7006	Reduction in noise complaints	LB Lewisham
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces	Number of applications granted or refused on designated open space	2008-09: 0	2007-08: 0	Minimise loss of open space and maximise gains	Annual monitoring report
			Number of applications within SINC's granted or refused planning permission	2008-09: 0	2007-08: 0		
			Amount of new open space provided as part of a new development	This is a new indicator and data will be collected from 2010/11			
Environmental							
Env 1	Effects of climate change	To ensure Lewisham town centre is resilient to climate change using mitigation and adaptation measures through sustainable design and construction	Number of homes achieving Code for Sustainable Homes level 4 or above granted and completed Carbon footprint of Lewisham	This is a new indicator and data will be collected from the 2010/11 AMR 2008 11.84 tonnes CO2 per capita	This is a new indicator and data will be collected from the 2010/11 AMR Lewisham ranked 20 th out of 33 London Boroughs	All housing built to CSH Level 4 Year on year improvement	Annual Monitoring report Environment Agency and Stockholm Environment Institute
Env2	Flood Risk	To reduce the risk and effects of flooding	Number of permissions granted contrary to the advice of the Environment Agency	2008/09: 0	2005/06: 0 2006/07: 0 2007/08: 0	0	Annual Monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
			Number of permissions granted contrary to the advice of the statutory water/sewerage undertaker on low pressure / flooding grounds Number of properties signed up to Environment Agency Flood Warning Direct and Extended Direct Warning services	TBC	TBC	0	Annual Monitoring Report
		No and size of Living Roofs granted and completed		2008-09 Granted: 6 Completed: no data	TBC	Year on year improvement	Environment Agency
Env3	Sustainable transport	To reduce dependency on private cars	PTAL score of new development No. of car clubs	High PTAL for Catford, Lewisham and parts of Deptford 2009/10: 8 section 106 agreements secured the provision of a 'car club'		Increase in the number of completed living walls and roofs Higher density development to be located within areas with a higher PTAL Year on year increase	Annual Monitoring report TfL Annual Monitoring Report
		Proportion of journeys made on foot and cycle		2001: 2% (home to work trips)		To increase existing walking and cycle trips by 10% in 2012	Annual Monitoring Report
		No of new cycle facilities		This is a new indicator and data will be collected from 2010/11		All permitted development to include cycle facilities	Annual Monitoring Report
Env4	Renewable energy	To increase on-site renewable energy provision	No. and capacity of renewable energy granted and completed by type	2008/09 Completed: 4 Granted: 17 Photovoltaic Panel: 3	2007/08: No. of permission: 19 Photovoltaic Panel: 3	Maximise renewable energy by type	Annual Monitoring Report Core E3

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Env5	Energy efficiency	To increase the energy efficiency performance of existing buildings	BREEAM, Code for Sustainable Homes for other buildings	Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13	Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13 Other renewable energy measures: 9	BREEAM Excellent CSH 4	Annual Monitoring report
Env6	Waste and recycling	To increase the amount of waste recycling	Per capita reductions in CO2 Percentage of waste recycled, reused or composted Percentage of municipal waste sent to landfill Residual household waste per year	BREEAM 2008-09 Excellent Standard: 1 CSH – new indicator 2008/09: 0 2009/10: 16.8%	2005/06: 0 2006/07: 0 2007/08: 0 2008/09: 20.55%	2011: 4,575 tonnes 25% waste recycled by 2012 Year on year reduction	LAA, NI 186 Defra LB Lewisham Strategic Waste and Management, LBL Strategic Waste and Management, LBL
Env7	Water quality and use	To provide sustainable sources	Promote grey water re-use and sustainable water use in	2009/10: 10.9% 2009/10: 777kg	2008/09: 3.72% 2007/08: 4.84% 2006/07: 9.47% 2005/06: 10.04% 2004/05: 10.46% 2003/04: 11.79% 2008/09: 767.75kg	2009/10: 754kg 2010/11: 716kg	LAA, NI 191 Strategic Waste and Management LBL Annual monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
			new development				
		of water	Water quality assessment				Environment Agency
Env8	Air quality	To improve air quality	Levels Exceeding Main Air Pollutant Quality Standards Level of NO2 and PM10			As per AQMA standards	Annual monitoring report London Air Quality archive
Env9	Nature conservation	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies	Changes in population of selected species Change in biological and chemical river quality Length of river restored/naturalised Changes in biodiversity	A and B (Good or better) Thames Region: 2008: 3.8% 2008: 200m Ladywell Fields 2008/09 No Change		Biodiversity Plan targets No decrease in quality Length restored	Annual monitoring report Annual monitoring report
					2007/08 Lowland beech and yew woodland: 0.00 ha Wet Woodland: 0.09 ha Lowland mixed deciduous woodland: 38.46ha Traditional orchards: 0.69 ha Wood-pasture and parkland: no data available Hedgerows: 0.42ha Lowland meadows: 1.40 ha Lowland calcareous	Maintain and enhance the current population of biodiversity importance	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Env10	Maintain and enhance townscapes and landscapes	To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape	New and converted buildings on previously developed land	2008/09: 99% (1,097 dwellings out of 1,108 dwellings)	grassland: 0.00ha Lowland dry acid grassland: 40.66ha Reedbeds: 0.00ha Coastal saltmarsh: 0.03ha Intertidal mudflats: 2.55ha Rivers: 19.39ha Eutrophic standard waters Ponds: 1.96ha Open mosaic habitats on previously developed land 2007/08: 96.58% (1,045 out of 1,082)	To exceed 90% of dwellings provided on previously developed land	Annual Monitoring Report
			No. of schemes including contaminated land remediation granted or completed				
			Amount of SINC land			No decrease in SINC land	
Economic							
Eco1	Retail offer	To increase the diversity of the retail offer	Amount of completed retail floorspace Number of different retail functions and types accommodated in the area	2008/09 Gross B1(a): 508 m2 A1: 2,940 m2 A2: 269 m2 A3: 716 m2 A4: 0 m2 A5: 243 m2 D2: 803 m2	2005/06: Gross: B1(a): 1,223 m2 A1: 1,189 m2 A2: 967m2 A3: 539 m2 A4: 0 m2 A5: 224 m2 D2: 77 m2	40,000 sq. m by 2026	Annual Monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
				<p>Net</p> <p>B1(a): 458 m2 A1: 1,263 m2 A2: 189 m2 A3: 180 m2 A4: -1,265 m2 A5: 243 m2 D2: 61 m2</p>	<p>Net</p> <p>B1(a): no data A1: -65 m2 A2: 810 m2 A3: -171 m2 A4: -870 m2 A5: 224 m2 D2: 77 m2</p> <p>2006/07: Gross B1(a): 3,892 m2 A1: 635 m2 A2: 169 m2 A3: no data A4: no data A5: no data D2: 1,000 m2</p> <p>Net</p> <p>B1(a): 3,102 m2 A1: 236 m2 A2: -390 m2 A3: -171 m2 A4: no data A5: 381 m2 D2: 885 m2</p> <p>2007/08 Gross B1(a): 665 m2 A1: 2,163 m2 A2: 500 m2 A3: 633 m2 A4: 340 m2 A5: 381 m2 D2: 7,103 m2</p> <p>Net</p>		

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy	Evening economy – available floorspace Amount of completed leisure and A3 floorspace	See above	B1(a): 459 m2 A1: 265 m2 A2: -165 m2 A3: -623 m2 A4: -70 m2 A5: 381 m2 D2: 5,218 m2 See above	Increase in Lewisham Town centre	Annual Monitoring Report
Eco3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment	Percentage of town centre mixed use schemes Proportion of office and retail vacancy rates	2010 - 6,500 sqm retail vacancy (8%)	2010 average vacancy (national) = 11.5%	Increase year on year Decrease year on year	Annual Monitoring Report
Eco4	Local business	To increase density of local business	New business registration rate Percentage of small businesses in an area showing employment growth Amount of completed office floorspace	2007: 5,390 Registration: 850 Deregistration: 450 2006/07 10.6% 2008/09 Gross B1: 1,775 m2 Net B1: -114 m2 See specific figures for A2,	2004: 4,595 2006: 5,065 2005/06: Gross: B1: 1,223 m2 2006/07: Gross: B1: 3,892 m2 2007/08	Year on year increase 2009/10: 9.5% 2010/11: 9.5% No net loss	Companies House LAA, NI 172 Annual Monitoring Report - Core BD1

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
				B1(a) above	Gross B1: 1,209 m2 Net B1: -5,127 m2		
			Job density	2008 Density: 0.43 (77,000 jobs)	2008 London: 0.94 GB: 0.83	No reduction	ONS/NOMIS
Eco5	Employment opportunities	To increase access to local employment and reduce local unemployment	Employee jobs in Lewisham town centre	2008 Full-time: 62.2% (38,000) Part-time: 37.8% (23,100)	2008 London Full-time: 73.9% Part-time: 26.1% GB Full-time: 68.8% Part-time: 31.2%	Increase in employment rate	ONS/NOMIS
			% of population of working age who claim unemployment benefit	10/2008- 9/2009 Economically Active: 145,400 (77.9%) Unemployed: 12,700 (8.7%)	10/2008- 9/2009 Economically Active London: 75.8% GB: 78.9% Unemployed: London: 8.4% GB: 7.4%	Decrease unemployment	ONS/NOMIS
			Number of years unemployed by age			Reduce number of years unemployed across all age bands	ONS/NOMIS

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Planning Policy 020 8314 7400

planning.policy@lewisham.gov.uk

MAYOR AND CABINET		
Report Title	Bereavement Services – Proposed Increase In Cemeteries and Crematorium Fees and Charges	
Key Decision	Yes	Item No. 7
Ward	All	
Contributors	Executive Director for Customer Services	
Class	Part 1	Date: 19 January 2011

1. Summary & Purpose

- 1.1 The purpose of this report is to seek Mayor and Cabinet’s approval to increases in the current fees and charges for Lewisham Cemeteries and Hither Green Crematorium which are proposed as follows:
- Cemeteries fees and charges by 10%;
 - The introduction of a fee of £25 for levelling a grave;
 - Crematorium memorial fees by an increase of 2.5%; and
 - To increase Cremation fees by £60 to £535

2. Policy Context

- 2.1 A priority of the Community Strategy is to improve the effectiveness, efficiency and sustainability of local public services. This is underpinned by the Council’s commitment to deliver Value for Money services. The fees and charges levied in Lewisham are slightly higher than the London average for cemeteries though the crematorium fees are comparable with services across South East London for crematorium services (Appendix A).

3. Recommendations

The Mayor is recommended to agree:

- 3.1 An increase of £60 to the current Cremation fee;
- 3.2 An increase of 2.5% for crematorium memorials,
- 3.3 An increase of 10% for all cemetery fees and charges;
- 3.4 The introduction of a fee of £25 for the levelling of a grave;

All to take effect from Monday 28 February 2011.

4. Background

- 4.1 Cemeteries and Crematorium fees and charges were last increased in January 2010. At that time it was agreed to increase cemeteries fees and charges and crematorium memorial fees by inflation only at 2.5%, and to increase the fees for a cremation service

by £50 to enable us to maintain the level of service and to meet agreed cuts to the annual budget.

- 4.2 A comparison of the cemeteries and crematorium fees currently charged by other surrounding Local Authority and Private providers' shows fees across the area vary considerably (please see Appendix A).
- 4.3 The proposed increase of £60 for Crematorium fees should not affect the level of demand for services held at Hither Green Crematorium, however, other Local Authority Crematoria increase their fees in April, so it is difficult to anticipate what they might be increased to. Currently, those LA Crematoria local to us charge £446 (Southwark) and £530 (Eltham, including organist) and the local private Crematorium charges £670 (Beckenham, fee increased in October, includes organist). The proposed increase will enable us to meet agreed cuts to the annual budget and any inflationary increase and will reflect the cost of providing the service. However, it should be noted that Eltham and Beckenham Crematorium have already included an environmental surcharge in their crematorium fees and Lewisham has not yet made a decision on Mercury Abatement and what the environmental surcharge should be.
- 4.4 Hither Green Cemetery has limited available burial space. Unused spaces are still available between graves but we urgently need to convert areas in the cemetery for burial use. Grove Park Cemetery has more available space but new areas are required. Both cemeteries have areas within them that can be converted for burial use. However, the cost of converting these areas is quite substantial (approximately £100,000) The 10% increase is therefore proposed to cover the cost of inflation and to provide additional funds to convert the available land for burial.
- 4.5 Currently there is no set fee for a stonemason to level a grave. However, when stonemason come into the cemetery there is a small element of damage to roads and paths caused by heavy lorries and it is therefore appropriate to charge a small fee. As there is no fee within the structure the only fee that could be charged at present is that for an additional inscription, which is currently £61, which is rather expensive for the work to be undertaken. It is therefore proposed to introduce a fee of £25 for this work. The introduction of this fee will generate very little income as most stonemasons carry out levelling when undertaking other works and is solely for the purpose of having a fee within the fee structure.
- 4.6 The fees and charges levied in the Cemeteries and Crematorium reflect the cost of providing the service, but do not cover Central recharges.

5. Legal Implications

- 5.1 The Council as a Local Authority, by virtue of section 214 of the Local Government Act 1972 is a burial authority.
- 5.2 Further, by virtue of the provisions of the Local Authorities' Cemeteries Order 1977, the functions with respect to cremation were added to the functions of burial authorities.
- 5.3 Paragraph 15 of the said 1977 Order provides burial authorities with the power to charge such fees as they think are proper – "(a) for or in connection with burials in a cemetery;

(b) for any grant of a right to place and maintain a tombstone or other memorial in a cemetery... (c) for any grant of a right to put an additional inscription on such a tombstone or other memorial”.

- 5.4 By section 9 of the Cremation Act 1902 a burial authority may demand payment of charges or fees for the burning of human remains in any crematorium provided by them. It is further provided that such charges or fees, and any other expenses properly incurred in or in connection with the cremation of a deceased person, shall be deemed to be part of the funeral expenses of the deceased.
- 5.5 In accordance with the provisions of the said paragraph, a burial authority is obliged to keep a table showing the matters in respect of which fees or other charges are payable to them, and the amount of each such fee or charge, and the table shall be available for inspection by the public at all reasonable times.

6. Financial Implications

- 6.1 Bereavement Services total income budget for 2010/11 is £1.8m. In a full year, the proposed increases in fees could achieve:

Cremations (£60 increase)	£ 90,000
10% increase in Cemeteries fees and charges	<u>£ 91,600</u>
Total	<u>£ 181,600</u>

- 6.2 The proposed increases in fees and charges would generate approximately £181,600 income in a full financial year and represents an increase of approximately 10%. £11 of the increase in Cremation fees forms a part of the 2011/14 budget strategy considered by Mayor and Cabinet on 17 November 2010.
- 6.3 The increases proposed could have an impact on the number of services requested at Hither Green Crematorium as the fees could be more than nearby Local Authority Crematoria, only one other LA Crematoria fees could be lower than Lewisham's but as they do not increase their fees in until April it is difficult to establish at this stage whether our fees will remain above/below or at the same level as their fees.

7. Equalities Implications

- 7.1 The fees and charges for this service are set with due regard to the Council's Equal Opportunities Policy. Increasing fees and charges will disproportionately affect lower income groups, but as previously stated the costs are comparable with other London Local Authorities. The Department of Works and Pensions do provide financial assistance to clients eligible for support to the full value of a burial in a lawn section grave or cremation, plus £700 towards fees charged by funeral directors.

8. Environmental Implications

- 8.1 There are no specific Environmental Implications attached to this report.

9. Crime and Disorder Implications

9.1 There are no specific crime and disorder implications attached to this report.

10. Conclusions

10.1 Agreement to the proposed increase in Cemeteries and Cremation fees would be higher than the cost of inflation, but are necessary to meet budget pressures and to enable the current level of service provision to continue.

10.2 Agreement to the proposed increases in Memorial fees would be in line with inflation.

11. Background Papers and report originator

11.1 There are no background papers to this report.

11.2 If you would like more information about this report, please contact Shirley Bishop, Head of Bereavement Services, telephone no. 020 8314 9640.

APPENDIX A - COST COMPARISON WITH LOCAL BOROUGHES, NOVEMBER 2010

LEWISHAM	LEWISHAM	ELTHAM	SOUTHWARK	BECKENHAM	CROYDON
PROPOSED FEE	CURRENT FEE	CURRENT FEE	CURRENT FEE	CURRENT FEE	CURRENT FEE
From Jan 2011	From Jan 2010	From April 2010	From April 2010	From October 2010	From April 2010
535	£475	£530	£446	£670	£576
435	£375	£510	£446	£670	£467 no service or enviromentally friendly coffin
803	£713	N/A	£667	988	£718
1,070	£950	N/A	N/A	£1,305	N/A
NO CHARGE	NO CHARGE	N/C UP TO 5YRS	N/C UP TO 15 YRS	NO CHARGE	no charge up to 10 yrs
NO CHARGE	NO CHARGE	£35 6-17YRS	OVER 15 YRS £446	NO CHARGE	over 10yrs ADULT FEE
£60	£60	INCLUSIVE	£52	INCLUSIVE	INCLUSIVE
		GREENWICH		BROMLEY	
		CURRENT FEE		CURRENT FEE	
		From April 2008		From April 2010	
£1132 - 1759	£1028 - 1599	1135 - 1650	£691 - 927	£1,523	£1358 - 2927
£700	£621	£528	£541	£357	£886
£77	£72	£65	INCLUSIVE	£121	£171 INCL ORGAN
£1,190	£1,082	£638 - 830	£745.50-871.50	£1715 - 1981	£886 - 1173
£77 per ft	£70 per ft	£230 - £286	£83 per ft	£268 - 808	£274
£174	£158	£143	£144	£470	£172
£240	£219	£50 - 180	£167	£146 - 339	£105 - 253
£2,362	£2,147	Costs incurred	£4,608	£242 officer	Individual quote given
£735	£668	digging to coffin,		time/admin	
		plus contractors		plus contractors	
		charges		charges	
	INCL. IN BURIAL FEE	£65	INCL. IN BURIAL FEE	INCL. IN BURIAL FEE	£91

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Mayor and Cabinet			
Report Title	Establishment of strategic Race Equality Organisation in Lewisham		
Key Decision	Yes	Item No.	8
Ward	All Wards		
Contributors	Executive Director for Community Services, Executive Director for Resources, Head of Law		
Class	Part 1	Date:	19 January 2011

1. Summary

- 1.1 This report describes issues arising from a review of organisational arrangements in the Borough to tackle race equality and race relations. It sets out proposals to meet identified unmet needs within the Council's overall equality strategy, to fill the gap left by the demise of the Race Equality Action in Lewisham (REAL) organisation and to assist the Council in meeting its overall statutory requirements in line with equality and human rights legislation. Outlining three options for a way forward, it recommends the establishment of a new organisation, and how to carry this forward.

2. Purpose of report

The purpose of the report is to outline the conclusions of a review undertaken by Lord Herman Ouseley on the organisational arrangements in the Borough to tackle race equality and race relations, and to seek approval for proposals to establish a new organisation.

3. Policy Context

- 3.1 The Equality Act 2010 will replace the existing anti-discrimination laws with a single Act and includes a new public sector equality duty replacing the separate public sector equality duties relating to race, disability and gender, and covering age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment more fully. The equality duty consists of a general duty, which states that public bodies must have due regards to the need to:

- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality of opportunity between different groups; and
- Foster good relations between different groups.

- 3.2 The Council supports a range of initiatives and organisations that support the delivery of the equality duty and Lewisham's priorities in the area of

Equalities and Human Rights. This includes both directly delivered programmes such as the Young Mayor's scheme as well as grant aided organisations such as Lewisham Disability Coalition, Lewisham Ethnic Minority Partnership and faith-based organisations. The Council also works with the sector to ensure that the diversity of organisations are tackling potential areas of discrimination.

- 3.3 Section 2 of the Local Government Act 2000 enables the Council to do anything, which it considers, is likely:
- to promote or improve the economic well being of its area or
 - to promote or improve the social well-being of its area or
 - to promote or improve the environmental well-being of its area.
- 3.4 In exercising its powers under Section 2, the Council must have regard to Lewisham's Sustainable Community Strategy. The Council gives grant aid to a number of organisations in pursuit of the objectives of the Sustainable Community Strategy and in particular organisations that promote equality.
- 3.5 Some voluntary and community sector organisations make a direct contribution to the Council's priorities through specific service provision whilst others contribute more indirectly through providing network support to clusters of specialist organisations or through contributions to strategic planning and development together with playing a key role in strategic partnerships. The Council recognises that the grant aid programme assists in ensuring that the voluntary and community sector has a voice and can represent independent interests as well as in ensuring effective service delivery to residents.

4. Recommendations

It is recommended that the Mayor and Cabinet:

- 4.1 notes the review undertaken by Lord Ouseley (Appendix A)
- 4.2 agrees to the establishment of a new organisation as set out in paragraphs 7.3 – 7.5 and paragraph 8.

5. Background

- 5.1 Race Equality Action for Lewisham (REAL) was established in 2003 to provide a strategic race equality organisation for the borough, working with statutory, voluntary and community sectors to ensure race equality is incorporated into local agendas. The organisation also existed to tackle all forms of racial injustice and discrimination, providing advice and support to victims of racial discrimination. The organisation was in receipt of funding from the Council's main grants programme (£154,277 for 2008/09) to undertake this strategic race equality role, with additional funding from the Equalities and Human Rights Commission (EHRC).

During 2009 REAL collapsed due to a number of serious organisational problems, and the Council ceased to fund them from October 2009.

- 5.2 With the demise of REAL, the Council engaged Lord Herman Ouseley to undertake a review on how best the Council could meet its race equality commitments within the context of its overall statutory equality obligations as a public service authority, especially in promoting good race relations, equality of opportunity and tackling unlawful discrimination, whilst recognising the need to respond to the wider equality needs of the Borough's population.

6 Race Equality Review

- 6.1 The Review comprised a process of dialogue with representatives of local organisations and individuals previously and currently involved in race related work to some extent in the Borough. Focus group meetings and sessions for individuals were held to clarify issues of relevance, to draw on their appropriate experiences and to guide and shape the matters of substance for the Review. Ethnic, economic and social needs data was reviewed and is commented on in the report, where appropriate. In addition, consideration was given to operational models elsewhere for such activities in order to assess their appropriateness for application to Lewisham.
- 6.2 The Review took the demise of REAL as its starting point and sought to determine how any unmet needs arising from continuing racial disadvantage may be best tackled through local voluntary, community-led initiatives within the overall context of general public services provision as well as those meeting special and particular needs.
- 6.3 Several issues were identified by BAME and other community consultees as priorities for action in filling the gaps left by REAL, requiring urgent consideration and responses and necessary to be included in the remit of any newly created organisation. Issues identified included the need for assistance for individuals facing discrimination. The EHRC do undertake some casework, however they only take on cases that potentially have national impact. Local advice agencies also provide some assistance around discrimination, particularly employment and housing, however consultees felt that the level of support does not adequately meet local need. Other equalities areas such as disability and older people are in receipt of funding from the Council specifically for advice work, with young people's advice being supported from London Councils.
- 6.4 Another key issue identified by the review is the need to improve engagement and involvement in local agencies including the voluntary and community sector. Specific needs identified were work with vulnerable young people, education and training, mental health (with a disproportionate number of BME people within the mental health system), unemployment and a perception that there is an increase in prejudice, giving rise to the need for areas of promotional work in borough organisations.

7. Options

- 7.1 Three options have been put forward by Lord Ouseley. The first option is to do nothing other than absorb REAL's functions and responsibilities into the Council's own provision. This option is not recommended as it would seriously impede the Council in delivering its equality duty with regard to the race equality aspect.
- 7.2 A second option would be to follow the model of the EHRC establishing one equality organisation to take a broad-brush approach to equalities, for the whole Borough. Lord Ouseley's report does not consider that this is the best way forward. There is little evidence about how well this model might work and Lord Ouseley, in presenting the report questioned how feasible it might be to bring all equalities areas together without losing focus on specific equality areas, which might be to the detriment of work around equality of opportunity. Existing equalities organisations locally felt that this would be difficult to achieve in the short term and there would need to be a more gradual approach to achieve the emergence of such a unified body to tackle all forms of inequalities.
- 7.3 The third option put forward in the report is to have a single focused race equality body, with due regard to all equality areas. This would be achieved by having a co-ordinated approach through a consortium with all other voluntary organisations and especially those providing equality and advocacy support services for other disadvantaged groups of people on grounds of sex, disability, age, sexuality, religion and belief. This is the favoured option of local consultees and the one recommended by Lord Ouseley.
- 7.4 In exploring the three options, officers recommend the third option. It will assist with the Council's Equality Duty (see paragraph 3.1), ensuring that all equality areas are supported appropriately. In establishing the new organisation there are a number of principles that should be adhered to. These are:
1. The governance needs to be credible, transparent and independent. In explaining this principle Lord Ouseley outlined that there needs to be different leadership, both in terms of staff and management committee, from that of REAL or other previous Race Equality organisations. Feedback from those consulted identified that there were concerns that a new organisation would not be in a position to operate effectively if those involved previously in the local race equality organisations were leading the new consortium. To this end, those people involved with the governance or management of REAL should not be leading on the new organisation.
 2. The new organisation needs to be in an accessible location, where people know where they can go and what is on offer
 3. The organisation needs to be inclusive, including people from all backgrounds

4. Independent scrutiny by non-executive scrutiny (independent members not involved with the organisation)
 5. Maximisation of income - the organisation needs to ensure that it is funded from a range of sources.
- 7.5 Officers have explored the feasibility of establishing an organisation across boroughs. Discussions with Southwark and Lambeth have shown that the approach to race equality is different and therefore not feasible at this time. Lambeth do not have a race equality organisation, with discrimination cases being undertaken by local advice agencies. Any strategic work is undertaken internal to the Council by an Equalities Team who provide the corporate strategic framework and aim to embed the approach corporately. Southwark have a number of community of interest fora that feed into the Council and partnership consultative bodies. They also fund the advice sector to undertake discrimination cases. They are therefore currently going out to tender for an existing local organisation to act as 'critical friend' on race equality as that is what they consider is needed in Southwark.

8. Establishment of a new Race Equality organisation and consortium

- 8.1 If Option 3 is agreed a clear specification of the services that need to be provided will be drawn up along with the aims and objectives of the consortium and further development of the consortium model, taking on board the principles as set out in paragraph 7.4.
- 8.2 The consultation carried out by Lord Ouseley identified a number of issues that need addressing. The main issues identified were the need for advocacy, discrimination casework, and social policy particularly around employment, housing, education and training and the criminal justice system. Also identified was the need to build the capacity and local engagement of the BME community. The need for advocacy casework in the area of discrimination is one that has also been identified through the needs analysis undertaken as part of the Framework for funding Information and Advice Services in the borough. The discrimination cases supported by REAL were recognised as part of the pattern of provision locally and is currently a gap that needs to be filled. This is particularly important in the areas of employment and training given the current financial climate. The new organisation would be expected to work collaboratively with the other advice providers in the borough to ensure effectiveness and spread of provision.
- 8.3 The Consortium would need to :-
 - a) provide a focal point for voluntary and community-led responses to race equality and race relations in the Borough and to secure positive collaboration in the design of more coherent, cost effective and easily accessible and efficient arrangements for tackling all inequalities affecting the borough's diverse population.

- b) engage with and involve those individuals and particular groups of people experiencing discrimination, disadvantage and exclusion in activities designed to secure their participation in civic facilities/ functions/events and to have their voices heard by all statutory agencies, public service providers and local employers.
 - c) liaise with and provide appropriate support to the Council and all other public service providers in the borough in the fulfilment of their statutory responsibilities with regard to equalities.
 - d) secure financial resources to cover operational costs and to widen the base of funding to achieve sustainability and maintain independence.
- 8.4 In establishing the new consortium, all local third sector organisations will be invited to become members and would elect six members of the consortium to sit on the non executive board of the organisation. There would also be a panel of individual members, who support the aims and objectives of the Consortium, they would be made up of individual committed people and especially local business people. They would elect two members from their panel to serve as members of the Board. The purpose of the independent panel members would be to act as a balance to the voluntary sector representatives. In addition the board would appoint a suitably qualified independent non-executive individual from outside the ranks of its membership with the specific responsibility for scrutiny and audit of staff performance, maintenance of professional standards of conduct and effective accountability including that of governance (See Figure 1 below)
- 8.5 A small working group, chaired by Lord Ouseley will be set up to oversee the move towards the establishment of the Consortium. Membership of the working group will be drawn from a range of organisations involved in the different strands of equality to ensure breadth, as well as some representation from umbrella organisations. The composition of the working group will initially be drawn up by Lord Ouseley in consultation with the Mayor. The work of the working group will be resourced by the Council, with the progress regularly reported to the Council. A timescale for the establishment of the Consortium will be drawn up, with milestones to demonstrate the progress of the working group. The work programme and areas of work of the consortium to be supported by the Council will be negotiated and agreed prior to any funding being agreed, although advocacy as identified in 8.2 is considered key.
- 8.6 If this option is agreed, the funding that has been ring fenced for a new organisation should be utilised for this purpose. Prior to the organisations being set up, a report will be submitted to Mayor and Cabinet (Contracts) outlining the structure, work areas and budget for the organisation for approval.

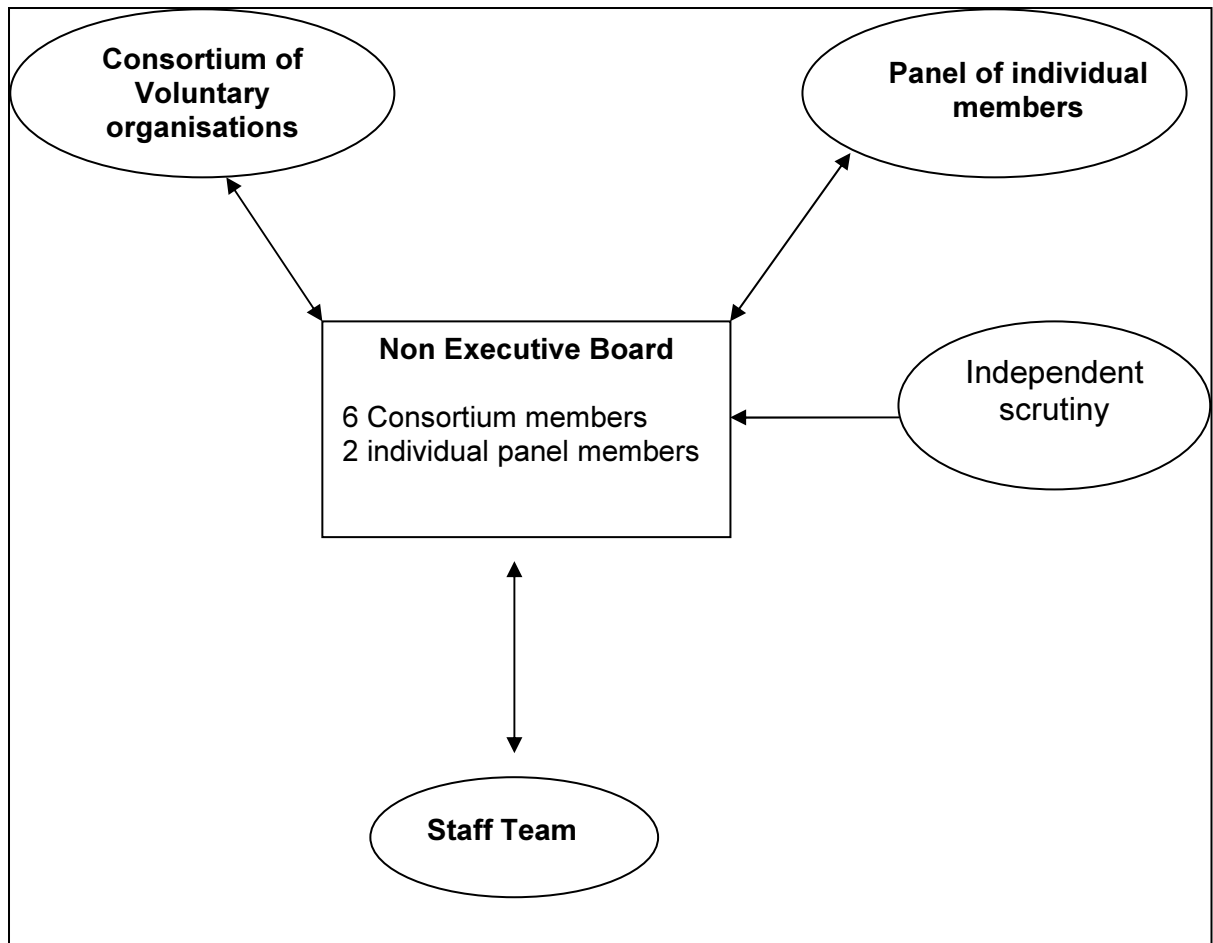


Figure 1. Proposed structure of a new race equality organisation

9. Financial Implications

- 9.1 The current ring fenced grant budget for equalities in Lewisham is £160,220, as approved by Mayor & Cabinet (Contracts) on 20th January 2010.
- 9.2 Costs to date in 2010/11 for the winding up of REAL and payments for Lord Ouseley's review have been £17,758 (£3,900 Review, £13,858 winding up).
- 9.3 Paragraph 8 of the report describes the process for setting up the new organisation, and the costs for this will be contained within the balance of budget available.
- 9.4 Grants to the new organisation from 2011/12 onwards will be assessed and approved in the same way as any other grants from the main programme.
- 9.5 If the brief for moving this work forward does have to go out to tender, this will be done in accordance with the relevant Financial Regulations & Procedures.

10. Legal Implications

- 10.1 Section 2 of the Local Government Act 2000 enables the Council to do anything, which it considers is likely to promote or improve the economic, social or environmental well-being of its area. This allows the Council to establish and provide funding for a Race Equality Organisation.
- 10.2 The Organisation must have regard to the Council's Equality and Diversity Policy and the Race Relations Act 1976 (as amended by the Race Relations (Amendment) Act 2000). The Organisation must also have regard to the Sex Discrimination Act 1975 and the Disability Discrimination Act 1995 (as amended).
- 10.3 The Equality Act 2010 came on to the statute books this year but many of its provisions await commencement. Therefore the Acts referred to in paragraph 10.2 are still in force and have not, as yet, been replaced by the Equality Act 2010.

11 Crime and disorder implications

There is a need for an organisation to fill the gap made since the demise of Race Equality Action Lewisham who worked extensively with the police and crime reduction service to improve community safety within the borough and build positive relations between the police and BME communities.

12. Equalities Implications

- 12.1 The Equality Act 2010 replaced the existing anti-discrimination laws with a single Act and included a new public sector equality duty replacing the separate public sector equality duties relating to race, disability and gender, and covering age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment more fully. The equality duty consists of a general duty, which state that public bodies must have due regards to the need to:
- Eliminate unlawful discrimination, harassment and victimisation;
 - Advance equality of opportunity between different groups; and
 - Foster good relations between different groups.
- 12.2 The Council supports a range of initiatives and organisations that support the delivery of the equality duty and Lewisham's priorities in the area of Equalities and Human Rights. This includes both directly delivered programmes such as the Young Mayor's scheme as well as grant aided organisations such as Lewisham Disability Coalition, Lewisham Ethnic Minority Partnership and faith-based organisations. The Council also works with the sector to ensure that the diversity of organisations are tackling potential areas of discrimination. With the demise of REAL, there has been a gap in independent voice on race

equality in the borough, and by establishing a new organisation, this will assist the Council in meeting its requirements under the Equality Act.

13. Environmental Implications

There are no environmental implications arising from this report.

BACKGROUND PAPERS

None

If you would like more information on this report please contact Sandra Jones, Community Sector Unit, Community Services Directorate on 0208 314 6579

RACE EQUALITY IN LEWISHAM - A REVIEW**Purpose of Review**

This report describes issues arising from a review of organizational arrangements in the Borough to tackle race equality and race relations. It sets out proposals to meet identified unmet needs within the Council's overall equality strategy, to fill the gap left by the recent demise of the Race Equality Action in Lewisham (REAL) organisation and to assist the Council in meeting its overall statutory requirements in line with equality and human rights legislation. The review does not in any way attempt to comment on the Council's own internal arrangements to tackle race inequalities as part of its provision of personal and public services for the Borough's inhabitants.

The Context

1. In the post-war period of the last six decades, Lewisham Council has strived positively, as a public service body, serving the interests of all its inhabitants, to meet the particular and different needs of its increasingly changing diverse population. During that period, various organizational structures were established within the public services to respond to such changing needs, especially those exacerbated by racial disadvantage and the effects of racism and racial discrimination. More significantly for the context of this report, it is crucial to note that the Council has always been careful to prioritise support for community-based and led activities aimed at challenging racial prejudice, discrimination, harassment and exclusion, as well as stressing the necessity of such work connecting with all sections of the Borough's population.
2. A brief chronology of this relevant activity is reflected in the work of the previous Community Relations Council in the 1960s and 1970s, followed by Race Equality Councils in the 1980s and 1990s and, most recently, Race Equality Action in Lewisham (REAL). In 2009, REAL collapsed under the weight of internal management strife as well as pressure to respond

appropriately to the changing nature of race, race equality and diversifying needs and requirements among the Borough's population.

3. With recent legislation to harmonise statutory equality duties, local authorities, other statutory agencies and the third sector have been shaping their responses thereto to meet the government's requirements with regard to community cohesion, single equality structures and initiatives to tackle multiple discrimination and wide ranging inequalities. This is all being shaped within the framework of a squeeze on public finances and diminishing resources to meet diverse needs from other private and charitable sources during the economic downturn. Strategic partnerships have embraced these challenges and the Council has an extensive Equalities Strategy with a Comprehensive Equalities Scheme covering all the statutorily identified characteristics, which are distinguishing features in anti-discrimination and equalities legislation. The Scheme also covers all the non-statutory characteristics which are to be covered by newly enacted Equality legislation.

Within the sphere of community-based and community-led action, the Council provides support for third sector initiatives across the widest range of needs, which include specific race-related projects.

4. This Review has focused on how best the Council could meet its race equality commitments within the context of its overall statutory equality obligations as a public service authority, especially in promoting good race relations, equality of opportunity and tackling unlawful discrimination, whilst recognizing the need to respond to the wider equality needs of all sections of the Borough's population. The primary consideration herein is that of establishing an independently-led third sector organization to undertake community-based activities among and on behalf of disadvantaged communities to assist the Council to reduce racial disadvantages, eliminate unlawful discrimination, promote equality of opportunity and encourage good relations between people from all backgrounds. Any new organization established would have to adopt such fundamental core functions/duties within its constitution to justify its existence.

Process and Methodology applied

5. The Review comprised a process of dialogue with representatives of local organizations and individuals previously and currently involved in race related work to some extent in the Borough. Focus group meetings and sessions for individuals were held to clarify issues of relevance, to draw on their appropriate experiences and to guide and shape the matters of substance for the Review. Ethnic, economic and social needs data was reviewed and is commented on in the report, where appropriate. In addition, consideration was given to operational models elsewhere for such activities in order to assess their appropriateness for application to Lewisham.

The Issues

6. The Council has detailed organizational arrangements in place for its own internal delivery of personal and public services to meet the identified needs of its population and to do so in line with its statutory duties under equality legislation. It supports independent community-led organizations, which provide services for local people to complement and enhance those provided by the Council in meeting social, information, economic and care needs. It is the local community-based and led sector that this Review is concerned with.
7. The Review took the demise of REAL as its starting point and sought to determine how any unmet needs arising from continuing racial disadvantage may be best tackled through local voluntary, community-led initiatives within the overall context of general public services provision as well as those meeting special and particular needs. Several issues were identified by BME and other community consultees as priorities for action in filling the gaps left by REAL, requiring urgent consideration and responses and necessary to be included in the remit of any newly created organization. These are as follows:-

- Advocacy and discrimination case work

- BME representative voices to challenge exclusion and discrimination
- BME visible in community leadership and governance
- Resources for BME-led groups/ exploring shared resources
- Vulnerable young people and families at risk
- Education and training
- Health care and mental health issues
- Unemployment/employment
- Housing and regeneration
- Criminal Justice System
- Local Assemblies attendance, representation and inclusion
- **Access to available complaints and ethnic data**
- BNP and the rise in racial prejudice
- Advice and public education against bigotry and hatred

Racial Disadvantage

8. This section provides extracts of key demographic data and some factors pointing to evidence of continuing racial disadvantage:-

- a. Lewisham Borough's total population is estimated at 259,000, with 35% (91,000), being from Black and Minority Ethnic(BME) communities. (source: ONS mid year estimates 2007)
- b. The BME communities comprise a relatively young population, with an estimated 60% of the school-aged children being of that background.
- c. One main indicator of deprivation is that of the entitlement to Free School Meals. The data for 2009 show that the entitlements for children by ethnicity were White 22.7% and BME 26.5%.
- d. School Exclusions: Over the past decade, there has been a substantial reduction in the number of children excluded from schools in the

Borough. Although this reduction has been across all racial groups, disproportionality along race/ethnic lines can be discerned from the available data. The high point for Fixed Exclusions was in 2001, when there were 2,611 children excluded, of which 1,596 were of BME background. For year 2009, the total of Fixed Exclusions was 778, of which 527 were of BME origin. When it comes to Permanent Exclusions, the total for year 2001 was 94, of which 59 were of BME origin. For the year 2009, the total of Permanent Exclusions was 21 (surprisingly comprising more girls than boys), of which 18 were from BME backgrounds.

- e. Youth (aged 18-24) unemployment data at December 2009, showed that there were higher numbers of BME young people claiming Job Seekers Allowance than their counterparts. There was also adverse disproportionality impacting on economically active BME communities, of whom only 61% were in employment, whereas their white counterparts had over 77% in employment. (Source: ONS 2009)
- f. In the twelve month period leading up to April 2009, Council data revealed that BME households were disproportionately affected as homeless persons/households. Black homeless households totaled 486, Other BME households comprised 166 and White households were 220.
- g. Of the number of young people who are first time entrants to the Criminal Justice System(CJS), more are of BME background than White young people, although there are more BME young people at risk in the population of young people as a whole, so some adjustment of such variances must be taken into account.

Options for implementation

- 9. Fundamentally, there are three options available to the Council in its response to the demise of REAL.

The *first* option is to do nothing other than for the Council to absorb REAL's functions and responsibilities into its own provision and to encourage other community-based voluntary organizations to pick up such elements as practicable. The weakness with this option, cited by BME and other consultees, is the paucity of knowledge about the limited existence of appropriate expert advisory services on inequalities, exclusion and discrimination case advocacy. This is a high risk option and would suggest that the Council is not serious about community empowerment and tackling the range of inequalities, multiple discrimination and racial disadvantage.

The *second* option is to take a broad-brush approach to equalities, community cohesion and human rights and seek to get it established under one umbrella organization for the whole Borough, almost along the lines of how the government has brought together all equalities and human rights regulatory, enforcement and promotional activities within a single body which is the Equality and Human Rights Commission. This would mean determining which existing organisation would lead this process of co-ordination and has the governance and sustainable infrastructure to take on such a demanding task. The primary benefit would be that of not having a plethora of different organizations serving the interests of a variety of different client groups of people. On the other hand, there is concern that some equality issues may lose its specific focus if all are blended into one organization. The latter view was one expressed by consultees, who were concerned to stress that they felt that race equality had already slipped down the agenda of priority policy considerations. Existing established organizations working with the elderly population and with disabled groups of people would be reluctant to accept that the best way forward for their interest groups would be to be part of a single unified body. Most people want to see a more gradualist approach to achieve the emergence of such a unified body to tackle all form of inequalities. It is fair to say that among consultees during the review there was evenly balanced support for this option and the third option.

The **third** option is to have a single focused race equality body leading on such matters at community level but linking up with all other voluntary organizations and especially those carrying some speciality in the provision of equality and advocacy support services for other disadvantaged groups of people on grounds of sex, disability, age, sexuality, religion and belief. This option is explored further in the next section. It provides developed suggestions for the Council's consideration of a "total place, one Lewisham" model to support in pursuance of the emergence of a coherent community-based and led approach to tackling inequalities, disadvantage, exclusion and diversity under a banner of "Fairness for All".

Fairness Consortium

10. This section describes one approach the Council may wish to take to fill the void left by the demise of REAL, whilst working towards a more unified initiative in pursuit of improved equality, diversity, community cohesion, human rights and increased involvement and participation by people from all diverse backgrounds across community, voluntary organization and other civic activities impacting on quality of life issues.
11. Undoubtedly, some consultees felt very strongly that the responses to the race inequality challenges in the Borough should be led by the BME communities and, in particular, the Black communities. There is no reason why that should not happen and, indeed, there is evidence that such activities form an integral and inescapable element, to varying extents, within the remit of many existing BME organizations. They not only meet special and different needs but also have to deal with issues of racism, discrimination and exclusion. However, they were not set up with the explicit and specific remit to eliminate racial discrimination, to champion equality of opportunity and to advance good race relations. That requires a specialist organization and REAL was the last such organization in existence.

- 12.** It would be possible for a local BME organization to take on such a specialist role, if one existed and expressed the wish and competence to do so but none has been forthcoming to date. Were that to happen, the Council would, of course, have to be satisfied about its competence to undertake the task and meet the demanding standards set out in any procurement specification. Similarly, it could be argued that the recently established Lewisham Ethnic Minority Partnership has the potential to carry forward the development and implementation of this project. However, in order to do so, its limited infrastructure would have to be beefed up and it would have to be well resourced with expert staff and competencies.
- 13.** An alternative route would be to establish a new body, on a phased basis, to lead initially on a small number of specifically defined areas of activity, whilst working incrementally with other stakeholders and interest groups towards establishing a co-ordinated integrated structure for all community-based equality, inclusion and diversity programmes, based on needs, demands, and available resources.
- 14.** Such a proposal, as in 13 above, would be overseen by a Consortium comprising membership drawn from all local voluntary organizations in the Borough supporting its aims and objectives and working towards the achievement of the proposed outcomes. Each organization would appoint a representative to be its member of the Consortium's Council of Management, which, within an approved constitution, would elect a six-member Non-Executive Board to be responsible for the staff and their delivery of the work programmes. In addition, there would be the establishment of a Panel of Individual Members, who support the aims and objectives of the Consortium. They would be made of independent individual committed people and especially local business owners. They would elect two members from their Panel to serve as Non-Executive members on the Board. From among its eight elected members, the Board would appoint a Chair, who would also Chair meetings of the Consortium, a Vice-Chair, a Treasurer and a Secretary. The Board would also appoint an appropriately qualified independent non-executive individual from outside

the ranks of its membership, with the specific responsibility for scrutiny and audit of staff performance, maintenance of professional standards of conduct and effective accountability, including that of governance.

15. The overall aims of the Consortium would be to :-

15.1.1 provide a focal point for voluntary and community-led responses to race equality and race relations in the Borough and to secure positive collaboration in the design of more coherent, cost effective and easily accessible and efficient arrangements for tackling all inequalities affecting the borough's diverse population.

15.1.2 engage with and involve those individuals and particular groups of people experiencing discrimination, disadvantage and exclusion in activities designed to secure their participation in civic facilities/ functions/events and to have their voices heard by all statutory agencies, public service providers and local employers. A high priority should be accorded to young people's participation.

15.1.3 liaise with and provide appropriate support to the Council and all other public service providers in the borough in the fulfillment of their statutory responsibilities with regard to equalities.

15.1.4 secure financial resources to cover operational costs and to widen the base of funding to achieve sustainability and maintain independence.

16. In pursuance of those aims the Consortium would be required to execute several tasks but principally defined as follows:-

- provide advice, guidance and support to individuals who are adversely affected by treatment that is considered to be discriminatory and disadvantaging, working and collaborating with other local

organizations that can provide specialist and appropriate advocacy assistance, as necessary.

- liaise and work with and across all voluntary sector organizations in the Borough to share good practice in tackling inequalities and establish effective arrangements to maximize the use of all specialisms and expertise existing in the range of local voluntary organizations in pursuit of fair treatment for all;
- explore shared use and better utilization of resources available to community and voluntary organizations and develop proposals for a more unified arrangement for tackling all inequalities through the third sector in the Borough.
- undertake specialist race equality advocacy casework on behalf of victims of race discrimination, harassment and victimization.
- establish and maintain dialogue through a formal partnership briefing arrangement for and with all public service authorities in the borough.
- engage with BME organizations and interest groups to collaborate and develop programmes and projects to have their voices heard about issues of racial disadvantage, all forms of inequalities, and the improvement of good relations between all communities in the borough.
- engage with young people and those organizations working with young people to ensure their involvement and engagement in civic and community activities and to have self-expression about their own particular needs.
- produce and make widely available annual reports on performance, achievements, the utilization of resources and the further tasks ahead, outlining the risks, challenges and opportunities.

- 17.** It would be vitally important to pursue a minimum of absolutely vital tasks to secure success and thus have the likelihood of moving from pilot project to the reality of greater certainty of outcomes, having regard to the

ultimate goals of achieving reduced discrimination and disadvantages, better community relations and cohesion, increased community participation and co-ordinated unified arrangements for independent voluntary activities to strengthen and support rights and responsibilities for all the Borough's inhabitants to share equally and enjoy.

- 18.** Of course, in the present difficult financial circumstances for public services provision, there must be an exploration of how best existing resources across the whole sector can be utilized to tackle issues of multiple discrimination and deprivation. Given the entrenched nature of persistent racial disadvantage and the likelihood of further disproportionality during a period of recession and austerity, the need for urgent action in pursuit of community-led anti-discrimination and equality initiatives to complement the direct Council-led provision, cannot be stressed to much.
- 19.** Should the Council decide to give support and provide resources for an independent community-led race equality Borough-wide provision along the lines described above in option 3, linked to the overall objective of establishing an integrated community-based service to tackle unfairness and inequalities, it would be required to move quickly to build on the established momentum and enthusiasm for such implementation by appointing a small steering group to prepare an implementation plan. Among its immediate tasks would be the preparation of a specification of the services required to be provided, the identification of any existing local organizations which would be willing and able to take on the tasks within specified criteria for selection and, in the event of there being none, to establish the processes and protocols to guide the setting up of the new body to take on the project.
- 20.** During the consultation meetings generated by this Review, there was enthusiasm for the approaches as emerged in option 3. Those who contributed positively in support of such provision argued vociferously for the adequate resourcing of such an initiative. Moreover, however, there was agreement that some core principles had to be key features underpinning the ultimate success of this project. These are summarized as:

(1) Governance having credibility, integrity, independence, openness and accountability; (2) The Consortium would have prominence in an accessible location and be able to publicise its services so that all people, with appropriate requirements and needs, would know where to go (a major defect with REAL) and be able to get access thereto; (3) It would be inclusive and maximize involvement of people from all backgrounds in its activities, thus complying with the spirit and letter of the public duty in the Equality Act 2010; (4) It would have independent continuous scrutiny of its performance and compliance with all standards and specification through non-executive inclusion on it's Board of Management; (5) It would seek to maximize its income and resources from the widest range of sources.

Herman Ouseley

May 2010

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MAYOR AND CABINET		
Report Title	London Borough Grants Scheme - 2011/2012 Expenditure	
Key Decision	Yes	Item No.9
Ward	All	
Contributors	EXECUTIVE DIRECTOR FOR COMMUNITY SERVICES/HEAD OF LAW/DIRECTOR FOR RESOURCES	
Class	Part 1	Date: 19 January 2011

1. Summary

The London Borough Grants Committee (LBGC) was established to provide funding for voluntary organisations offering London-wide services or operating in two or more London Boroughs. This report considers the recommendation of the Grants Committee of the London Councils on the level of expenditure for the London Boroughs Grants Scheme in 2011/12 and the proposed contribution by the London Borough of Lewisham.

2. Purpose

To consider the recommendation of the Grants Committee of the London Councils on the level of expenditure for London Borough Grants Scheme in 2011/2012 and the proposed contribution by the London Borough of Lewisham.

3. Policy Context

- 3.1 The LBGC was established in 1985 to provide funding for voluntary organisations offering London-wide services or operating in two or more London Boroughs. The thirty-two London Boroughs and Corporation of London are required by statute to contribute to the funding of London Borough Grants.
- 3.2 Lewisham's contribution to the London Councils Grants Scheme funds voluntary sector activity in Lewisham that contributes towards the vision for Lewisham outlined in the Sustainable Community Strategy. London Councils Grants Scheme also supports infrastructure development of the third sector, which assists the council with delivering local public services.
- 3.3 The Council gives grant aid to a number of organisations in pursuit of the objectives of the Council's Community Strategy, specifically to "work with the voluntary and community sector to build their capacity and to facilitate their involvement in the development and delivery of local outcomes." The grant aid also assists with the objectives set out in the Council's ten corporate priorities, particularly "Community leadership and empowerment: Developing opportunities for the active participation

and engagement of people in the life of the community”.

4. Recommendations

The Mayor is recommended to:

- 4.1 agree the overall expenditure for the London Councils Grants Scheme in 2011/2012 of £17,691,000; and
- 4.2 agree a sum of £451,716 in respect of the London Borough of Lewisham’s contribution as outlined in the London Councils’ notification to Chief Executives on 17 December 2010.
- 4.4 note a saving in 2012/13 assuming a further reduction in the Councils contribution to the Scheme (para 6.4 below)

5. Background

On 17 October 1985 the London Borough Grants Scheme was set up in accordance with the requirements of Section 48 of the Local Government Act 1985. On 1 April 2000 the London Local Authorities established a joint committee under Sections 101 and 102 of the Local Government Act 1972 and resolved to delegate various functions to the Association of London Government Grants joint committee. This was then amended at the end of 2001 to take account of the new political management arrangements. The purpose of the scheme is to provide funding for voluntary organisations offering London-wide services or operating in two or more London Boroughs. The thirty-two London Boroughs and Corporation of London are required by statute to contribute to the funding of the London Boroughs Grants Scheme.

6. Expenditure for 2011/2012

- 6.1 On 14 December 2010 the London Councils Leaders’ Committee agreed to recommend to constituent Council’s a total expenditure of £17,691,000 (£30,116,000 in 2010/11) for 2011/2012 comprising £16,793,000 (£28,400,000 in 2010/11) for grant aiding, £838,000 (£1,718,000 in 2010/11) for administrative expenditure and £60,000 for London Funders Membership fees . This would be financed by using interest and balances of £2,380,000 (£1,716,000 in 2009/10)), European Social Fund grant of £2,070,000 (£2,070,000 in 2010/2011) and contributions from Boroughs of £13,241,000. (£26,330,000 in 2010/2011).
- 6.2 The overall level of borough contributions to the Scheme represents a decrease of 49.71% compared to the current year. This decrease is as a result of a recent review undertaken of the future role and scope of the London Borough Grants Scheme (see below paragraph 7)
- 6.3 Borough contributions are in proportion to member council’s population and are calculated using the Office for Population and Census Statistics mid 2009 estimates. Although the Lewisham population has increased slightly since the previous years estimate from 261,600 to 264,500 the overall population of London has increased from 7,619.8 to 7,753.2. This has led to the apportionment for Lewisham decreasing from 3.43% to 3.41%. Lewisham’s contribution in 2011/2012

will decrease by £452,235 from £903,951 to £451,716, which equates to a decrease of 50.03%.

- 6.4 A further reduction in the scheme is expected in 2012/13. This will give a saving to the Council estimated at 16% (£140k).

7. Grants Review

- 7.1 Every four years following London local government elections, Leaders' Committee sets new priorities for the programme of commissioning by London Councils Grants Committee. Though an earlier consultation had been undertaken to scope the potential future priorities, in June 2010 the new Leaders' Committee announced a review of the London Boroughs Grants Scheme, with a view to establishing the degree to which services funded through the grants programme should continue to be funded through a London-wide Grants Scheme. The review has taken place against a background of anticipated cuts in public sector spending, and in a context where constituent Councils may not be in a position to contribute to the grants budget at the same level as previously.
- 7.2 As a result of this review the Grants Committee met on 25 November 2010 to consider the key issues arising from the review. The recommendation of this Committee, subsequently agreed by the London Councils Leaders' Committee, was that in future only services that are pan London services will be funded, with those that are sub-regional or local in nature no longer being funded through the scheme. It was agreed that funding for those organisations falling within the latter two categories will continue until 30th June 2011.
- 7.3 Of those organisations that will no longer be funded by the London Borough Grants Scheme, a number of them provide a service that the Council may wish to continue to support. There are also a number of Lewisham based organisations that have been in receipt of funding for 2010/11 that are no longer part of the revised principles and priorities. These are The Deptford Albany, Beat bullying, Artefacts Edutainment, Heart n Soul, Voluntary Action Lewisham, Creative Lewisham Agency (now Creative Process), and Groundwork. This excludes those projects funded through the European Social Fund grant (of which there is one Lewisham based group) as these will continue to be funded until their funding agreement expires. Officers are currently identifying which, if any, of the services no longer supported by London Councils Lewisham might wish to support and how this might be achieved. This will be in the context of Lewisham's grant aid priorities and criteria which are currently being reviewed. A further report will be submitted to Mayor and Cabinet for consideration.

8. Options

- 8.1 Under Section 48 of the Local Government Act 1985 the Council is obliged to participate in the scheme as it is not possible for a single borough to unilaterally decide to pull out of the Scheme. Under statute two-thirds of the constituent boroughs must agree to set up the Scheme, two-thirds of the boroughs to agree the budget (with the Secretary of State's reserve power to set a budget as at current year level if boroughs fail to agree one by 31 January) and two-thirds to decide to end the Scheme.

- 8.2 If the Council no longer wanted to participate in the Scheme then it would also need to decide whether the Scheme should continue at all. If it felt that it should not then it would need to get formal agreement from two-thirds of the membership. If it feels that it does not want to contribute in 2011/2012 then it would need to get agreement from two-thirds of the membership by 31 January 2011.
- 8.3 The Council could decide that the level of the overall budget is not satisfactory. Again two-thirds of the membership is required to set the budget so the Council would need to get agreement from this proportion to set a budget at a level it sees fit. Given the time constraints it is unlikely that this will be done by 31 January 2011 and if no decision is made by this date then the budget level for 2011/2012 will remain the same as 2010/2011. It is recommended to agree the budget at the proposed level.

9. Financial Implications

- 9.1 The report notes a proposal by the Grants Committee of London Councils to reduce expenditure funded through the London Borough Grants Scheme in 2011/12. It seeks approval for the proposed reduction and notes the financial impact on Lewisham's contribution.
- 9.2 The current budget for London Borough Grants Scheme is £900,850, marginally less than the 2010/11 costs of £903,851, as no inflation has yet been added. Proposals relating to inflationary provision in the 2011/12 budget are still being finalised. However, due to the uncertainties concerning the actual level of inflation in 2011/12, and in particular the pay award for 2011/12, it is proposed to hold the provision for inflation corporately and allocate it, as required, during 2011/12.
- 9.3 The recommended contribution of £451,716 will be met from the available budget, leaving £449,134 uncommitted. The Mayor may wish to use some of this saving to reinvest in the voluntary sector – e.g. to reinstate some of the funding for local groups losing LBGS funding. The reduction in the LBGS presents an opportunity for a revenue saving. A further report will be brought to Mayor & Cabinet about the continued funding of organisations based in Lewisham whose funding from London Councils will cease, and this will include an estimate of the scope for any saving in 2011/12.
- 9.4 A further saving of £140k is estimated for 2012/13 (para 6.4 above)

10. Legal Implications

The legal implications of continuing with Lewisham's contribution to the Scheme or withdrawing from it are set out in the body of this Report.

11. Crime and Disorder Implications

A number of organisations that work within the crime and disorder field providing a service in Lewisham are funded by London Councils.

12. Equality Implications

London Borough Grants funds an extensive number of services targeted at tackling the needs of individuals and groups excluded from mainstream economic, social and cultural opportunities. A number of organisations that will no longer be supported by the London Borough Grants Scheme provide services to individuals that fall within the equalities strands as identified in the Equalities Act 2010. In considering whether Lewisham wishes to fund any of the services no longer supported through the grants scheme the Council's equalities duties will need to be considered.

13. Environmental Implications

A number of environmental organisations providing a service in Lewisham are funded by London Councils.

14. Conclusion

The report outlines the background to the London Borough Grants Scheme, and details Lewisham groups funded in the current financial year and proposes that the Council approve the recommended budget as set out in the London Councils' notification to Chief Executives for the reasons outlined in paragraph 8 above.

BACKGROUND PAPERS

None

If you would like more information on this report please contact Sandra Jones of Community Services Directorate's Community Sector Unit on 0208 314 6579.

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Mayor and Cabinet			
Report Title	The 2009 Annual Social Services Performance Letter from the Care Quality Commission (CQC) and PAN		
Key Decision	Yes	Item No.	10
Ward	All Wards		
Contributors	Executive Director for Community Services		
Class	Part 1	Date:	19 January 2011

1. Summary

This report advises the Mayor and Cabinet of the outcome of the 2009/10 Annual Performance Assessment of Adult Social Care (ASC) Services in Lewisham which was released by Care Quality Commission (CQC) on 25 November 2010. The CQC judged ASC Services to be delivering outcomes well for the people of Lewisham. CQC rated the service as grade 3 out of a range from 1 to 4, where 1 is poor and 4 is excellent.

2. Purpose

As requested by the Care Quality Commission (CQC), this report presents the Annual Performance Assessment of ASC Services to the Mayor and Cabinet.

3. Policy Context

ASC Services contribute to the delivery of key priorities identified in 'Shaping our future – Lewisham's Sustainable Community Strategy, specifically its ambition to promote communities that are 'Healthy, active and enjoyable – where people can actively participate in maintaining and improving their health and wellbeing. In addition ASC services support the Council's Corporate Strategy priorities of caring for adults and older people and active, healthy citizens.

4. Recommendations

The Mayor is recommended to:

- 4.1 note the outcome of the annual performance assessment for 2009/10 and the rating that the Council has received; and
- 4.2 agree that where improvements have not already been addressed and achieved, officers should include specific actions to achieve them in relevant service improvement plans for 2011/12.

5. The Annual Performance Letter, Grading and Performance Assessment Notebook

5.1 The gradings summarise CQC's judgement of the performance of adult social care services. The judgements are based on evidence drawn from a range of quantitative and qualitative data collected throughout the year. The judgements are delivered in an annual performance letter accompanied by a Performance Assessment Notebook (PAN). Gradings for all councils were published this year on 25 November 2010.

5.2 The grades used and Lewisham's position (shaded) is as follows:

Grade	Descriptor
Grade 4: (Performing excellently) People who use services find that services deliver well above minimum requirements	A service that overall delivers well above minimum requirements for people, is highly cost-effective and fully contributes to the achievement of wider outcomes for the community.
Grade 3: (Performing well) People who use services find that services consistently deliver above minimum requirements	A service that consistently delivers above minimum requirements for people, is cost-effective and makes contributions to wider outcomes for the community.
Grade 2: (Performing adequately) People who use services find that services deliver only minimum requirements	A service that delivers only minimum requirements for people, but is not consistently cost-effective nor contributes significantly to wider outcomes for the community.
Grade 1: (Performing poorly) People who use services find that services do not deliver minimum (performing adequately) requirements	A service that does not deliver minimum requirements for people, is not cost-effective and makes little or no contribution to wider outcomes for the community.

5.3 In summary, the inspectors highlighted the following as key strengths:

- the single point of access to social care advice which consistently deals efficiently with a high volume of calls;
- high levels of satisfaction among people using services;
- improved services to Carers with a high percentage of carers undergoing an assessment;
- the integrated client database which allows the sharing of client information between partners;
- Lewisham achieving the highest level on the Local Government Equalities Framework for a number of years;

- All action plans developed from Equality Impact Assessments are monitored;
- the Council is a major employer in Lewisham and supports staff who are carers to work flexibly;
- the Council has invested time and resources to support residents in mitigating the effects of the recession;
- all recommendations from the CQC safeguarding inspection were implemented;
- the Council having commissioned an independent review of safeguarding and accepting all the recommendations from that;
- then completion rate of safeguarding investigations is above that of comparator boroughs;
- the Council has reported good progress in meeting the putting people first milestones and are on track to meet future targets including the national target on people using personal budgets;
- strong, stable and engaged political leadership;
- low staff turnover and absence rates;
- extensive engagement and consultation with service stakeholders and the community; and
- joint commissioning between the council and PCT for health and adult social care.

5.5 As well as highlighting a number of strengths, the PAN identified a number of areas for further development. These included:

- working towards reducing waiting times for adaptations;
- demonstrating that nursing homes for young adults are compliant in care planning and review;
- demonstrating that the many new initiatives put in place are improving outcomes for service users and carers;
- ensuring assessments are carried out in a timely manner;
- sustaining progress on self directed care;
- increasing efforts to support carers back into employment;
- demonstrating improved outcomes for people with learning disabilities seeking work;
- continuing to raise public awareness about the risks of abuse and neglect to vulnerable people and what people can do if they have concerns;
- monitoring attendance at safeguarding training across partner organisations;
- addressing staff skills in regulated services through workforce development; and
- continuing to work in partnership with the PCT to develop Joint Strategic Needs Assessments in more accessible formats.

5.6 As highlighted above, the performance assessment relates to the period 2009/10. The modernisation and improvement of adult social care and health services continues to be a key strand of work within Community Services Directorate and regular feedback throughout 2010 has been given to CQC on the progress that has been made in the areas highlighted

above. Since the assessment period in question, the transformation programme has continued to make good progress, with stakeholders fully engaged and contributing to service development.

- 5.7** Where further improvements are still necessary, actions have been identified and will be incorporated into the Directorate's service planning processes. These plans will be subject to continued scrutiny by management, relevant partnership boards and CQC.

6. Financial Implications

- 6.1** The report recommends that where improvements have not already been addressed and achieved, as set out in paragraph 5.5, specific actions to achieve them should be included in 2010/11 service improvement plans.

- 6.2** All activity to address suggested areas of improvement will be funded from within ASC budgets.

7. Legal Implications

The annual performance assessment process is determined by the Secretary of State for Health and carried out through the Care Quality Commission.

8. Crime and Disorder Implications

There are no direct crime and disorder implications.

9. Equalities Implications

- 9.1** The annual performance assessment process pays close regard to the equality issues; these are embedded in the standards against which services and functions are evaluated and judged.

- 9.2** All improvement plans will address equality dimensions of adult social care services and seek to ensure that measures to reduce inequalities are incorporated.

Background Documents

CQC's full report detailing the Adult Social Care performance judgements for 2009/10 can be found at http://www.cqc.org.uk/db/documents/CAPA10_lewishamassessmentofperformancereport10.pdf

For further information regarding this report, please contact Joe Knappett, Service Manager Performance, Community Services on 0208 314 8544.

MAYOR & CABINET		
Report Title	Proposed Jevington Way Article 4 (1) Direction	
Key Decision	Yes	Item No. 11
Ward	Grove Park	
Contributors	Head of Planning and Head of Law	
Class	Part 1	Date: 19 January 2011

1. Summary

- 1.1 This report is in respect of a proposed Article 4 (1) Direction covering Jevington Way, with particular regard to the green amenity created by the front gardens and extensive grass verges along the length of the road. The report informs about the threat to the amenity by the creation of hard standings for car parking and of cross-overs under permitted development rights. It recommends that an Article 4 (1) Direction should be made in order to ensure the future protection and enhancement of the area and streetscene.

2. Purpose

- 2.1 To provide the necessary information to support the making of an Article 4 (1) Direction covering the area as shown in the attached map.

3. Policy Context

- 3.1 The contents of this report are consistent with the Councils policy framework. The making of the Article 4 Direction will contribute to the 'Clean, green and liveable' objective in the Sustainable Community Strategy (i.e. improving environmental management and promoting a sustainable environment), and the corresponding clean green and liveable priority, notably improving environmental management and promoting a sustainable environment. Consistency with Council Local Development Framework Documents is explained below.
- 3.2 Relevant policies in the adopted Unitary Development Plan (July 2004) include URB 3 Urban Design, URB 12 Landscape and Development and URB 13 Trees. The additional Open Space policies are relevant:-

STR.OS 3 To protect and wherever possible enhance nature conservation and biodiversity in the Borough.

- 3.3 UDP policy STR.URB 4 states that the Council will "protect the best in our environment and enhance and improve the environment in areas of the Borough where social and environmental conditions are poorest."

3.4 Policy URB 3 Urban Design states:-

'The Council will expect a high standard of design in new development (...) whilst ensuring that schemes are compatible with, or complement the scale and character of existing development, and its setting (including any open space). Where appropriate, the following factors will be taken into consideration:-

(k) the preservation and creation of urban form which contributes to local distinctiveness such as plot widths, building features and uses, roofscape and open space;

3.5 The London Plan advises Boroughs to consider the need for protecting all types of open spaces, including the protection of local open spaces that are of value to the local community or spaces that have special quality or character in heritage conservation terms.

- Policy 3D.11 (*Open space provision*) asks Boroughs 'to identify, promote and protect Green Corridors and Green Chains and include appropriate designations and policies for the protection of local open spaces that are of value, or have the potential to be of value, to local communities'.
- Policy 3D. 12 (*Open space strategies*) advises that 'Boroughs should (...) produce open space strategies to protect, create and enhance all types of open space in their area.
- Policy 4B.12 (*Heritage conservation*) says that 'Boroughs should identify areas, spaces, historic parks and gardens, and buildings of special quality or character and adopt policies for their protection and the identification of opportunities for their enhancement'.

4. Recommendation

4.1 The Mayor is recommended to approve the following:

- Approve the making of an Article 4 (1) Direction to the area as shown in the attached map Appendix 1.

5. Background

5.1 Jevington Way is located in the south-east part of the Borough of Lewisham, close to the boundary with London Borough of Bromley. It does not lie within a Conservation Area, but has a special character. This is created by the front gardens to the properties and by the wide Highways grass verges, measuring about 4.7 metres in width, on both sides of the road. It provides an uninterrupted green corridor along the full length of a road which is unique in the borough.

5.2 Jevington Way was built in the 1930's on a suggested line for a South Circular road diversion. This accounts for the unusual wide grass verges to either side of the road to allow for its future widening. In anticipation of the diversion all the

properties were also provided with private rear access roads. As a result, more front gardens and boundaries have been preserved in Jevington Way than in the surrounding streets or other streets in comparable residential areas. There is a certain level of on-street parking that takes place, but most occupiers have created off-street parking in the form of garages in the rear gardens.

- 5.3 The houses in Jevington Way are a mixture of semi-detached and terraced houses, dating from the inter-war period. As is typical for this period, houses are well set back from the road via deep front gardens. Brick boundaries were kept low creating a smooth transition of front gardens and green highways verges which contributes to the green and open character of the street.
- 5.4 The character and amenity of the street has been affected by the loss of front gardens and their paving over to create 'maintenance free' front areas or car parking. The latter has usually involved the removal of boundaries and loss of the traditional distinction between public footpath and private garden. In a number of individual cases, the front boundaries have been raised – in one case to create a 'gated' drive – which have had an urbanising effect on the character of the area.
- 5.5 As a consequence of changing front gardens to car parking areas, some residents have applied for vehicle crossovers over the verge which would create a significant loss of green amenity in each case and diminish the value of the verges as corridors for wildlife. The number of applications has recently increased posing a real threat to this landscape corridor.
- 5.6 The above mentioned changes can currently be carried out under permitted development rights and the Council's Highways Department cannot legally refuse the creation of crossovers on amenity grounds. Cumulatively, these changes can erode and permanently damage the character of Jevington Way. It is therefore considered appropriate to introduce an Article 4 (1) Direction that withdraws the relevant permitted development rights for the protection of the area.

6. Article 4 (1) Direction

- 6.1 An Article 4 (1) Direction is a provision that can be introduced to better protect and manage an area's character by withdrawing permitted development rights for certain types of development and requiring that an application for planning permission is made. Local Authorities can withdraw certain permitted development rights if they consider that the development to which the direction relates would constitute a threat to the amenity of an area. The area in question does not necessarily need to be within a Conservation Area, although this is often the case.
- 6.2 In view of the character of Jevington Way, it is recommended that permitted development rights are removed only from the following four classes within Schedule 2 the Town & Country Planning (General Permitted Development Order 1995 (as amended):

- **The construction or replacement of a hard surface** (Class F of Part 1),
- **the erection or alteration of boundary treatments** (Class A of Part 2),
- **the formation, laying out and construction of a means of access to a highway** (Class B of Part 2), and
- **the demolition of the whole or any part of any boundary treatments** (Class B Part 31).

It is also considered that the restrictions should only apply to areas facing Jevington Way, usually the front gardens..

- 6.3 The effect of making such a Direction is that those works are no longer automatically permitted and that planning permission has to be sought for them. There would be a presumption against the removal of existing front boundaries where these contribute to the character of the area and against the paving over of front gardens and the creation an crossovers. With regards to alterations to or replacement of existing hardstanding or boundaries treatments, the Direction would enable the planning service to retain some control over the design and detailing of the proposals.
- 6.4 An Article 4 (1) Direction withdrawing Part 1 permitted development rights only applies to dwelling houses as only these enjoy extensive permitted development rights Houses subdivided into flats or apartment blocks do not have Part 1 permitted development rights. In contrast Part 2 permitted development rights are not limited to dwelling houses. An Article 4 (1) Direction cannot be applied retrospectively requiring owners undertake remedial works where works were carried out prior to the making of the direction.
- 6.5 Part of the process of making an Article 4 (1) Direction involves statutory notification of the direction inviting representations. The Direction comes into force when statutory notification of it is given. Planning permission is then required for carrying out the classes of former permitted development specified on the Direction. The Council is required to confirm the Direction within six months, or it lapses.

7. Public Consultation

- 7.1 Some residents of Jevington Way have repeatedly asked the Highways Department to protect the grass verges and refuse applications for the creation of crossovers. Following the increased number of such applications, in March 2009 Highways sent out a brief questionnaire to all residents asking them their views on the construction of vehicle crossovers and footpaths across the verges. It did establish that the great majority of residents, i.e. 76 percent, see the verges as a valuable amenity and want to see them maintained.
- 7.2 When an Article 4 (1) Direction is made a public consultation exercise is carried out. Following statutory consultation, residents are invited to make representations concerning the direction during a period of at least 21 days. The notice will be accompanied by a guidance sheet explaining what an Article 4 (1) Direction is, and why one has been made in this particular case. The Council

then has to consider the representations received before deciding whether to confirm the Direction.

8. Financial Implications

- 8.1 There will be some costs in advertising, mailings and printing the final documents associated with the making of the Article 4 (1) Direction. All these costs are contained within the existing 20010/11 planning budget.
- 8.2 Section 108 of the Town and Country Planning Act 1990 makes provision for compensation to be paid by the local planning authority either if an application for development is refused which would normally have been permitted development before an Article 4 (1) Direction was introduced or grant planning permission subject to more limiting conditions than the General Permitted Development Order 1995 would normally allow, as a result of an Article 4 (1) Direction being in place. Section 107 sets out the method for assessing such compensation, which is strictly limited to the abortive costs associated with the planning application and any other loss, which is directly attributable to the Article 4 (1) Direction being made. The Council is only liable to pay compensation on planning applications made within 12 months of the Article 4 (1) Direction being introduced. The making of a Direction creates this right. Such payments are made from the planning budget.

9. Legal Implications

- 9.1 Under the latest amendments to the Town and Country Planning (General Permitted Development) Order 1995, which came into force on 6 April 2010, Local Authorities can withdraw certain permitted development rights if they consider that the development to which the direction relates would be prejudicial to the proper planning of their area or constitute a threat to the amenities of their areas. It cannot be applied retrospectively to development which has already been carried out prior to the making of the direction.
- 9.2 The procedure for making an Article 4 (1) Direction is prescribed in Article 5 and 6 of the Order. There is no requirement to give notice to owners and occupiers affected by the Direction prior to the making of it. On the making the direction statutory consultation occurs. The Direction expires six months after the date the Direction is made unless it is confirmed by the local planning authority after it has taken into account any representations received following consultation.

10. Human Rights Implications

- 10.1 Under the Human Rights Act 1998, the Council must not act in a way which is incompatible with the rights referred to in the Act. There is an exception to this, in that the Council will not be acting unlawfully if Acts of Parliament mean that it can not act in any other way.
- 10.2 The relevant human rights in this instance are the:
- right to respect for the home, under Article 8; and

- right to peaceful enjoyment of possessions, under Article 1 of Protocol 1.
- 10.3 However, these rights are not absolute, and may lawfully be infringed in certain defined circumstances. Where infringement is permissible, it must occur in accordance with, or subject to the conditions provided for by the law. It must also be proportionate; ie, it must achieve a fair balance between competing interests and not go beyond what is strictly necessary to achieve the purpose involved.
- 10.4 In the case of Article 8, permitted infringements include those necessary for the protection of the rights and freedoms of others. With regard to Article 1 of Protocol 1, controls over the use of property are permissible where they are in the public interest. The right of a person to undertake changes to their properties, in reliance on permitted development rights, is covered by the exceptions to these two Articles.
- 10.5 As the Council's powers for controlling the exercise of permitted development rights are contained, and subject to the procedures set out, in the Town and Country Planning (General Permitted Development) Order 1995 as amended their use occurs within the provisions laid down by the law, and is proportionate. The effect of removal of permitted development rights is that a householder will need to obtain formal planning permission before undertaking the categories of work referred to in this report. This creates a further safeguard, in that if planning permission is refused by the Council, then the usual right of appeal to the Secretary of State is available.

11. Crime and Disorder Implications

- 11.1 There are no direct crime and disorder implications.

12. Equalities Implications

- 12.1 Equal opportunities will be achieved by making the documents available equally to all and providing other formats when necessary. Documents will be available on the Council's website, in local libraries and displayed in planning reception.

13. Environmental Implications

- 13.1 The protection of front gardens, Highways grass verges and trees are relevant for maintaining both a high quality environment and landscape corridors for wildlife.
- 13.2 Maintaining trees, front gardens and grass verges helps maintaining natural permeability. This reduces surface water run-off and the risk of flooding. Jevington Way falls within an area that is at risk of flooding from the River Quaggy.

14. Conclusion

- 14.1 The character of Jevington Way is considered special and the wide grass verges and green corridor they form are a landscape asset to the borough. The amenity is considered worthy of protection.
- 14.2 Due to recent threats to the amenity, it is recommended to approve the making of an Article 4 (1) Direction for the future management and preservation of Jevington Way, including all the properties as indicated on the map Appendix 1.

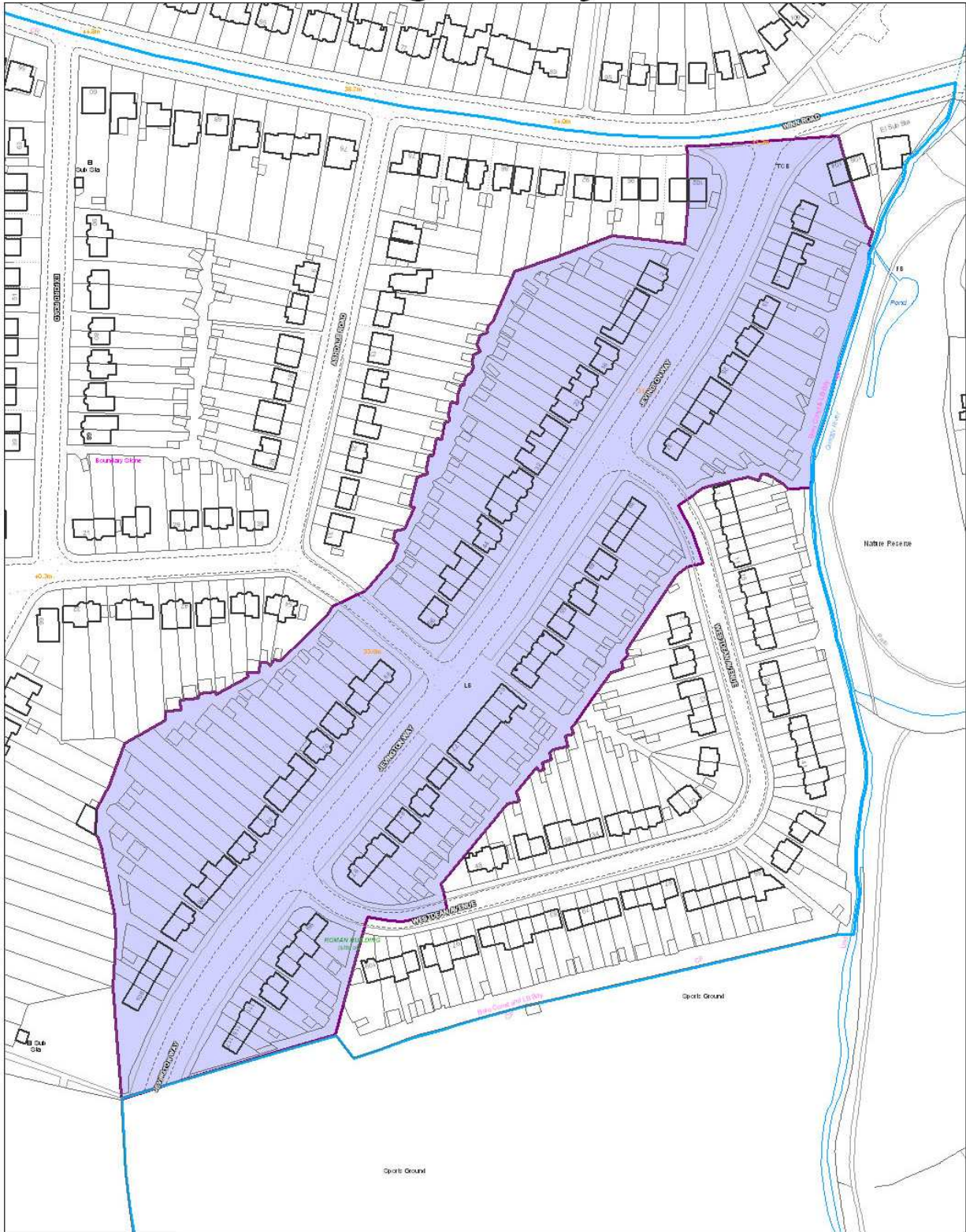
15. Background documents and originator

Short Document	Title	Date	File Location	File Reference	Contact Officer	Exempt
Town and Country Planning (General Permitted Development) Order		1995	Laurence House	Urban Design and Conservation	Phil Ashford	No
London Borough of Lewisham Unitary Development Plan		2004	Laurence House	Urban Design and Conservation	Phil Ashford	No
The London Plan		2004	Laurence House	Urban Design and Conservation	Phil Ashford	No

If you have any queries on this report, please contact Regina Jaszinski, Senior Conservation Officer, 5th floor Laurence House, 1 Catford Road, Catford SE6 4RU - telephone 020 8314 9112

Appendix 1: Map of Jevington Way showing area to be covered by Article 4 Direction

Jevington Way



Proposed Area to be covered by Article 4 Direction

Dec 2010

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Appendix 2: Photographs of Jevington Way





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Agenda Item 12

Mayor and Cabinet			
Report Title	Comments of the Elections Committee on the Electoral Agenda: the next five years		
Key Decision	No	Item No.	12
Ward	All		
Contributors	Pensions Committee		
Class	Part 1	Date	January 19 2011

1. Summary

- 1.1 This report informs the Mayor and Cabinet of the comments and views of the Elections Committee, arising from discussions held on the Electoral Agenda: the next five years, at the Committee's meeting on 18 October 2010.

2. Recommendation

- 2.1 The Mayor is recommended to consider and comment upon the issues raised by the Elections Committee on the report "Electoral Agenda: the next five years".

3. Elections Committee Views

- 3.1 On 18 September 2010. The Elections Committee considered the attached report "Electoral Agenda: the next five years." The minutes of that meeting are also attached.
- 3.2 The Elections Committee would like to make the following comments to the Mayor and Cabinet:
- 3.3 After reviewing and noting the impact of the forthcoming electoral agenda and legislative changes in the next five years, the Committee agreed additional proposals. The committee feels that their additional recommendations should be considered in order to ensure that the committee are informed on progress and consulted on all matters related to electoral changes, especially on boundary changes.

4. Financial Implications

- 4.1 There are no financial implications arising out of this report per se, although the financial implications of accepting the Committee's recommendations will need to be considered.

5. Legal Implications

- 5.1 The Constitution provides for Select Committees to refer reports to the Mayor and Cabinet, who are obliged to consider them.

BACKGROUND PAPERS

Electoral Agenda: the next five years (18.10.10)

Elections Committee minutes (18.10.10)

If you have any queries on this report, please contact Evelyn Akoto, Committee Officer (0208 3149678), or Kevin Flaherty, Head of Committee Business (0208 3149327).

ELECTIONS COMMITTEE		
Report Title	Electoral Agenda: the next five years	
Key Decision	No	Item No.
Ward	All	
Contributors	Chief Executive and Head of Law	
Class	Part 1	Date: 18 October 2010

1. Purpose

- 1.1 This report provides the Committee with an outline of anticipated referendums, elections, statutory reviews and relevant legislative changes over the next five years (2010 – 2015) and their impact on Lewisham’s forthcoming electoral agenda.

2. Recommendations

- 2.1 The Committee is advised to note the report and the impact of the forthcoming electoral agenda and legislative changes.

3. Background

- 3.1 The new Government has put forward an ambitious programme for political and electoral reform which, if implemented, will have a significant impact on how elections are managed, the political landscape and the voter experience. Over the next five years there will be a number of new and additional requirements adding to the already complex legislative framework that surrounds elections. There is proposed legislation that may totally change the voting system, the number of MPs to be voted for and new national requirements in relation to electoral registration.

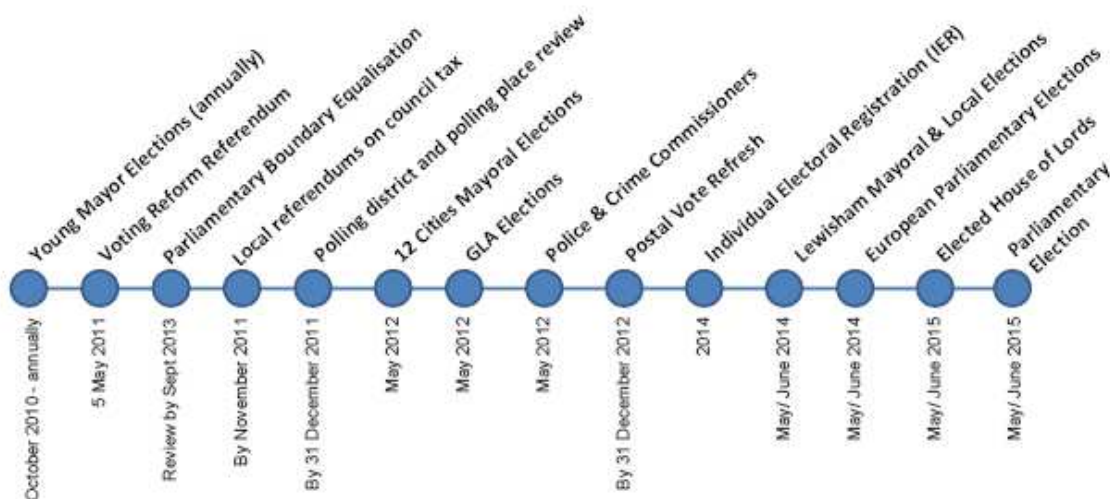
- 3.2 The Association of Electoral Administrators notes that already:

“Over 25 separate pieces of primary and secondary legislation (some of which have been amended on several occasions) governed the administration of the elections that took place across the UK in May 2010.”¹

¹ Association of Electoral Administrators., Beyond 2010: the future of electoral administration in the UK. 2010.

The agenda set out in this report is very likely to increase that complexity.

4. Electoral Agenda (2010-2015)



4.1 Set out below are the anticipated referendums, elections, statutory reviews and relevant legislative changes proposed over the next five years (2010-2015). Due to pending legislation, there are still some unknowns in terms of local implications and dates. Where this is the case, these have been identified.

4.2 The Parliamentary Voting System and Constituencies Bill (early 2011)

4.2.1 The Parliamentary Voting System and Constituencies Bill (subsequently referred to as “the Bill”) is currently before Parliament. The Bill would, if passed, introduce significant changes to the electoral process in the United Kingdom. It proposes to introduce a voting reform referendum for the new alternative vote (A.V) system (see 4.3 below), as well as to reduce the number of MPs in the House of Commons from 650 to 600 and establish boundary reviews to create more equally sized constituencies (see 4.4 below).

4.2.2 It is anticipated that the Bill will receive assent in Jan/Feb 2011. However, the proposed regulations and rules detailing some of the implementation have been released as part of the Bill.

4.3 Voting Reform Referendum (5 May 2011)

4.3.1 In addition to a proposal for new boundary arrangements and equalising of Parliamentary constituencies, the Bill also proposes:

- 4.3.1.1 A UK – wide referendum on whether the UK should move to the alternative vote system for UK Parliamentary elections;
- 4.3.1.2 Details of the AV system that would be brought into if there were a “yes” vote at the referendum (see appendix 1 for an example of an AV ballot paper and the existing First Past the Post ballot paper as well as an example of a supplementary vote ballot paper).
- 4.3.2 Whilst Lewisham has held a referendum before (in 2001 for the directly elected Mayoral model), like every other local authority, it has not hosted one at a national level since the 1975 European Communities membership referendum.
- 4.3.3 Unless and until the Bill receives Royal Assent (if passed likely to be in early 2011) there will remain a lack of clarity which will hinder local planning. For example, it is not yet known what date the count will be scheduled for, as this will need to be synchronised across the UK to take into account areas where multiple elections are held. It is also unknown who the Regional Counting Officer will be or whether additional questions will be added to the referendum paper.
- 4.3.4 There will be considerable publicity and awareness campaigns organised by the Electoral Commission. It is also likely that there will be a ‘Yes’ and ‘No’ campaign at a national level and may involve politicians from all parties in both of these campaigns. Despite this there may still be a degree of voter confusion at this referendum (see appendix 2 for an example of a referendum ballot paper).
- 4.3.5 Appendix 3 sets out the most recent advice from the Electoral Commission in relation to the Referendum campaign issued in September 2010.
- 4.3.6 Given the extent of preparation required under this new legislation, and the extent of existing ambiguity, the Association of Electoral Administrators (AEA) endorse findings from the Gould² report on the 2007 elections in Scotland and state that that;

“Except in cases of unforeseen emergencies, changes to election law should not be applicable to any elections within a six-month period from the date the legislation comes into effect”³

Despite this, if passed, there will only be approximately four months in which to prepare for the referendum, thereby failing to comply with the Gould recommendations.

² Independent Review of Scottish Parliamentary and Local Government Elections, Ron Gould, 2007.

³ Association of Electoral Administrators., Beyond 2010: the future of electoral administration in the UK. 2010.

- 4.3.7 The Bill makes provision for the fees and charges for the referendum to be on the same basis as that in place for the European Parliamentary Elections in 2009 and the UK Parliamentary General Election in 2010. It is still unknown what the upper fee limit will be to host the referendum, and the extent to which it will increase existing financial pressure.
- 4.3.8 If the referendum results in a 'Yes' vote then English local government will be the only tier of government in the UK which will not be based some form of proportional representation. This may prompt pressure for some form of proportional representation to be introduced locally. This is a position which the Council has previously considered and supported.

4.4 Parliamentary Boundary Equalisation (review by September 2013)

- 4.4.1 Under the Parliamentary Voting System and Constituencies Bill, boundary changes have been made to reduce the size of the House of Commons from 650 to 600 by the next General Election. The Bill also proposes new rules for the redistribution of seats.
- 4.4.2 The rules will give priority to numerical equality as a principle, in that there will be a uniform electoral quota for the UK, and seats may not vary by more than 5 per cent from the quota, with some limited exceptions. Regular redistributions would take place every five years. The Parliamentary Boundary Commission is to conduct a review by the end of September 2013 with subsequent reviews every five years.
- 4.4.3 The equalising of electoral boundaries will be based upon the electoral register as at 1st December 2010, making the canvass leading up to this point particularly significant.
- 4.4.4 The new approach to reviewing constituency boundaries, with its emphasis on numerical equality according to the "quota" is likely to bring about the creation of many new constituencies, and constituencies that cross local government boundaries.
- 4.4.5 Based on 2009 figures, the reduction in constituencies means that the quota per constituency is approximately 75,700 (total UK electorate of approximately 45.4 million divided by 600). In London, the total electorate for 2009 approximated 5.3 million. Therefore the number of MPs for London is likely to be in the region of 70, a reduction of 3 on the current number of 73. The average size of a constituency for the Lewisham area is likely to rise from approximately 67,300 to in the region of 75,700. This is an increase in the average size of a London constituency of over 3,000, and of over 8,000 for Lewisham constituencies. Given this, it is likely that

Lewisham's parliamentary constituency boundaries will be expanded even further across local government boundaries.

4.5 Local referendums on Council Tax and other local matters (by November 2011)

4.5.1 The Government intends to introduce legislation through the Decentralisation and Localism Bill (expected to become law by November 2011) requiring a local authority setting an excessive council tax increase to hold a referendum. This referendum would be legally binding, as opposed to a consultative poll.

4.5.2 The purpose of this Bill, if passed, would be to:

4.5.2.1 Ensure that excessive council tax increases occur only where they have a clear mandate from local people.

4.5.2.2 To abolish existing central government capping powers.

4.5.3 The Government anticipate that the costs of organising a referendum are in the range of £70,000-250,000⁴. These costs are to be met by the relevant local authority.

4.5.4 The proposals would require local authorities to prepare a shadow budget and (if necessary) repay council taxpayers depending on the outcome of the referendum.

4.5.5 The Government also intends to make provision in the same Bill for local referenda to be held on receipt of a petition signed by enough local people requesting a referendum on a matter of local concern. The detail of these provisions is of course yet to be fleshed out in the legislation.

4.6 12 Cities Mayoral Elections (from November 2011 – elections in May 2012)

4.6.1 The Decentralisation and Localism Bill, if passed, will enable and may require the largest 12 cities in England to have Mayors from 2012, subject to confirmatory referenda and full scrutiny by elected councillors, with elections taking place in May 2012.

4.6.2 The Government will begin developing options for the transition to mayors from November 2010 which will provide more clarity relating to the timetable for the referendums. It is expected that the Bill will become law in November 2011 and this is likely to prompt increased interest in the elected Mayor model.

⁴ Decentralisation and Localism Bill – Provision for referendums to veto excessive council tax increases: Impact assessment – consultation stage, August 2010.

4.7 Police and Crime Commissioners (May 2012– date unconfirmed)

- 4.7.1 The consultation paper *Policing in the 21st Century: Reconnecting Police and the People* (July 2010) outlines plans to introduce directly elected Police and Crime Commissioners. The Government's stated intention in introducing these measures is to make police services in England and Wales "more accountable to the public and responsive to local people, more focused at a national level and more effective at tackling crime, as well as providing better value for money" (Home Office, 2010).
- 4.7.2 Currently, there is no plan for a Police and Crime Commissioner to be elected in London. This is due to the directly elected London Mayoral model in which the Mayor (or his deputy) takes the lead for the Metropolitan Police Authority. However, if and when police authorities in other parts of the country are abolished and elections for Police and Crime Commissioners take place, this may call into question the arrangements in London and bring pressure to bear for a move to harmonise the London arrangements with the rest of the country.

4.8 Individual Electoral Registration (IER) 2014

- 4.8.1 IER will be introduced in order to modernise the electoral registration system and reduce fraud (as announced by the Government 15 September 2010).
- 4.8.2 From 2014, voters will be required to provide their date of birth, signature and national insurance number, which will be cross-checked, before they can be added to the electoral register. The process will replace the existing system of household registration, in which one person at each address is responsible for providing the names of eligible voters who live there. The wider resource implications relating to this are yet to be addressed nationally.
- 4.8.3 The measure will speed up the timetable for implementing individual registration, which was not previously due to replace household registration until 2015 at the earliest. The promise to speed up individual electoral registration was contained in the Government's Coalition Agreement and details were set out by Mark Harper, Minister for Political and Constitutional Reform, in an oral statement to Parliament. A draft Bill is to be introduced this Parliamentary session, to be followed by legislation.
- 4.8.4 No voters will be removed from the electoral register for not registering individually until after the next General Election, due to take place in May 2015, giving people at least 12 months to comply with the new requirements so the impact of IER on voter registration is likely to be felt in 2016. Any new registrations from 2014 will be

on an individual basis and from that point voters will also need to register individually to cast a proxy or postal vote.

4.8.5 In Great Britain, there is currently an annual canvass process based on household registration, and an individual rolling registration process that enables registration up to 11 days before polling day. Neither of the systems provide for the collection and verification of personal identifiers. Similarly, apart from names and addresses of voters, voter lists currently do not contain any personal identifiers to distinguish voters, and voters are not obliged to present any identification to be able to vote. To verify the individual identifiers would require the introduction of a data matching exercise, potentially using national databases and introduce greater complexity in the administration of electoral registration.

4.8.6 IER also has implications for voter engagement, with the real possibility that this could disproportionately affect certain groups who do not have, or do not want to disclose, their National Insurance number. When introduced in Northern Ireland (2002) a 10% drop in registration levels was observed⁵. The introduction of IER will mean that intensive efforts will need to be made to encourage all to register and minimise this decline.

4.9 **Combined European and Lewisham Mayoral & Local Elections (June 2014)**

4.9.1 The UK European Union (EU) Parliamentary elections will take place in June 2014. The number of Members of the European Parliament (MEPs) that are elected from each party to represent a region depends on the overall share of votes that each party receives. The whole of London elects eight MEPs, selected on a form of proportional representation known as the party list system.

4.9.2 The Lewisham Council and Mayoral Elections are scheduled to take place in May 2014. However, given the closeness of the European Parliamentary Elections (June 2014) it may very well be that the elections will be combined. As the EU elections are the major election, if combined, the local elections would move to June, subject to the necessary statutory amendments to facilitate this. The combination of elections would mean there would be three different voting methodologies in place (supplementary voting in the Mayoral election; first past the post for multi-member wards in the local councillor elections; and the party list system for the European election). This increased complexity could result in voter confusion.

⁵ PriceWaterhouseCoopers - The Electoral Commission Northern Ireland desk research - Final report 2003

4.10 Parliamentary Election (2015 – held on or before 11th June)

4.10.1 This general election will be the first at which the major reforms to the electoral system set out in this report are likely to be in place. The Parliamentary Voting System and Constituencies Bill would, if passed, introduce significant changes to the electoral process in the United Kingdom. As well being the first potential election counted on the new A.V system, 600 MPs rather than 650 will be being elected to the UK Parliament, for new constituencies in which the number of voters have been equalised.

4.10.2 It is also proposed that in future Parliament will be for a fixed 5 year term with no discretion for the Prime Minister to call an earlier election.

4.11 Elected House of Lords (2015)

4.11.1 Subject to the legislation being put in place, the election for the House of Lords is likely to fall at the same time as the Parliamentary Election (held on or before 11th June 2015). The House of Lords Bill is before Parliament in 2011 and if and when passed will provide additional clarity. If combined with the Parliamentary election, this will add complexity and possible voter confusion.

4.12 GLA Elections May 2012

4.12.1 The GLA elections include the election of the London Mayor, Assembly and Constituency members. It has been decided that these will continue to use electronic counting and the count is to be held at the Excel Centre, which is to be one of several multi constituency counting centres, as in 2008.

4.12.2 This is a joint borough election with Lewisham being the lead borough for both Greenwich and Lewisham as it has the larger electorate. As such, Lewisham's Returning Officer will be the Constituency Returning Officer responsible for the count across both boroughs.

4.13 Young Mayor Elections (13 October 2010 - annually)

4.13.1 Though of course not a statutory requirement, Lewisham introduced its Young Mayor Elections in 2004. These are run annually and have proved a success involving many young people in civic engagement. In the 2010 election there were 35 polling stations, and early voting (two days prior) at four polling stations. In 2009, 9,616 ballot papers were included in the count,

which was equivalent to 52.5% turnout for the electorate eligible to vote.

4.14 Polling district and polling place review (by 31st December 2011)

- 4.14.1 The Electoral Administration Act 2006 (EAA) introduced new regulations requiring all local authorities to review their polling districts and polling places by the end of 2007, and on a four yearly basis thereafter. Each polling district must have sufficient and suitable designated polling places that provide 'such reasonable facilities for voting that are practicable in the circumstances' including accessibility for electors with disabilities.
- 4.14.2 Lewisham carried out the first of these reviews under the Act in 2007 which looked at the 109 polling districts and included a public period of consultation (starting April 2007). The review resulted in the use of seven alternative polling places and the amendment of two polling districts.
- 4.14.3 In addition to the above formalised reviews, an ongoing review process is also operated in Lewisham. Before each election polling places are assessed for availability and applicability and reviewed again following post-election feedback. A review of specific polling stations in Lewisham is planned prior to the referendum, and a statutory review must take place before the end of 2011.

4.15 Postal Vote Refresh (by December 2012)

- 4.15.1 The EAA also requires that postal voters provide personal identifiers (signature and date of birth) and for this information to be refreshed every five years. It also requires electoral services to cross-reference the personal identifiers of 20% of the postal votes against their registration details. In Lewisham, at all elections since the requirement came into law, 100% of postal votes are checked, despite receiving funds to check only 20% of the postal votes.
- 4.15.2 A total of 23,526 electors were issued a postal vote for the May 2010 elections which included 3164 postal voters in Bromley (who fall into the Lewisham West and Penge parliamentary constituency) and the 658 who registered in the five working days leading up to the application deadline.
- 4.15.3 As at 6/5/10 there were 184,253 electors on the electoral register (based on local government electors) of which approximately 12% were registered as postal voters. At the election, 17,203 postal votes were cast. This represents approximately 16% of the total votes cast, and a 73% turnout among absent voters.

4.15.4 In Lewisham the number of overall postal voters in 2010 represented a 23.5 per cent increase from 2009⁶ and required a concentrated set of resources to distribute, replace, open and verify postal votes. The administration of this work has led to the process becoming a distinct project within itself, with the refresh also likely to be a considerable undertaking.

5 Administrative implications

5.1 In Lewisham, and other local authorities, core electoral functions include overseeing the registration and publication of the electoral register and elections management more broadly. Preparing for this activity spans across the year, and is not restricted only to election periods. For example, whilst there is an annual canvass period in order for the full electoral register to be published by the 1st December, there is the additional requirement to manage rolling registration and to publish a Notice of Alteration on a monthly basis.

5.2 Similarly, preparation for an election spans between six to nine months depending on the complexity of the election. This time reflects the extent of planning required including; printing contracts, venue booking and liaison with stakeholders as well as the recruitment and training of between 600-800 staff (plus 109 canvassers). The busy and continuous agenda set out in this report clearly means that there will need to be sufficient resources in place to manage this period of rapid and significant change.

6 Funding

6.1 Costs for UK and European Parliamentary elections and national referendums are met by the UK Government whilst local authorities fund their own elections. Despite the introduction of the EAA the funds from central government for national elections have largely remained static or reduced despite the increase in statutory electoral activity.

6.2 The MOJ (now the Cabinet Office) has introduced a 'notional cost' framework which has resulted in a national 'capping regime'. Local authorities are still entitled to what is 'reasonably and necessarily incurred' by way of election expenditure. However, where previously this operated on a claims basis for actual expenditure, it is now subject to an upper limit based on a notional unit cost. The scheme was introduced at the last European election which did not have the complexity of other elections, and where nationally there was an underspend of £9.8 million. When applied to more complicated elections, the notional cap is far more challenging. This is likely to be even more so as electoral activity grows and becomes even more complex.

⁶ based upon 17,621 electors registered for a postal vote on 1 Dec 2009.

- 6.3 There is still no clarity about the cost implications relating to the voting reform referendum to take place next year if the legislation is put in place, nor for IER where increased subsidy may be required.

7 Legal Implications

The legal implications are contained in the body of the report. Many will not be clear until the appropriate legislation is in place.

8 Conclusion

- 8.1 The Government's ambitious agenda for electoral reform, if implemented, will mean a rate of change not previously experienced. It will mean a new landscape for national and local elections, potentially with new voting systems, a busy timetable for a range of elections familiar and unfamiliar, as well as new registration requirements potentially affecting the numbers on the electoral roll in Lewisham.
- 8.2 The equalisation of the number of electors in parliamentary constituencies is likely to lead to a reduced number of MPs for London, with larger constituencies than exist now in Lewisham's three constituencies. We cannot know how this will operate in practice until the parliamentary boundary review is complete but it is likely that there will be more cross boundary issues as new parliamentary boundaries are likely to be even less co-terminous with borough boundaries than they are now.
- 8.3 This national shift may lead to an examination of local electoral arrangements, questioning for example whether proportional representation is appropriate at the local level, the number of wards and/or councillors per ward and/or Council. It may lead to pressure for a review of ward boundaries possibly through community governance reviews, or by central government initiative.
- 8.4 It is clear that electoral administration is one of the very few areas of Council business that is increasing. Since the introduction of the EAA a raft of new legislation has been introduced, with over 25 pieces of primary and secondary legislation governing the administration of the UK elections in May 2010. This trend is now likely to accelerate significantly as the electoral agenda shifts direction as set out in this report.

APPENDIX 1

Examples of First Past the Post Parliamentary ballot paper and the Alternative Vote ballot paper proposed in the Parliamentary Voting System and Constituencies Bill. Note that the instructions to the voter in both instances are compliant with the regulations as they stand at present.

Example of Ballot Papers under both systems

First Past the Post ballot paper

BALLOT PAPER FOR PARLIAMENTARY
ELECTION UNDER THE FIRST PAST THE
POST SYSTEM

VOTE FOR ONE CANDIDATE ONLY

Candidate A The A Party	[Emblem]	X
Candidate B The B Party	[Emblem]	
Candidate C The C Party	[Emblem]	
Candidate D The D Party Candidate	[Emblem]	
Candidate E Independent		
Candidate F The F Party	[Emblem]	
Candidate G The F Party	[Emblem]	
Candidate H Independent		
Candidate I The I Party Candidate	[Emblem]	

Alternative Vote ballot paper

BALLOT PAPER FOR PARLIAMENTARY
ELECTION UNDER THE ALTERNATIVE VOTE
SYSTEM

Put the number 1 next to the name of the candidate who is your first choice (or your only choice, if you want to vote for only one candidate).

You can also put the number 2 next to your second choice, 3 next to your third choice, and so on.

You can mark as few or as many choices (up to the number of candidates) as you wish.

Do not use the same number more than once.

Candidate A The A Party	[Emblem]	1
Candidate B The B Party	[Emblem]	
Candidate C The C Party	[Emblem]	3
Candidate D The D Party Candidate	[Emblem]	2
Candidate E Independent		4
Candidate F The F Party	[Emblem]	
Candidate G The F Party	[Emblem]	
Candidate H Independent		5
Candidate I The I Party Candidate	[Emblem]	

Example of a Supplementary Voting System ballot paper taken from Local Authorities (Mayoral Elections) (England and Wales) Regulations 2007

Election of Mayor

Vote ONCE [X] in Column One for your First Choice
Vote ONCE [X] in Column One for your Second Choice

			Column One (First Choice)	Column Two (Second Choice)
1	Candidate A The A Party	Emblem		
2	Candidate B The B Party	Emblem		
3	Candidate C The C Party	Emblem	X	
4	Candidate D The D Party Candidate	Emblem		
5	Candidate E Independent			
6	Candidate F The F Party	Emblem		X
7	Candidate G The G Party	Emblem		
8	Candidate H Independent			
9	Candidate I The I Party Candidate	Emblem		

APPENDIX 2

Example of the Referendum ballot paper on the Alternative Vote proposed in the Parliamentary Voting System and Constituencies Bill. Note that the instructions to the voter are compliant with the regulations as they currently stand.

Part 2

Forms referred to in referendum rules

Note - The forms contained in this Part may be adapted so far as circumstances require.

Rule 5(1) :

FORM 1 - FORM OF BALLOT PAPER

Front of ballot paper

<p>Referendum on the voting system for parliamentary elections Vote (X) once only</p>	10
<p>Do you want the United Kingdom to adopt the “alternative vote” system instead of the current “first past the post” system for electing Members of Parliament to the House of Commons?</p>	15
<p>YES</p>	
<p>NO</p>	20

APPENDIX B**LONDON BOROUGH OF LEWISHAM**

MINUTES of the meeting of the ELECTIONS COMMITTEE, which was open to the press and public, held on MONDAY, 18 OCTOBER 2010 at LEWISHAM TOWN HALL, CATFORD, SE6 4RU at 6 p.m.

Present

Councillors Owolabi-Oluyole (Chair), Bowen, Curran, Hall, Paschoud and Peake

<u>Minute No.</u>		<u>Action</u>
1.	<u>ELECTION OF CHAIR</u>	
	RESOLVED	that Councillor Owlabi-Oluyole be elected Chair and Councillor Bowen elected Vice Chair of the Committee.
2.	<u>MINUTES</u> (page	
	RESOLVED	that the Minutes of the meeting of the Committee, which was open to the press and public, held on 28 January 2010 be confirmed and signed.
3.	<u>DECLARATIONS OF INTERESTS</u> (page	
	None	
4.	<u>ELECTORAL AGENDA: THE NEXT 5 YEARS</u> (page and appendices at page	
4.1	The Head of Law presented the report to the committee. The Head of Law provided the Committee with an outline of anticipated referendums, elections, statutory reviews and relevant legislative changes over the next five years (2010 – 2015) and their impact on Lewisham's forthcoming electoral agenda.	
4.2	Councillor Hall asked whether local resources in the borough will be able to cope with the anticipated change. The Head of Law replied that Lewisham has a staffing budget for elections and for canvass. However funding for election is submitted and reimbursed from Cabinet /or GLA if it is regional. Every four years Lewisham has to pay for its local election. The Chief Executive continued that there will not be a budget reduction for this area, but that an increase was unlikely.	
4.3	Councillor Paschoud raised concern about how the Individual Electoral	

Minute
No.Action

Registration (IER) will work in practical terms in the borough and suggested that support be given to people with Learning Disabilities.

- 4.4 With regards to canvassing, Cllr Hall asked what Lewisham can further do to publicise the need for people to register. The Head of Law replied that there are a range of things on-going to ensure this.
- 4.5 Councillor Curran inquired about the role of the Election's Committee and its ability to affect decisions brought before them, specifically on how it can make a submission to the GLA on matters raised in the meeting. The Chief Executive replied that currently there is no legislation underpinning proposed electoral changes, as it is not yet a Bill. However he welcomed the possibility of making a submission to the GLA or other responsible bodies.
- 4.6 Councillor Curran asked for the definition of excessive Council tax. The Head of Law explained that it is that the Secretary of State should have powers to set any principal rises in Council tax, likely to be zero and any local authority that exceed this will have to offer a referendum, and can therefore only increase if local people agree.
- 4.7 Councillor Hall requested that the committee be kept informed on work being done on ward boundary changes by the Boundary Commission. The Chief Executive replied that all work in this area will be referred to the committee when received. The Committee suggested that even though the issues under discussion were not executive matters, the Mayor & Cabinet be informed of the implications of all changes as they could have an impact on future decision making.

RESOLVED The committee AGREED the following additional proposals:

1. election officers to do further publicity work for Canvass 2010
 2. the Committee to meet in January 2011 to review progress and to receive further update
 3. seek consultation on all future electoral changes, especially on boundary changes
 4. lobby the LEA / or the necessary department responsible for electoral changes and also lobby for practical help for people with Learning Disability on IER
5. CANVASS 2010 (Page and Appendix at page
- 5.1 The Electoral Services Manger presented the report. This report provided the Committee with a review of Lewisham's Electoral Registration processes particularly the Annual Household Registration Audit , commonly

Minute
No.Action

known as the Canvass, and reviews the steps taken to address completeness and integrity in compiling the register.

- 5.2 With regards to the number of voids, Councillor Paschoud asked whether Lewisham's figures are high in comparison to other London Borough. The Electoral Services Manager replied that the figures are comparable to that of Tower Hamlet, Southwark and Hackney. Records used are of registered residents, and this can be cross referenced only by information held by the Authority, such as council tax, the Electoral Registration Officer has ability to utilise external agencies.
- 5.3 The Chair asked what was being done between now and December to achieve last year's canvass rate of 92%. The Electoral Services Manager replied that canvass is ahead of last year's figures around the same time. 700 responses are received daily and this is likely to increase. Canvassers will knock on doors of non responding properties from the 29 October. There are daily checks in place to ensure that canvassers perform properly.

RESOLVED that the report be noted.

6 REVIEW OF THE PARLIAMENTARY, MAYORAL AND LOCAL ELECTION IN MAY 2010 (Page and Appendix at page

- 6.1 Following a request made by the Chief Executive, the Director of Programme Management & Property presented the report. This report provides the Committee with a review of the administration of the Parliamentary, Local Government and Mayoral elections, held on 6 May 2010 within the London Borough of Lewisham (LBL). The Director of Programme management and Property highlighted the long hours worked by poll clerks may have taken a toll on their performance and stated that a review of presiding officers and poll clerks is needed and a possible second shift of counting staff should be considered.
- 6.2 Councillor Paschoud praised the comprehensive analysis of the report and commended all officers involved in the May 2010 election. The Committee praised the absence of fraud during the elections.
- 6.3 Councillor Curran raised concerns with polling station signage and asked that this be improved to give clearer directions and information. He described instances where voters had been mis-directed by signage. The Head of Law asked Councillor Curran to provide details on where this is a problem so that it can be resolved. The Chief executive acknowledged the signage was outdated and he reported on suggestions he had made to the Design Council for more appropriate modern signage.
- 6.4 Councillor Paschoud raised concern on the high number of spoilt ballot in

Minute
No.

Action

the Mayoral elections and stated that from his observation it appeared that voters did not understand what was required.

- 6.5 Councillor Paschoud further stated that officers were not following instructions relating to the postal vote process whereby some teams were having difficulty in recovering ballot papers that had failed the automated Postal Vote Identifier check, resulting in delays, he suggested a possible review on how this process works.

RESOLVED

The committee **AGREED** the following additional proposals:

1. The Election Committee to oversee the council's Lobbying of central government
2. The Director of Programme Management & Property to look again at the issue of data management
3. Polling station signage to be reviewed in order to improve current status
4. Review Postal Vote opening process in relation to recovering rejected ballot papers. find ways to redress and reduce the large number of spoilt Mayoral ballot papers.

The meeting ended at 8.20p.m.

Chair

MAYOR AND CABINET		
Report Title	Management Report – November 2010	
Key Decision	No	Item No.
Ward	All	
Contributors	Executive Director for Resources	
Class	Open	Date: 19 January 2011

1 PURPOSE

- 1.1 To set out the Management Report as at November 2010.

2 EXECUTIVE SUMMARY

- 2.1 The Management Report aims to present a comprehensive account of organisational performance in achieving our ten corporate priorities.
- 2.2 The Council's ten corporate priorities identify the Council's own distinct contribution to the delivery of the six priority outcomes set out in the 'Shaping our future – Lewisham's Sustainable Community Strategy' (SCS).

3 RECOMMENDATION

- 3.1 That the Mayor notes the Management Report.

4 BACKGROUND & FINANCIAL CONTEXT

- 4.1 The Management Report indicates how well the Council is performing against a basket of 80 indicators including National and Local indicators which cross each of the Council's ten corporate priorities. The report aims to report on organisational performance by drawing together information on performance, risk, projects and finance. It is presented monthly to the Executive Management Team and quarterly to the Mayor and Cabinet.
- 4.2 The Monthly Management Report utilises exception reporting to focus attention on key areas: exception reporting for red Projects, Risk and Finance and Red and Green exception reporting for performance. By combining these four areas for each of our corporate priorities, it functions an important tool for supporting decisions across the organisation.

5 FINANCIAL IMPLICATIONS

- 5.1 There are no direct financial implications arising from the Management Report. However, the report does set out a summary of the Council's overall financial position as it stands at the start of each month.

6 LEGAL IMPLICATIONS

- 6.1 There are no direct legal implications arising from the report.

7 HUMAN RESOURCE IMPLICATIONS

- 7.1 Data on the performance of the Council's human resources function is found within the indicators contained in the Management Report, and in particular within the indicators relating to the Council's priority to "Inspire Efficiency, Effectiveness and Equity" (priority 10).

8 EQUALITIES IMPLICATIONS

- 8.1 Data on performance relating to equalities is found within the indicators contained in the Management Report. This is a theme that cuts across all priorities within the report.

9 ENVIRONMENTAL IMPLICATIONS

- 9.1 Data on performance relating to the environment is found within indicators contained throughout the Management Report, and there is a particular focus on the environment within the indicators relating to the Council's priority to make the borough "Clean Green and Liveable" (priority 3).

10 CRIME AND DISORDER IMPLICATIONS

- 10.1 Data on performance relating to crime and disorder is found within indicators contained in the Management Report, and in particular within the indicators relating to the Council's priority to achieve "Safety, Security and a Visible Presence" (priority 4).

BACKGROUND PAPERS

<u>Short Title of Document</u>	<u>Date</u>	<u>File Location</u>	<u>Contact Officer</u>
None			

For further information on this report please contact: Lucy Morton, Policy & Partnerships Unit, on 0208 314 3373.












Monthly Management Report November 2010/11

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Key

-  On track to achieve our outcomes
-  Slightly behind and requires improvement
-  Not on track but taking corrective action
-  Improving
-  No change
-  Declining
-  Missing actual data
-  Missing target
-  Missing target and actual data

Foreword

The purpose of the Management Report is to place on record each month, in a consistent format, our performance against priorities. Each month we attempt to give a full account of what is being done, what has been achieved and which areas require additional management attention to secure future achievements. The report gives some coverage to the effectiveness of our partnership working. Reporting on performance is always double edged. We have high ambitions and targets which are set to stretch management and staff effort. So, there are areas where the need for greater management attention is highlighted.

The report focuses on the Council's performance in line with our corporate priorities, drawing data from performance indicators (PIs), project monitoring information, risk register assessments and financial reports. A dashboard summary tries to present an overall picture on one page using a Red, Amber, Green rating. The overall dashboard rating for this month shows there are 10 Green ratings, 16 Amber ratings and 10 Red ratings. This month's management report (November) reports on October's performance data.

Performance: In this month's management report, there has been no change to the performance dashboard (see p4) from last month. Over half of the performance indicators are green or amber against target (57 per cent) and 36 per cent are showing an upward direction of travel. Just over a third of performance indicators are red against target, half (50 per cent) are red against direction of travel and 25 per cent are red against external benchmark.




Projects: This month there has been no change to the projects dashboard. Priority 4, Safety, Security & Visible presence and Priority 7, Protection of Children continue to have no projects. There are three red project ratings this month. There are two Red rated projects (one less than last month), these are: Building Schools for the Future and Kender New Build (grant phase 3 south). This month, Playbuilders has been downgraded from Amber to Green, Street Lighting PFI has been downgraded from Amber to Green, V-Volunteering has been downgraded from Amber to Green, My Place has been escalated from Green to Amber and Parklands has been escalated from Green to Amber. There is one removal this month which is Worksmart and no new additions.

Risks: The dashboard for risk remains unchanged this month. There are 5 red corporate risks this month- Avoidable death or serious injury to a child/adult client, Litigation risks, Financial Failure & Fraud/Loss - Inability to maintain a balanced budget, Failure of Central ICT infrastructure and Data Integrity/Non Compliance. This leads to a red dashboard rating for risk for Priority 2, Young People's Achievement and Involvement, Priority 7, Protection of Children, Priority 8, Caring for Adults and Older People and Priority 10, Inspiring Efficiency, Effectiveness and Equity. There is no change to the directorate risk register.

Finance: The latest budget monitoring information for 2009/10 shows that the Council is now projecting a General Fund year-end underspend of £1.829 million against a net budget of £271.454m. Seven of the ten priorities are projecting an underspend this month. There have been two changes to the finance dashboard: Priority 10, Inspiring Efficiency, Effectiveness and Equity has changed from Red to Amber (underspend) and Priority 3, Clean, Green and Liveable has changed from Amber to Red. There are also red finance ratings for two other priorities: (underspend) for Priority 2, Young People's Achievement and Involvement and (overspend) for Priority 7, Protection of Children.

*Barry Quirk, Chief Executive
7 December 2010*

Dashboard Summary

-  On track to achieve our outcomes
-  Slightly behind and requires improvement
-  Not on Track but taking corrective action

01. Community Leadership & Empowerment Performance n/a	02. Young People's Achievement & Involvement Performance n/a	03. Clean, Green and Liveable Performance n/a	04. Safety, Security & a Visible Presence Performance n/a	05. Strengthening the Local Economy Performance n/a
Projects n/a	Projects n/a	Projects n/a	Projects n/a	Projects n/a
Risk n/a	Risk n/a	Risk n/a	Risk n/a	Risk n/a
Finance n/a	Finance n/a	Finance n/a	Finance n/a	Finance n/a




06. Decent Homes for All Performance n/a	07. Protection of Children Performance n/a	08. Caring for Adults and Older People Performance n/a	09. Active, Healthy Citizens Performance n/a	10. Inspiring Efficiency, Effectiveness, and Equity Performance n/a
Projects n/a	Projects n/a	Projects n/a	Projects n/a	Projects n/a
Risk n/a	Risk n/a	Risk n/a	Risk n/a	Risk n/a
Finance n/a	Finance n/a	Finance n/a	Finance n/a	Finance n/a

Overall Summary: Performance

Summary of performance indicators in this report.




This month, the report contains a basket of 80 performance indicators, both monthly and quarterly indicators and local indicators and these form part of our Local Area Agreement. Priorities 5, 6, 7, 8 and 9 contain a list of volume or contextual indicators i.e total number of services users or job-seeker allowance claimants etc.

Performance against target

	09/10	%	Sep 10	%	Oct 10	%
	39	46	32	40	30	38
	12	13	16	20	15	19
	28	35	29	36	28	35
Missing data	5	6	3	4	7	9
Total	84	100	80	100	80	100




For October 57% (45) indicators are reported as Green or Amber against target. This is down from 60% (48) last month and 59% (47) in August. However, data is missing for three more indicators than was the case last month.

Direction of travel

	09/10	%	Sep 10	%	Oct 10	%
	36	43	30	38	29	36
	2	2	3	4	6	3
	32	39	43	54	40	50
Missing data	14	16	4	5	2	11
Total	84	100	80	100	80	100

The basket of indicators show 36% of indicators are reporting an upward trend in September. There are 50% of indicators with a red direction of travel. Also, 11% of data is missing. N.B. direction of travel is the change in performance and is measured against the previous year. Therefore, changes to targets from one year to the next will affect this.

External benchmark

	09/10	%	Sep 10	%	Oct 10	%
	14	17	17	21	17	21
	8	10	9	11	9	11
	24	28	21	26	20	25
Missing data	38	45	33	41	34	43
Total	84	100	80	100	80	100

The basket of indicators shows 32% of indicators exceed or are within 5% of the top quartile comparator for all of England. 25% of indicators are more than 5% below this top quartile, and are therefore red. For a further 43%, external benchmark data is currently being sought. N.B. Baseline data is not yet available for some NIs. Local indicators specific to Lewisham do not have a comparator group.

Areas for Management Attention

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

Areas requiring management attention this month									
Performance Indicators - Monthly indicators									
	Against Target Oct 10	External Benchmark	DoT Oct 10 v Mar 10	DoT Oct 10 v Sep 10	Priority No.	Page No.			
+	▲	▲	▲	▲	3	p31			
+	▲	!	▲	▲	4	p36			
+	★	▲	▲	▲	5	p39			
+	▲	▲	▲	▲	7	p49			
+	▲	▲	▲	▲	7	p50			
+	▲	▲	▲	▲	7	p51			
+	▲	▲	▲	▲	7	p52			
+	▲	★	▲	▲	7	p53			
+	★	▲	▲	▲	8	p59			
+	▲	▲	▲	▲	8	p60			
+	▲	▲	▲	▲	8	p61			
+	▲	▲	▲	▲	8	p62			
+	▲	▲	▲	▲	8	p63			
+	●	▲	▲	▲	9	p69			
+	●	▲	▲	▲	10	p75			
+	▲	!	▲	▲	10	p77			
+	▲	!	▲	▲	10	p78			
Performance Indicators - Monthly Indicators									
	Against Target Sep 10	External Benchmark	DoT Sep 10 v Mar 10	DoT Sep 10 v Aug 10	Priority No.	Page No.			
+	▲	!	▲	▲	10	p76			

Areas for Management Attention

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Areas Requiring Management Attention this Month

Performance Indicators - Monthly Indicators

	Against Target Sep 10	External Benchmark	DoT Sep 10 v Mar 10	DoT Sep 10 v Aug 10	Priority No.	Page No.
NI191 Residual household waste per household (KG)	▲	▲	▲	▲	3	p28
NI192 Percentage of household waste sent for reuse, recycling and composting	▲	▲	▲	▲	3	p29
NI193 Percentage of municipal waste land filled	▲	▲	▲	▲	3	p30

Areas of Good Performance

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Areas of Good Performance						
Performance Indicators - Monthly indicators						
	Against Target Oct 10	External Benchmark	Direction of Travel Oct 10 v Mar 10	Direction of Travel Oct 10 v Sep 10	Priority No.	
CF/C63 Participation of LAC in reviews	★	!	✓	✓	2	
LPI079 Percentage of fly tip removal jobs completed within 1 day	★	!	✓	✓	3	
LPI752 Percentage of graffiti removal jobs completed in 1 day	★	★	✓	✓	3	
NI015 Serious violent crime rate	★	!	✓	✓	4	
NI029 Gun crime rate	★	!	✓	✓	4	
NI057b % Minor planning apps within 8 weeks	★	★	✓	✓	5	
BV204 % Planning appeals allowed	★	!	✓	✓	5	
LR1037 Average Time to Re-let	★	!	✓	✓	6	
NI059 Percentage of Initial assessments for children's social care carried out < 7 working days	★	★	✓	✓	7	
NI065 Children becoming the subject of a Child Protection Plan for a second or subsequent time	★	★	✓	✓	7	
NI131 Delayed transfers of care	★	★	✓	✓	8	
NI136 People supported to live independently through social services (all adults)	★	★	✓	✓	8	
NI052 Take up of school lunches	▲	★	✓	✓	9	
BV016a Disabled employees	▲	★	✓	✓	10	
LPI031 NNDR collected	★	★	✓	✓	10	
NI181 Time taken to process Housing Benefit/Council Tax Benefit new claims and change events	★	★	✓	✓	10	

Areas of Good Performance

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Areas of Good Performance	

Performance Indicators - Quarterly Indicators						
	Against Target Jun 10	External Benchmark	Direction of Travel Jun 10 v Mar 10	Direction of Travel Jun 10 v Mar 10	Priority No.	
NI141 Percentage of vulnerable people achieving independent living					8	
NI053 Prevalence of breastfeeding at 6 - 8 weeks from birth					9	

Overall Summary: Projects and Programmes

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Projects Forward Plan

Projects are reviewed monthly and Portfolio Directorate Forward Plan Reports set out the progress made to date. Project progress for November is set out below:

Major Projects Forward Plan - Management Report - Events November 2010			
Project Name	Senior Responsible Officer	Comment	
PRENDERGAST VALE COLLEGE	CYP ED	Financial Close	
LEWISHAM BRIDGE PRIMARY SCHOOL	CYP ED	School decant to Mornington Centre (New Cross)	
ADDEY & STANHOPE	CYP ED	M & C Contracts Design Stage 2	
NEW ASD SCHOOL AT PENDRAGON SITE	CYP ED	Financial Close	
BENJUS PASTOR	CYP ED	Financial Close	
SPIN REVIEW - ATHELNEY ASD SCHOOL	CYP ED	Official opening	
LOCAL ASSEMBLY PROGRAMME	Community Services ED	Completion of report on Social Return on Investment pilot for Mayor's Fund. Launch Assembly 'Spice' Community Credit Scheme	
NORTH LEWISHAM LINKS - (Pedestrian & cycle routes linking town centres) - FORDHAM PARK	Regeneration ED	Works complete	
NORTH LEWISHAM LINKS - (Pedestrian & cycle routes linking town centres) - NEW CROSS UNDERPASS	Regeneration ED	Works complete	
CATFORD TOWN CENTRE	Regeneration ED	M&C - Update and Next Steps	
PREPARATION OF LIP 2 (FORMS PART OF THE COUNCIL'S CORE STRATEGY).	Regeneration ED	Consultation on draft LIP2 (Dec - Feb)	
CLIMATE CHANGE STRATEGY	Resources ED	Response to the Sustainable Development Select C'ttee	
ANNUAL CANVAS	Resources ED	Publish register	
AUDIT CONTRACT RE-LET	Resources ED	Tenders evaluation	
HEATHSIDE & LETHBRIDGE	Customer Services ED	Public consultation on S105 (changing programme phasing)	

Overall Summary: Projects and Programmes

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Corporate Programmes

The status of the Council's Corporate Programmes in October are set out below. The Council's Corporate Programmes are made up of a number of individual projects. For further details of the red programmes see priority two: Young People's Achievement and Involvement.

Corporate Programmes	Current Status
PMSPROG Building Schools for the Future	▲
PMSPROG Primary Places Programme	●
PMSPROG Information Management & Technology programme	●
PMSPROG Worksmart programme	★
PMSPROG The Future of Deptford Town Centre Programme	★
PMSPROG Adult Social Care and Health Programmes	★
PMSPROG Customer Services Transformation Programmes	★




Overall Summary: Projects and Programmes

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

Major Projects & Programmes

Projects are reviewed monthly by Directorate Project Review Groups and quarterly by the Corporate Project Board. A summary of all the Programmes and Projects, with a value of £500k and over that have a red RAG rating, are detailed in the table at the bottom of this page.

Project Performance - November 2010

	09/10	%	Oct 10	%	Nov 10	%
	37	73	33	70	26	60
	12	23	11	23	15	35
	2	4	3	7	2	5
Total	51	100	47	100	43	100

Red Projects - November 2010

Red Projects	Project Summary	Page No.	Corporate Priority No.
Building Schools for the Future	This remains a very complex programme with uncertainties & a high potential for change, delay & cost increases. There remain listing and design issues, decant challenges & an ongoing need to provide good quality designs within a constrained budget. Now additional pressure from Central Government on the Programme, with an expectation of further savings on construction costs.	25	2
Kender New-Build Phase 3 South (NDC Centre)	The NDC Centre is the flagship capital project in the New Cross gate NDC Programme. The consented scheme does not now appear to be viable and officers are considering options for the site.	47	6

Overall Summary: Projects and Programmes

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

Major Projects & Programmes

MOVEMENTS IN STATUS SINCE THE OCTOBER MANAGEMENT REPORT UPDATE

Removals: Worksmart: project complete

Additions: None

Changes in RAG status:

My Place	escalated from Green to Amber
Parklands	escalated from Green to Amber
Street Lighting PFI	downgraded from Red to Amber
V-Volunteering	downgraded from Amber to Green
Playbuilders	downgraded from Amber to Green

TEXT FOR PROJECTS ESCALATED FROM GREEN TO AMBER

My Place

It was expected that the Government would confirm, in the weeks following the Corporate Spending Review in October, whether the Myplace programme would be continued. Despite initial statements indicating that capital projects will not be affected by cuts, the Council has still not received confirmation that funding will be forthcoming. Big Lottery are unable to provide any further information and are unsure when more will be known. As a result of this uncertainty, the RAG status of the project has been escalated to Amber.

Parklands

The water main on the Ladywell Fields site is not in the position expected and is causing a significant design issue. Some of the concrete due to be removed from the river bed and banks is now likely to have to remain. This will require some redesign work and permissions will need to be obtained from Thames Water and the Environment Agency.

Overall Performance: Risk

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Risk is reported to the Internal Control Board quarterly with monthly updates where there are material changes

Directorate Risk Performance November 2010

Current Status	Community Services	%	Customer Services	%	CYP	%	Resources	%	Regeneration	%
★	3	18	8	47	4	18	7	39	10	56
●	13	76	8	47	14	64	7	39	8	44
▲	1	6	1	6	4	18	4	22	0	0
Total	17	100	17	100	22	100	18	100	18	100

The main method for evaluating, reporting and monitoring risk continues to be by risk registers, utilising standardised risk descriptors, scores and targets which are presented to the Risk Management Working Party and Internal Control Board on a quarterly basis.

Historically, the risk registers have been produced at both a Corporate and a Directorate level. The Corporate Risk Register identifies risks that are likely to have an impact on the Council overall. The Directorate level risk registers have specific and cross-cutting significant risks. The Corporate level register is informed by the Directorate registers, and further details of the risks rated red in the Corporate Risk Register are contained under each priority.

An Internal Audit report on operational risk registers has now completed and the final report with limited assurance has been issued. An action plan to deliver the recommended improvements has been agreed and will be delivered over the year ahead. The recommendations of the Audit are being incorporated into the review of the Risk Management Strategy which is currently underway with a view to issuing an updated Strategy early in 2011.

Corporate Risk Performance

Status	Oct 10	%	Nov 10	%
★	2	12	0	0
●	10	59	10	67
▲	5	29	5	33
Total	17	100	15	100

Overall Performance: Risk

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The table below shows the risks rated red in the Corporate Risk Register.

Litigation risk was escalated to a red risk earlier in the year primarily due to the risk of litigation arising from historic events. The position is constantly monitored.

The level of savings required over the next 3 years will take considerable leadership focus to deliver. Managing the organisational changes required to achieve those savings whilst continuing a strong emphasis on achieving in year targets will be challenging.

Regular and ongoing management action and review continues in respect of safeguarding. However, the risk of avoidable death or serious injury to client or employee will continually be rated red due to the potential severity should an event occur.

The completion of archiving of storage combined with change support for moves to Sharepoint to alleviate storage pressures, has slipped to the end of March 2011. The ICT risk will continue to be rated red pending completion.

A review of end to end process of securing data is in progress. Risk management reporting and management arrangements and processes have been developed and are due to be rolled out across the Council in December 2010.

Corporate view - Red Risks		
Corporate Priority		Current Status (RAG) on matrix
10	02 Failure of Central ICT infrastructure	▲
10	05 Litigation Risks	▲
10	06 Financial Failure & Fraud/Loss - Inability to maintain a balanced budget	▲
7, 8	18 Avoidable death or serious injury to client or employee	▲
10	21 Data Integrity/Non Compliance	▲

Overall Performance: Risk

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

	5	10	15	20	25
Likelihood	4	8	12	16	20
	3	6	9	12	15
	2	4	6	8	10
	1	2	3	4	5
					Impact

Risks are scored in terms of likelihood and impact with a range from 1 to 5 (with 1 being the lowest and 5 the highest) and the result is plotted on a matrix (as shown) to produce the RAG rating.

The table below shows the risks from the Directorate risk registers where the current evaluation of the risk is red on the matrix i.e. between 15 and 25 and this evaluation means that it is also red against the target set.

The risk registers contain action plans to manage these risks to the target and these are subject to regular review by Directorate management Teams, Risk Management Working party and the Internal Control Board and will not be routinely replicated in this report, unless there has been a significant change that should be specifically flagged up.

Areas for management attention from the directorate risk registers are shown in the table below. These are identified from the directorate risk register where the 'Current status on the risk matrix' is red and at the same time they also have a red for 'current status v target'.

Risks where the current status is red on the risk matrix that are also red against target						
	Current RAG status on risk matrix	Current Status score	Target score	Current Status v Target		
+	RMSCYP09 Asset and Premises management	▲	16	6	▲	
+	RMSCYP13 Litigation risks	▲	16	8	▲	
+	RMSCYP21 School Places	▲	20	4	▲	
+	RMSRES04 Unforeseen expenditure (Inadequate provision for insurable risk)	▲	15	4	▲	
+	RMSRES08 Employee relations	▲	20	4	▲	
+	RMSRES11 Failure to achieve Business Efficiencies	▲	15	2	▲	

Overall Performance: Finance

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Performance

	Oct 10	%	Nov 10	%
★	2	20	2	20
●	5	50	5	50
▲	3	30	3	30
Total	10	100	10	100

The latest revenue monitoring is forecasting a General Fund year end underspend of £1.829m against a net budget of £271.454m.

Finance by Priorities (£000s)				
	2010/11 Budget	Latest projected year end variance as at Nov 10	2010/11 projected variance	
01. NI Community Leadership and Empowerment	1,583	0	0.00	
02. NI Young People's Achievement and Involvement	20,459	-1,701	-8.31	
03. NI Clean, Green and Liveable	36,852	-563	-1.53	
04. NI Safety, Security and Visible Presence	6,654	-118	-1.77	
05. NI Strengthening the Local Economy	12,368	-146	-1.18	
06. NI Decent Homes for All	107,573	-89	-0.08	
07. NI Protection of Children	44,661	873	1.95	
08. NI Caring for Adults and Older People	77,696	475	0.61	
09. NI Active, Healthy Citizens	19,942	-357	-1.79	
10. NI Inspiring Efficiency, Effectiveness, and Equity	41,666	-203	-0.49	
CEX NI Corporate Priorities	369,454	-1,829	-0.50	

Overall Performance: Finance

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

Council wide Directorate Expenditure Panels (DEPs) are in place to help ensure that spend does not exceed budget by the year end.

The mid year projected revenue outturn was submitted to Public Accounts Committee and Mayor & Cabinet on 9th and 17th November 2010 respectively.

The current forecast on the Housing Revenue Account (HRA) is for spend to be contained within budget by year-end.

Priority 01: Community Leadership & Empowerment

Hot Topics

Our Lewisham, Our Say

The "Our Lewisham Our Say" public dialogue on the Council's budget closed on 25 October. It ran for more than three months and gathered the views of more than 2,500 residents about their priorities for Council services, as well as what they might do more of, or pay more for, if the Council has less money to spend.

The headline results have been collated and were presented alongside the budget savings documentation at the November 17 meeting of Mayor and Cabinet. A range of feedback mechanisms have been developed so that residents are able to see the outcome of the consultation and how the results have been used to inform decision making.

Blackheath Fireworks

An estimated 100,000 people attended South London's biggest and best public firework display on Saturday 6 November.

Lewisham Council launched an appeal for public donations on 14 September and, including the cash collected on the night, it is estimated that at least £25,000 has been raised so far and donations continue to come in. Members of the local community generously donated their time and skills and the display was also backed by independent fund management company GLC Ltd, who have been involved with the Blackheath Fireworks display since 1994.

Priority 01: Summary

Performance Indicators

Against Target	Direction of Travel
n/a	n/a

Projects

Current Status Nov 10	Direction of Travel Nov 10 v Oct 10
🟡	➔

Finance

Variance Nov 10	Direction of Travel Nov 10 v Oct 10
★	➔

Risk

Current Status Nov 10	Direction of Travel Nov 10 v Oct 10
★	➔

Areas Requiring Management Attention this Month

Performance Indicators

A number of proposals for performance indicators are being considered by the Corporate Performance Management Group for inclusion in this report during the next financial year.

1. Community Leadership and Empowerment

Developing opportunities for the active participation and engagement of people in the life of the community

1.2 Projects

Priority 01 Projects				
	Directorate	Budget	Est. completion date	Current Status
PMSRGN New Deal for Communities NXG	Regeneration	£4.5m (Yrs 9 & 10)	Mar 2011	

Priority 02: Young People's Achievement and Involvement

Hot Topics

Teenage Pregnancy

The teenage conception rate in Lewisham has been amongst the highest in the country since 1998 and has featured in the top 3 in London consistently between 2005 and 2008. Locally, we have a new early intervention approach to preventing conceptions in young people.

The approach uses robust data analysis to identify those most at risk. After a referral process the cohort are provided with key workers who offer intensive support which lasts (on average) 6-months.

Recent data shows Lewisham's teenage conception figures are still very high but with a reducing quarterly rate (Q3 2009) and a consistent downward trend since January 2008.

Lewisham's reduction this quarter is ranked as 19th best in the country with a 28% reduction against our 1998 figures. However we remain the 4th highest in London.

Emerging evidence for University Hospital Lewisham suggests there have been fewer births to teenagers in 2010.

Priority 02: Summary	
Performance Indicators	
Against Target Sep 10	Direction of Travel Sep 10 v Aug 10
Current Status Oct 10	Direction of Travel Oct 10 v Sep 10
Projects	
Current Status Oct 10	Direction of Travel Oct 10 v Sep 10

Finance	
Variance Oct 10	Direction of Travel Oct 10 v Sep 10
Current Status Oct 10	Direction of Travel Oct 10 v Sep 10

Areas Requiring Management Attention this Month

Performance Indicators - Quarterly			
Against Target	External Benchmark	Direction of Travel Oct 10 v Mar 10	Direction of Travel Oct 10 v Sep 10
NI045 Young offenders engagement in suitable education, employment or training			

Finance - Net Expenditure - Reds (£000s)		
02. NI Young People's Achievement and Involvement	% Variance	Variance
	-8.31	-1,701.00

Red Projects	
PMSCYP Building Schools for the Future	Current Status
	Directorate CYP

2. Young People's Achievement and Involvement

Raising educational attainment and improving facilities for young people through partnership working

2.1 Performance

Priority 2 - Monthly Indicators										
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10	
CF/C63 Participation of LAC in reviews	Number	95.10	93.00	★	!	➡	★	🟡	🟡	
NI103a Special Educational Needs - statements issued within 26 weeks excluding exceptions	Percentage	95.50	100.00	🟡	🟡	➡	🔴	🔴	★	
NI103b Special Educational Needs - statements issued within 26 weeks	Percentage	95.50	100.00	🟡	🟡	➡	🔴	🔴	★	
NI109 Delivery of Sure Start Children's Centres	Percentage	100.00	100.00	★	!	➡	★	★	★	
Priority 2 - Quarterly Indicators										
Unit	YTD Sep 10	Target Sep 10	Against Target Sep 10	DoT Last year	Against External Benchmark (Top band)	DoT Last quarter	Against Target Jun 10	Against Target Mar 10	09/10	
NI045 Young offenders engagement in suitable education, employment or training	Percentage	79.85	90.00	🔴	🟡	🔴	🔴	🔴	🔴	
NI046 Young offenders access to suitable accommodation	Percentage	98.82	95.00	★	🟡	➡	★	★	★	

2. Young People's Achievement and Involvement

Raising educational attainment and improving facilities for young people through partnership working

2.1 Performance

Priority 2 - Indicators reported every second month											
	Unit	YTD Aug 10	Target Aug 10	Against Target Aug 10	DoT Last Year	Against Benchmark (Top band)	DoT Aug 10 vs Jun 10	Against Target Jun 10	Against Target Apr 10	SchY 07/08	
BV045.12 % Half days missed - Secondary	Percentage	6.58	6.20	🟡	🔴	⚠️	🔴	🟡	🟡	🟡	
BV046.12 % Half days missed - Primary	Percentage	5.12	4.65	🔴	🟢	⚠️	🔴	🟡	🟡	🟡	

2. Young People's Achievement and Involvement

Raising educational attainment and improving facilities for young people through partnership working

2.2 Projects

Priority 02 projects					
	Directorate	Budget	Est. completion date	Current Status	
PMSCYP Building Schools for the Future	CYP	£223m	Dec 2013	▲	
PMSCYP Play Builders	CYP	£1.2m	Mar 2011	★	
PMSCYP Big Lottery for Play	CYP	£779k	Mar 2011	●	
PMSCYP Primary Places Programme	CYP	£26m	Aug 2012	●	
PMSCYP Strengthening SEN Provision	CYP	TBC	2015	●	
PMSCYP Lewisham v-Talent Year-Volunteering	CYP	£400K	Mar 2011	★	
PMSCYP Schools Minor Works Prog.	CYP	£4.6m	Sep 2011	★	
PMSCYP Children's Centres Phase 3	CYP	£999k	Mar 2011	★	
PMSCYP Tidemill School Deptf. TC Prog.	CYP	£11m	Sep 2011	★	
PMSCYP My Place Syd.Wells Pk (In Dev.)	CYP	£3.5m	TBC	●	
PMSCYP Aiming High	CYP	£673k	Apr 2011	★	

2. Young People's Achievement and Involvement

Raising educational attainment and improving facilities for young people through partnership working

2.2 Projects

	Senior Responsible Officer	Project Aim	Current status
PMSCYP Building Schools for the Future	Executive Director for Regeneration	Rebuilding and refurbishment of secondary school estate and commissioning of New School.	▲
<p>All New Project Instructions except Brent Knoll have been issued to the LEP. Listing & design issues remain a challenge, as does controlling decant costs & the need to provide quality designs within a constrained budget. Listing of the Lewisham Bridge School building will have a negative impact on cost and timescales of the Prendergast Vale project. The Strategic Business Case for the Programme is under review and priorities for use of remaining resources are being reassessed.</p> <p>There is now additional pressure from Central Government on the Programme, with expectations of further savings on construction costs. It is expected that schemes that are not yet close to financial close will come under further scrutiny (Abbey Manor, Crossways & Sydenham) and those schemes that have not reached Stage 0 approval are likely to be at particular risk (Brent Knoll).</p> <p>Haberdashers' Temple Grove: No resolution yet to the insurance claim issue, following the serious fire at the school. Site still closed and project on hold.</p> <p>Prendergast Vale College: Re-designed scheme incorporating the listed building approved by Planning Committee 9 Sept and Stage 2 proposals approved by M&C on 18 Nov. Due to reach contract signature (joint contract with B. Pastor & new ASD school) on 10 Dec 2010. Mornington Centre reserved for Lewisham Bridge school use in Jan 2011. New school facility planned to open Sept 2012.</p> <p>Sedgill: Landscaping and planting complete, landscaped areas due to re-open Jan 2011.</p> <p>Catford: Works for providing heating to reception lobby area completed.</p> <p>Norfolk: Construction is progressing well, on track for new school to open in Jan 2011.</p> <p>Derford Green: Demolition complete & piling underway. On programme for service availability date of 3 Sept 2012.</p> <p>Prendergast Hilly Fields: Planning application approved by Planning Committee on 2 Sept 2010 & Stage 2 proposals approved by M&C on 18 Nov. Contract close anticipated Dec 2010. Development progressing well.</p> <p>Sydenham: Secretary of State has decided not to list the Basil Spence building, but delivering school aspirations will still be a challenge, particularly with central government expectations of further savings.</p> <p>Adley & Stanhope: Planning approval given under delegated powers on the 19 Aug 2010 & Stage 2 proposals due to be considered by M&C on 21 Dec.</p> <p>Bonus Pastor: Planning application approved by Planning Committee on 2 Sept 2010 and Stage 2 proposals approved by M&C on 18 Nov. Due to reach contract signature 10 Dec 2010. Development progressing well.</p> <p>Pendragon (New ASD School): Planning application approved by Planning Committee on 2 Sept 2010 and Stage 2 proposals approved by M&C on 18 Nov. Contract close anticipated Dec 2010. Currently on target for opening by Easter 2013.</p> <p>Brent Knoll Complex Needs School: Project on hold pending a decision on the options available for a future scheme. Project is at risk from outcome of Comprehensive Spending Review (CSR).</p> <p>Abbey Manor College: Relatively small extension scheme. Concept design work has commenced with the school.</p> <p>Crossways: Relatively small extension scheme at early stage of development. This and Abbey Manor scheme also at risk from outcome of the CSR.</p>			

2. Young People's Achievement and Involvement

Raising educational attainment and improving facilities for young people through partnership working

2.4 Finance

Net Expenditure Priority 02 (£000s)					
	2009/10 Budget	Projected year-end as at Nov 10	Variance	% variance	Comments
02. NI Young People's Achievement and Involvement	20,459	-1,701	▲	-8.31	Finance Underspend The use of available grant funding in the delivery of services will create underspends within the following Division; Access and Support £1.076m, and Standards and Achievement £375k. An additional underspend of £250k is projected in the Resources Division, due to maintaining vacancies and the application of contingency funds to meet Directorate pressures.

Priority 03: Clean, Green and Liveable

Hot Topics

Beckenham Place Mansion and Park management

Reports have been to Mayor and Cabinet outlining a process to secure the future use of Beckenham Place Mansion and the procurement strategy for the management contract for the Park. Subsequently expressions of interest were invited for a long-term contract that will attract significant investment for the park. A report providing an update went to Mayor and Cabinet on 14 July 2010. There has been some delay in the process due to legal requirements but it is anticipated that the Invitation To Tender will be sent out by mid December 2010, with the commencement date for the new contract expected in September 2011.

Priority 03: Summary	
Performance Indicators	
Against Target Oct 10	Direction of Travel Oct 10 v Sep 10
Projects	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

Finance	
Variance Nov 10	Direction of Travel Nov 10 v Oct 10
Risk	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

Areas Requiring Management Attention this Month

Performance Indicators			
	Against Target	External Benchmark	Direction of Travel
NI191 Residual household waste per household (KG)			Direction of Travel Sep 10 v Aug 10
NI192 Percentage of household waste sent for reuse, recycling and composting			
NI193 Percentage of municipal waste land filled			

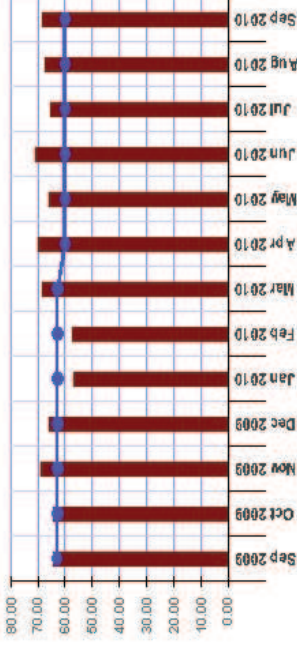
Performance Indicators			
	Against Target	External Benchmark	Direction of Travel
BV215a.05 Rectify Street Lights-non-DNO			Direction of Travel Oct 10 v Sep 10

Finance	
	% variance
03. NI Clean, Green and Liveable	-1.53
	variance
	-563.00

NI191 - Residual household waste per household

NI191 Residual household waste per household (KG)

	Kg/Household		Performance
	Actual	Target	
Sep 09	64.38	62.84	🟡
Oct 09	64.30	62.83	🟡
Nov 09	68.97	62.82	🔴
Dec 09	65.55	62.83	🟡
Jan 10	56.94	62.83	🟢
Feb 10	57.02	62.83	🟢
Mar 10	68.12	62.83	🔴
Apr 10	69.64	60.00	🔴
May 10	65.71	60.00	🔴
Jun 10	70.58	60.00	🔴
Jul 10	65.27	60.00	🔴
Aug 10	67.14	60.00	🔴
Sep 10	68.39	60.00	🔴



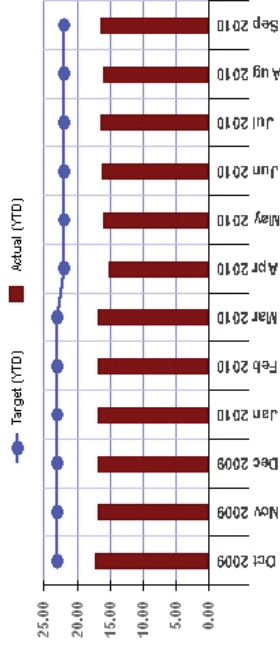
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NI191 - comment

Responsible Officer	Performance Comments	Action Plan Comments
Head of Environment	<p>Performance This indicator measures the amount of residual waste collected throughout the year per household. The service fell below target during September achieving 68.39kg per household for the year to date.</p>	<p>Performance Action Plan</p> <ul style="list-style-type: none"> The service is offering reduced prices for compost bins and provides composting workshops to help encourage residents to home compost. Visits will be made to a number of sites with an educational trailer to promote 're-use', real nappies and composting. Starve Your Bin campaign publicised on trucks . Canvassers (door-knockers) are visiting households across the borough. Waste Initiatives and Prevention Officers are in place to take forward these initiatives. Free mattress recycling service. Negotiating the introduction of Re-use Bulky Refuse Service. Ongoing campaigns include Real Nappies, Clean & Green Schools, My Street, My Place, My Planet and talks with community groups. Love Food, Hate Waste campaign to residents soon to be launched in schools. Battery recycling in libraries soon to be extended to schools and kerbside properties. Street Litter Recycling introduced to all main routes and most residential areas.

NI192 - Percentage of household waste sent for reuse, recycling and composting

+ NI192 Percentage of household waste sent for reuse, recycling and composting Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Sep 09	17.50	23.00	▲
Oct 09	17.25	23.00	▲
Nov 09	16.84	23.00	▲
Dec 09	16.84	23.00	▲
Jan 10	16.89	23.00	▲
Feb 10	16.90	23.00	▲
Mar 10	16.85	23.00	▲
Apr 10	15.27	22.00	▲
May 10	16.04	22.00	▲
Jun 10	16.17	22.00	▲
Jul 10	16.38	22.00	▲
Aug 10	16.07	22.00	▲
Sep 10	16.39	22.00	▲

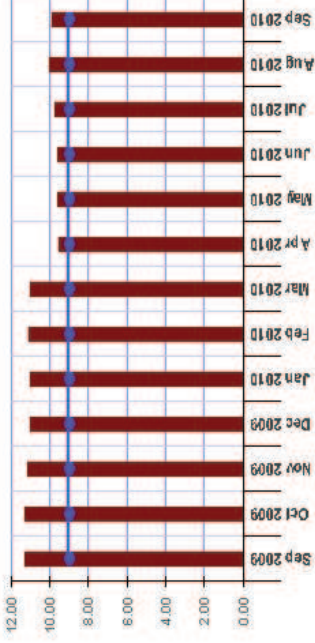


NI192 - comment		
Responsible Officer	Performance Comments	Action Plan Comments
Head of Environment	<p>Performance The service increased recycling during September, achieving 17.95%, but still fell below the annual target of 22%. Year to date the service has recycled 16.39 % of household waste</p>	<p>Performance Action Plan The service has a number of initiatives being introduced or in place to help achieve the recycling target in 2010/11:</p> <ul style="list-style-type: none"> • The service offers free or reduced prices for compost bins and provides composting workshops. • Visits made to a number of sites with educational trailer to promote 're-use', real nappies and composting. • Re-issue service standards to all households. • Canvassers (door-knockers) are visiting households across the borough. • Negotiating the introduction of Bulky Reuse Service. • Campaigns include Real Nappies, Clean & Green Schools, My Street, My Place, My Planet, talks with local groups. • Waste Initiatives and Prevention Officers are in place to take forward these initiatives. • Bin sticker and letter distributed to all households to aid recycling and reduce levels of contamination. • Crew training has increased recycling and reduced contamination - checklists/bin hangers used. • Conversion of 240L bins to recycling bins thus increasing the number of houses with larger recycling bins • Battery Recycling in libraries, soon to be extended to schools and kerbside properties. • Four Satellite Garden Waste sites were introduced in March .

NI193 - Percentage of municipal waste landfilled

NI193 Percentage of municipal waste land filled

	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Sep 09	11.29	9.00	▲
Oct 09	11.27	9.00	▲
Nov 09	11.13	9.00	▲
Dec 09	11.02	9.00	▲
Jan 10	11.03	9.00	▲
Feb 10	11.08	9.00	▲
Mar 10	10.97	9.00	▲
Apr 10	9.52	9.00	▲
May 10	9.62	9.00	▲
Jun 10	9.56	9.00	▲
Jul 10	9.71	9.00	▲
Aug 10	10.00	9.00	▲
Sep 10	9.89	9.00	▲

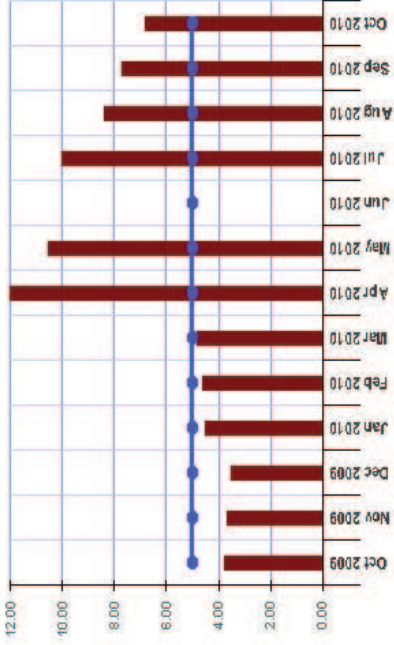


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NI193 - comment		
Responsible Officer	Performance Comments	Action Plan Comments
Head of Environment	<p>Performance This indicator measures the amount of municipal waste that goes to landfill. The service achieved 9.89% just below the annual target of 9%</p>	<p>Performance Action Plan A number of initiatives are in the process of being introduced or have recently been implemented which should help reduce the tonnage of waste being produced and going to landfill:</p> <ul style="list-style-type: none"> • Negotiating a service level agreement with the third sector to offer a Bulky Re-use Service. • Stakeholder fly tipping action plan developed to reduce levels of fly tipping. • Targets for waste reduction to be set with Lewisham Homes to reduce bulky waste production

BV215a.05 Rectify Street Lights-non-Distribution Network Operator (Number of Days)

+ BV215a.05 Rectify Street Lights-non-DNO			
Number			
Actual (YTD)	Target (YTD)	Performance (YTD)	
Oct 2009	3.75	5.00	★
Nov 2009	3.64	5.00	★
Dec 2009	3.52	5.00	★
Jan 2010	4.51	5.00	★
Feb 2010	4.59	5.00	★
Mar 2010	4.81	5.00	★
Apr 2010	11.99	5.00	▲
May 2010	10.53	5.00	▲
Jun 2010		5.00	?
Jul 2010	10.01	5.00	▲
Aug 2010	8.40	5.00	▲
Sep 2010	7.73	5.00	▲
Oct 2010	6.79	5.00	▲



NI130 - comment	
Responsible Officer	Performance Comments
Head of Transport	<p>Performance Repair times have improved overall but the affects of not successfully reaching the target in earlier months means that the indicator remains at present way below target.</p>
	<p>Performance Action Plan Managers expect the underlying trend to continue and have no cause to suspect that the target set will not be reached by the end of the year.</p>
	Action Plan Comments

3. Clean, Green & Liveable

Improving environmental management, the cleanliness and care of roads and pavements, and promoting a sustainable environment

3.1 Performance

Priority 3 - Monthly Indicators										
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against DoT Last year	Against Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10
⊕ BV215a.05 Rectify Street Lights-non-DNO	Number	6.79	5.00	▲	▶	▲	▶	▶	▶	★
⊕ LPI079 Percentage of fly tip removal jobs completed within 1 day	Percentage	63.55	55.00	★	▶	!	▶	★	★	★
⊕ LPI080 Percentage of recycling bins collected on time	Percentage	99.99	100.00	★	▶	!	▶	★	★	★
⊕ LPI720 Percentage of noise nuisance complaints receiving a visit within 45 minutes, if necessary	Percentage	97.07	98.75	●	▶	●	▶	●	●	●
⊕ LPI752 Percentage of graffiti removal jobs completed in 1 day	Percentage	99.91	99.50	★	▶	★	▶	★	★	★
Priority 3 - Monthly Indicators - latest data available										
Unit	YTD Sep 10	Target Sep 10	Against Target Sep 10	DoT Last year	Against DoT Last year	Against Benchmark (Top band)	DoT Last month	Against Target Aug 10	Against Target Jul 10	09/10
⊕ NI191 Residual household waste per household (KG)	Kg/Household	68.39	60.00	▶	▶	▶	▶	▶	▶	▶
⊕ NI192 Percentage of household waste sent for reuse, recycling and composting	Percentage	16.39	22.00	▶	▶	▶	▶	▶	▶	▶
⊕ NI193 Percentage of municipal waste land filled	Percentage	9.89	9.00	▶	▶	▶	▶	▶	▶	▶

3. Clean, Green and Liveable

Improving environmental management, the cleanliness and care of roads and pavements, and promoting a sustainable environment

3.2 Projects

Priority 03 projects						
	Directorate	Budget	Est. completion date	Current Status		
PMSRGN Street Lighting PFI	Regeneration	£79.5m PFI cr	Mar 2011 (Fin Close)			
PMSRGN Deptford Rise Public Realm (In Devel) Deptf TC	Regeneration	Section 106	TBC			
PMSCUS Rivers and People	Customer	£300k	Mar 2013			
PMSRGN Sydenham Park Footbridge	Regeneration	TBC	TBC			
PMSRGN Parklands	Regeneration	£1.96m	Mar 2011			
PMSRGN N. Lewisham Links (In Development)	Regeneration	£4m	Mar 2011			
PMSRGN Beck. Place Park Mansion Options (in Devel)	Regeneration	TBC	Apr 11			
PMSCUS Beck. Place Park Management Contract (in Devel)	Customer	TBC	Apr 11			
PMSRGN TFL Programme 10/11 (Formula element)	Regeneration	£3.21m	Mar 2011			
PMSRGN Pepys Environmental	Regeneration	£3.05m	Mar 12			
PMSRGN Highways Programme Prud. Borrowing	Regeneration	£3m	Mar 2011			
PMSRGN Sydenham Rd Area Based Scheme (In Devel)	Regeneration	£3.6m	Dec 11			

3. Clean, Green and Liveable

Improving environmental management, the cleanliness and care of roads and pavements, and promoting a sustainable environment

3.4 Finance

Net Expenditure Priority 03 (£000s)					
	2009/10 Budget	Projected year-end variance as at Nov 10	Variance	% variance	Comments
03. NI Clean, Green and Liveable	36,852	-563	▲	-1.53	<p>Finance Underspend</p> <p>The Transport Division is projecting an underspend of £270k, mainly as a result of street lighting works being limited to essential works, as the street lighting PFI comes to a close. A surplus of income from the utility companies for licences for permitted works is also forecasted. In the Environment Division, an increase in pest control income is expected, based on the level of activity in the previous year. This along with reduction of staffing cost, maintaining vacancies, and the utilisation of contingencies fund will result in an underspend of £276k. An additional underspend of £17k is expected in Regeneration's Performance & Strategy Division.</p>

Priority 04: Safety, Security and Visible Presence

Hot Topics

Police Reform and Social Responsibility Bill

In the Queen's 2010 speech, the government announced the introduction of legislation that would make the police service more accountable to local people and tackle alcohol-related violence, increase democratic accountability and empower local communities.

Police authorities to be replaced with directly elected police and crime commissioners to be introduced from May 2012. London already has a directly elected mayor as head of the MPA effectively fulfilling the role at present. Proposed changes to the Licensing Act will give more powers to local authorities and police to tackle any premises that are causing problems, increasing the maximum fine for persistent underage sales and permitting local authorities to charge more for late-night licences to contribute towards the cost of policing the late-night economy.

This act will enable provisions in local authority byelaws to include powers of seizure and forfeiture of new potentially harmful drugs whilst research is carried out and before the decision to ban is taken.

There will also be changes to the issue of arrest warrants for minor offences and increased powers for police to dispose of offences.

Priority 04: Summary

Performance Indicators	
Against Target Oct 10	Direction of Travel Oct 10 v Sep 10

Finance	
Variance Nov 10	Direction of Travel Nov 10 v Oct 10

Projects	
Current Status	Direction of Travel
n/a	n/a

Risk	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

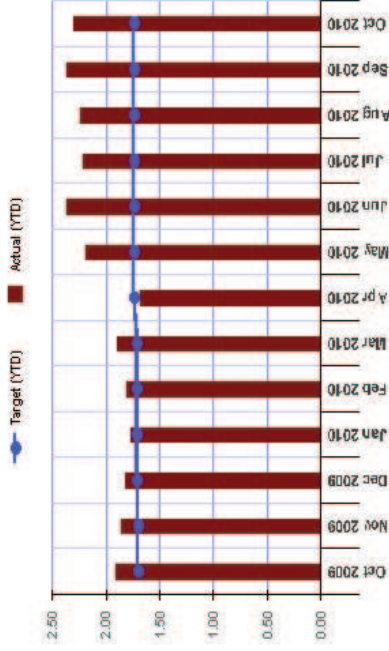
Areas Requiring Management Attention this Month

Performance Indicators - Monthly			
Against Target	External Benchmark	Direction of Travel Oct 10 v Mar 10	Direction of Travel Oct 10 v Sep 10
NI028 Serious knife crime rate			

NI028 - Serious knife crime rate

⊕ NI028 Serious knife crime rate

Number per 1000			
Actual (YTD)	Target (YTD)	Performance (YTD)	
1.91	1.70		▲
1.86	1.70		▲
1.82	1.71		▲
1.77	1.71		●
1.81	1.71		▲
1.89	1.71		▲
1.68	1.74		★
2.18	1.74		▲
2.37	1.74		▲
2.21	1.74		▲
2.24	1.74		▲
2.36	1.74		▲
2.30	1.74		▲



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NI028 - comment		
Responsible Officer	Performance Comments	Action Plan Comments
Head of Crime Reduction & Supporting People	<p>Performance Performance is not meeting target and offences are showing an increase of 22.0% compared to this period last year. Historically, Lewisham has seen a reduction in knife-enabled offending over 2009/10 due to a number of high-profile initiatives associated with Operation Blunt.</p>	<p>Performance Action Plan</p> <ul style="list-style-type: none"> Targeted work with robbery offenders and gang members, which are two areas that are key drivers behind knife-enabled crime. Operation Trilogy, Trilogy Plus and Police enforcement activity around Personal Robbery are all continuing. A number of targeted searches in areas or at events where the risk of violence is higher. Videos shown in schools around 'joint enterprise' legislation where associating with people who carry knives and commit crimes can have serious consequences even for those that do not directly take part in criminality Serious Youth Violence Menu of Options implementation Work with Head Teachers to start random Wand searches in schools Letters sent to parents of children who are involved in gangs Homeschooling agreement in place.

4. Safety, Security and Visible Presence

Improving Partnership working with the police and others and using the Council's powers to combat anti-social behaviour

4.1 Performance

Priority 4 - Monthly Indicators										
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10	
NI015 Serious violent crime rate	1.41	1.52	★	🟢	!!	🔴	★	★	🟡	
NI016 Serious acquisitive crime rate	25.55	27.26	★	🔴	!!	🔴	★	★	★	
NI020 Assault with injury crime rate	8.55	8.54	🟡	?	!!	🟢	🟡	★	!	
NI028 Serious knife crime rate	2.30	1.74	▲	🔴	!!	🟢	▲	▲	▲	
NI029 Gun crime rate	0.44	0.93	★	🟢	!!	🟢	★	★	▲	
NI033 Arson incidents	9.46	16.79	★	🔴	!!	🟢	★	★	★	
NI034 Domestic violence - murder	0.00	0.00	★	🟡	!!	🟡	★	★	★	
NI049i Number of primary fires per 100,000 population	196.38	180.18	▲	🟢	!	🟢	▲	▲	▲	

Priority 4 - Quarterly Indicators										
Unit	YTD Sep 10	Target Sep 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last quarter	Against Target Jun 10	Against Target Mar 10	09/10	
NI019 Rate of proven re-offending by young offenders	0.19	1.08	★	🟢	★	🟢	▲	🟡	🟡	
NI043 Young people within the YJS receiving a conviction in court who are sentenced to custody	7.54	5.00	▲	🟢	▲	🔴	▲	▲	▲	
NI111 First time entrants to the Youth Justice System aged 10 - 17	533.94	?	!	?	★	?	!	★	★	

Priority 05: Strengthening the Local Economy

Hot Topics

The Comprehensive Spending Review

The impact of the economic downturn in Lewisham is the major area of risk to the delivery of the Strengthening the Local Economy priority. The announcements within the Comprehensive Spending Review on the scale of public sector spending cuts will have a significant impact in Lewisham given that the borough has the highest rate of public sector employment in London. The Executive Management Team discuss the impact regularly, and all Directorates have added the impact of the economic downturn to their Directorate Risk registers.

Lewisham Council successfully bid for funding of more than £2.3m from the Future Jobs Fund which was used to create 398 roles targeted at young people aged 18-24 who have been out of work for six months or more. Lewisham College successfully bid for a share of £7m funding in order to set up new Apprenticeship Training Associations (ATAs) and Group Training Associations (GTAs). These new models of provision are designed to focus on opportunities for 16 to 18-year-olds. The Council made a commitment to 100 apprentice starts by 2012. The Council allocated £720K last year, and a further £720K this year to support the scheme. 52 apprenticeships have been created across the partnership so far this year, adding to the 29 created in 2009-10.

A number of funding streams which have been used to support our work on strengthening the local economy have been cut or will end in March 2011, including Working Neighbourhoods Fund, Local Authority Business Growth Incentive and the Future Jobs Fund. Given this reduction in external funding streams, our emphasis is shifting from direct delivery to finding new ways to find support for people who are out of work and/or on benefits. The Council will be active about establishing a close working relationship with the prime provider of the new Work Programme in our District, when they have been identified. We are currently undertaking co-design work with DWP and Job Centre Plus to design new solutions for worklessness. We are also exploring a potential partnership with LB Lambeth and Participle which will look at developing local self-sustaining solutions to tackle worklessness.

Priority 05: Summary

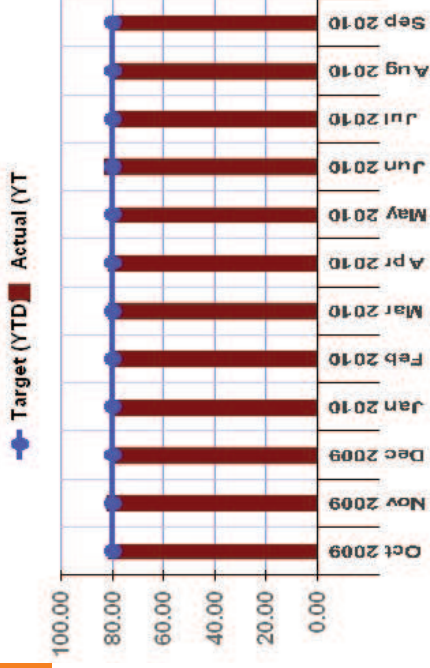
Performance Indicators		Finance	
Against Target Oct 10	★	Variance Nov 10	●
Direction of Travel Sep 10	▲	Direction of travel Oct 10	▲
Projects		Risk	
Current Status Nov 10	●	Current Status Nov 10	●
Direction of travel Oct 10	▲	Direction of travel Oct 10	▲

Areas Requiring Management Attention this Month

Performance Indicators			
Against Target	★	External Benchmark	▲
NI157c % of other planning applications determined within 8 weeks		Direction of Travel Oct 10 v Mar 10	▲
		Direction of Travel Oct 10 v Sep 10	▲

NI157c - % of other planning applications determined within 8 weeks

+ NI157c % of other planning applications determined within 8 weeks			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	81.75	80.00	★
Nov 2009	82.14	80.00	★
Dec 2009	81.18	80.00	★
Jan 2010	81.00	80.00	★
Feb 2010	80.83	80.00	★
Mar 2010	81.60	80.00	★
Apr 2010	81.43	80.00	★
May 2010	80.87	80.00	★
Jun 2010	83.13	80.00	★
Jul 2010	80.34	80.00	★
Aug 2010	80.94	80.00	★
Sep 2010	80.16	80.00	★
Oct 2010	80.05	80.00	★



NI157c - comment	
Responsible Officer	Performance Comments
Head of Planning	<p>Performance Performance improved slightly to approx. 79% in October. The cumulative result is on target at 80%.</p> <p>Action Plan Comments Performance Action Plan The use of pre-application discussions with developers has facilitated the speed of decisions once the applications are submitted.</p>

5. Strengthening the Local Economy

Gaining resources to regenerate key localities, strengthen employment skills and promote public transport

5.1 Performance

Priority 5 - Monthly Indicators											
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year band	Against Benchmark (Top band)	External (Top)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10	
Percentage	14.63	35.00	★	🟢	!!		🔴	★	★	🔴	
Percentage	76.19	60.00	★	🟢	▲		🔴	★	★	★	
Percentage	85.61	70.00	★	🟢	★		🔴	★	★	★	
Percentage	80.05	80.00	★	🔴	▲		🔴	★	★	★	
+ BV204 % Planning appeals allowed											
+ NI157a Processing of major applications within 13 weeks											
+ NI157b % Minor planning apps within 8 weeks											
+ NI157c % of other planning applications determined within 8 weeks											
Priority 5 - Quarterly Indicators											
Unit	YTD Sep 10	Target Sep 10	Against Target Sep 10	DoT Last year band	Against Benchmark (Top band)	External (Top)	DoT Last quarter	Against Target Jun 10	Against Target Mar 10	09/10	
Percentage	66.60	?	!!	?	!!		?	!!	?!	?!	
Percentage	15.60	18.00	★	🟢	!		🟢	★	★	★	
Percentage	26.00	?	!	?	!		?	!	?!	?!	
NI151 Overall employment rate (working-age)											
NI152 Working age people on out of work benefits											
NI153 Working age people claiming out of work benefits in the worst performing neighbourhoods											

5. Strengthening the Local Economy

Gaining resources to regenerate key localities, strengthen employment skills and promote public transport

5.1 Performance

Priority 05 - Monthly volume indicators									
	Unit	YTD Oct 10	YTD Sep 10	YTD Aug 10	YTD Jul 10	YTD Jun 10	YTD May 10	YTD Apr 10	YTD Mar 10
LPI444 % of vacant council-owned commercial properties	Percentage	6.54	6.54	6.54	6.37	6.37	6.37	6.37	6.86
LPI471 Job Seekers Allowance claimant count	Number	9,475.00	9,392.00	9,414.00	9,077.00	9,329.00	9,329.00	9,329.00	9,329.00
LPI472 Job Seekers Allowance claimant rate	Percentage	5.10	5.00	5.00	4.80	5.20	5.20	5.20	5.20
Priority 05 - Quarterly volume indicators									
	Unit	Mar 10	Jun 10	Sep 10	Dec 09	Mar 09	Jun 09	Sep 09	Dec 08
LPI473 Unemployment rate as a % of the working age population	Percentage	10.00	8.70	10.00	?	8.70	8.70	8.70	8.70

5. Strengthening the Local Economy

Gaining resources to regenerate key localities, strengthen employment skills and promote public transport

5.2 Projects

Priority 05 projects				
	Directorate	Budget	Est. completion date	Current Status
PMSRGN Deptford Station Deptf TC Prog	Regeneration	£10.9m	Dec 2011	🟡
PMSRGN Catford Town Centre (In Devel)	Regeneration	TBC	TBC	🟢

Priority 06: Decent Homes for All

Hot Topics

Lewisham Homes

The Council's ALMO Lewisham Homes has completed its inspection and has been awarded 2 Stars. The Audit Commission published Lewisham Homes inspection report on 7 October 2010. Lewisham Homes is currently developing an action plan to address the recommendations in the report for discussion with the Council and their Board. As the previous Housing Minister has advised that Round 6 ALMOs would not receive funding until 2011, work is continuing to develop a contingency plan. We are awaiting the detail of the new Government's approach to funding Decent Homes.

Priority 06: Summary

Performance Indicators	
Against Target Oct 10	★
Direction of Travel Sep 10	▲

Finance	
Variance Nov 10	★
Direction of Travel Oct 10	▲

Projects	
Current Status Nov 10	●
Direction of Travel Oct 10	▲

Risk	
Current Status Nov 10	●
Direction of Travel Oct 10	▲

Areas Requiring Management Attention this Month

Projects - Red		
Directorate	Customer	Current Status
PMSCUS Kender New Build grant phase 3 South	Customer	▲

6. Decent Homes for All

Investment in social and affordable housing to achieve the Decent Homes standard, tackle homelessness and supply key worker housing

6.1 Performance

Priority 6 - Monthly Indicators										
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10	
+ LPI035 % Tenants > 7wks Gross Arrears	8.34	7.00	▲	▲	!!	▲	▲	▲	▲	
+ LPI036 (MKPI 14) Percentage of rent collected	97.23	98.00	●	▲	!!	▲	●	●	●	
+ LPI037 Average Time to Re-let	20.54	24.00	★	▲	!!	▲	★	★	▲	
LPI067 Number of cases where homelessness was prevented via other housing options/rights advice	106.43	70.00	★	▲	!!	▲	★	★	★	
+ LPI705 Percentage urgent repairs completed within timescales	99.22	99.00	★	▲	!!	▲	★	★	★	
+ LPI056 Number of households living in Temporary Accommodation	975.00	943.00	●	▲	★	▲	●	●	★	

6. Decent Homes for All

Investment in social and affordable housing to achieve the Decent Homes standard, tackle homelessness and supply key worker housing

6.1 Performance









LPI030 reports on stock transfers that take place in the quarter. The last transfer took place in October 2010. The figures will be reported shortly.

Priority 06 - Volume indicators						
	Unit	YTD Oct 10	YTD Jul 10	YTD Apr 10	YTD Jan 10	08/09
■ LPI030 Percentage of stock transferred to RSL's meeting decent homes standard	Percentage	?	?	?	?	?

6. Decent Homes for All

Investment in social and affordable housing to achieve the Decent Homes standard, tackle homelessness and supply key worker housing


6.2 Projects

Priority 06 projects					
	Directorate	Budget	Est. completion date	Current Status	
PMSCUS Kender New Build grant phase 3 South	Customer	£1.49m	TBC		
PMSCUS Kender New Build grant phase 4	Customer	£1.54m	2011		
PMSCUS Excalibur Regeneration	Customer	£386k	2018		
PMSCUS Lewisham Homes Capital Programme	Customer	£13.1m 2011	Mar 2011		
PMSCUS Heathside & Lethbridge Redevelopment	Customer	£1.9m (Ph3)	Autumn 2012		
PMSRGN Resol. Studios - Deptf TC prog	Regeneration	£6.2m RSL	Sep 2011		
PMSCUS Honor Oak New Build Grant	Customer	£1m (Section 106)	Feb 2011		
PMSRGN Southern Site Housing -Deptf TC Prog	Regeneration	TBC	TBC		

6. Decent Homes for All

Investment in social and affordable housing to achieve the Decent Homes standard, tackle homelessness and supply key worker housing

6.2 Projects

Red Projects			
	Senior Responsible Officer	Project Aim	Current status
PMSCUS Kender New Build grant phase 3 South	Customer Services. ED	Project Aim Kender New-Build Phase 3 South	
<p>The budget for this scheme relates to the affordable housing element of the Kender Phase 3 South (NDC Centre) scheme. New Cross Gate NDC funded site assembly costs and gained planning permission for a mixed development which included provision of private housing for sale as well as affordable housing, community facilities, library, gym and retail units. Due to housing market conditions, the original developer pulled out.</p> <p>The NDC Board chose Building Better Health as the new development partner to continue the dialogue process with. Officers have received expert advice, confirming the Council's concerns about the viability of the BBH proposals under current market conditions. BBH have proposed amendments to the scheme but these differ considerably from the consented scheme and do not align well with New Cross Gate Trust objectives. They would have a major impact on Trust income and could leave the Authority exposed to clawback of NDC Programme grant. Officers are examining options for the site. The vacant site is currently being used by TFL as a site compound for the major road works to remove the gyratory system.</p> <p>This project will remain Red until a development agreement for a viable scheme is in place.</p>			

Priority 07: Protection of Children

Hot Topics

There are no 'Hot Topics' for Priority 7 this month.

Priority 07: Summary

Performance Indicators	
Against Target Oct 10	Direction of Travel Oct 10 v Sep 10

Finance	
Variance Nov 10	Direction of Travel Nov 10 v Oct 10

Projects	
Against Target n/a	Direction of Travel n/a

Risk	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

Areas Requiring Management Attention this Month

Performance Indicators

	Against Target	External Benchmark	Direction of Travel Oct 10 v Mar 10	Direction of Travel Oct 10 v Sep 10
NI060 Percentage core assessments for children's social care carried out < 35 working days				
NI062 Stability of placements of looked after children: number of moves				
NI063 Stability of placements of looked after children: length of placement				
NI064 Child protection plans lasting 2 years or more				
NI068 Percentage of referrals to children's social care going on to initial assessment				

Finance - Net Expenditure - Reds (£000s)

	% variance	variance
07. NI Protection of Children	1.95	873.00

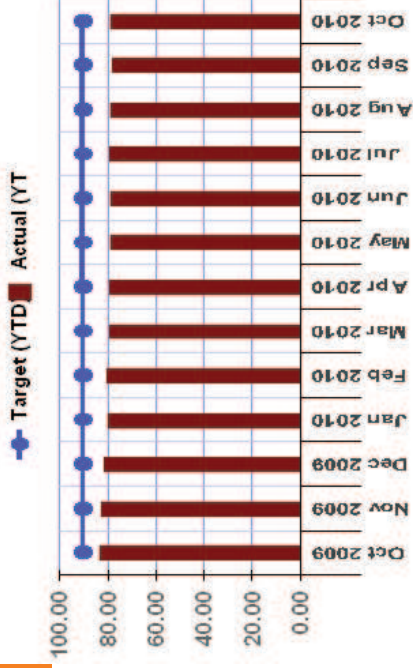
Red Risks - Corporate Risk Register

	Responsible Officer	Current Status
RMSCOR18 Avoidable death or serious injury to client or employee	Chief Executive	

NI060 - Percentage core assessments for children's social care carried out <35 working days

NI060 Percentage core assessments for children's social care carried out < 35 working days

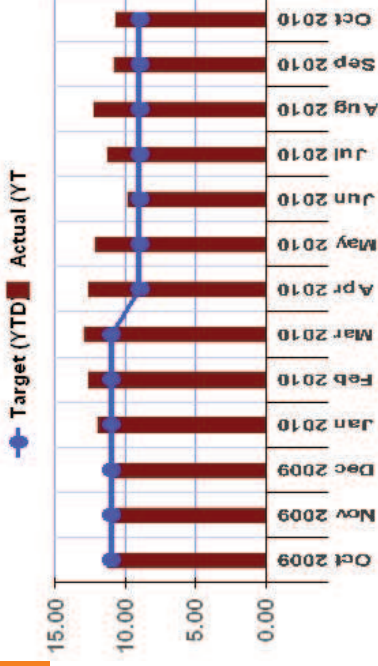
	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	83.40	90.25	▲
Nov 2009	82.40	90.25	▲
Dec 2009	81.30	90.25	▲
Jan 2010	80.00	90.25	▲
Feb 2010	80.20	90.25	▲
Mar 2010	79.40	90.25	▲
Apr 2010	79.10	90.50	▲
May 2010	78.80	90.50	▲
Jun 2010	78.70	90.50	▲
Jul 2010	79.00	90.50	▲
Aug 2010	78.70	90.50	▲
Sep 2010	78.00	90.50	▲
Oct 2010	78.70	90.50	▲



NI060 - comment		
Responsible Officer	Performance Comments	Action Plan Comments
Director of Children's Social Care	<p>Performance We continue to out-perform our statistical neighbours in this area but have not yet achieved our target.</p>	<p>Performance Action Plan Lewisham has had a significant increase in contacts and cases leading to Core Assessments. Performance has dropped, but we are currently providing a weekly report on all Core Assessments that are overdue and ensuring that social workers understand the need to complete this work in a timely manner.</p>

NI062 - Stability of placements of looked after children: number of moves

NI062 Stability of placements of looked after children: number of moves			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	11.30	11.00	●
Nov 2009	11.00	11.00	★
Dec 2009	10.80	11.00	★
Jan 2010	11.90	11.00	▲
Feb 2010	12.60	11.00	▲
Mar 2010	12.90	11.00	▲
Apr 2010	12.60	9.00	▲
May 2010	12.10	9.00	▲
Jun 2010	9.80	9.00	▲
Jul 2010	11.30	9.00	▲
Aug 2010	12.20	9.00	▲
Sep 2010	10.80	9.00	▲
Oct 2010	10.70	9.00	▲

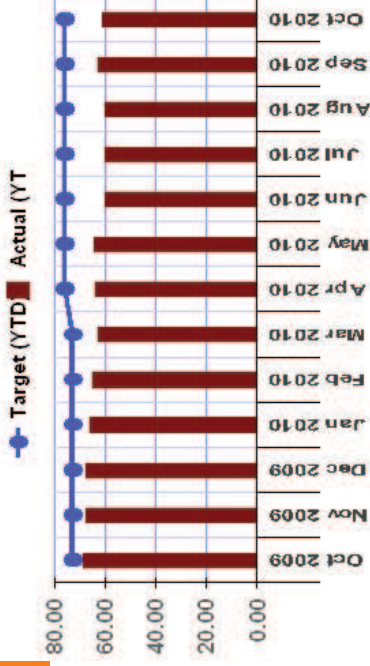


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NI062 - comments	
Responsible Officer	Action Plan Comments
Director of Children's Social Care	<p>Performance Comments</p> <p>Performance Factors impacting on performance have been the age and behavioural difficulties of the child / young person; school attendance; carers and schools' capacity to manage difficult behaviour; effective matching of children to the carers; capacity of social workers and other agencies to respond to issues that arise during placements. Good performance in NI062 is typified by a lower percentage.</p> <p>Performance Action Plan Placement support meetings are arranged with carers to develop placement stability which focuses on the early identification and tracking of fragile placements and the provision of multi-agency & multi-disciplinary support to carers to prevent breakdown. This support includes the diversion from exclusion from school by additional assistance in class and direct CAMHS consultation with carers. Challenging behaviour of older children continues to be a focus of attention with carers being helped with strategies to reduce the impact of negative behaviour.</p>

NI063 - Stability of placements of looked after children: length of placement

NI063 Stability of placements of looked after children: length of placement			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	68.80	73.00	▲
Nov 2009	67.40	73.00	▲
Dec 2009	67.60	73.00	▲
Jan 2010	66.20	73.00	▲
Feb 2010	64.90	73.00	▲
Mar 2010	62.80	73.00	▲
Apr 2010	63.60	76.00	▲
May 2010	64.40	76.00	▲
Jun 2010	60.10	76.00	▲
Jul 2010	59.90	76.00	▲
Aug 2010	60.30	76.00	▲
Sep 2010	62.50	76.00	▲
Oct 2010	61.30	76.00	▲

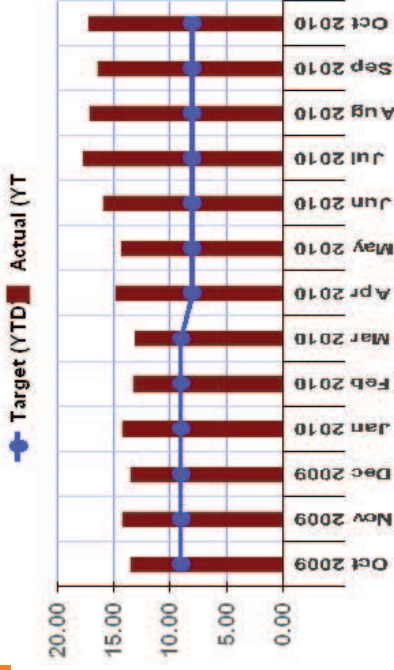


NI063 - comment	
Performance Comments	Action Plan Comments
<p>Performance This performance measure relates to the number of children under 16 who have been looked after for more than 2.5 years who have remained in the same placement for 2 years. Performance of 61.31% in October showed a decrease of 1.19% from the previous month. There were no changes of placements during October and the change in performance was a result of a change in the number of children who have been looked after for 2.5 years and the number who had been in the same placement for 2 years. The numbers of looked after children are changing daily and during October a number of children became 16 and also left care.</p>	<p>Performance Action Plan Placement support is arranged to prevent the disruption of placements which includes support to the carer, respite arrangements and support in school.</p>
<p>Responsible Officer</p>	
<p>Director of Children's Social Care</p>	

NI064 - Child protection plans lasting two years or more

⊕ NI064 Child protection plans lasting 2 years or more

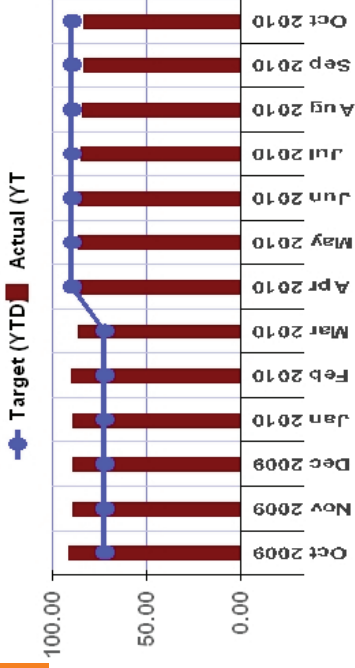
	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	13.40	9.00	▲
Nov 2009	14.10	9.00	▲
Dec 2009	13.40	9.00	▲
Jan 2010	14.10	9.00	▲
Feb 2010	13.20	9.00	▲
Mar 2010	13.00	9.00	▲
Apr 2010	14.70	8.00	▲
May 2010	14.30	8.00	▲
Jun 2010	15.90	8.00	▲
Jul 2010	17.70	8.00	▲
Aug 2010	17.00	8.00	▲
Sep 2010	16.30	8.00	▲
Oct 2010	17.20	8.00	▲



NI064 - comment	
Responsible Officer	Action Plan Comments
Director of Children's Social Care	<p>Performance The data on NI 64 can be misleading. Performance is based on the numbers of children who have ceased to be the subject of a child protection plan after a minimum period of two years. When a child protection plan is ended for these children, they are represented in this category. Although the overall number of children subject to a child protection plan will look as though it has increased, in actual terms the numbers of children subject to a child protection plan is going down.</p> <p>Performance Action Plan The current numbers of children subject to a child protection plan for more than 2 years is decreasing. However in order to avoid an increase in the future a new way of analysing information and planning has been discussed at Senior Management Team and a training day was arranged for 6 October 2010 for all Child Protection Conference Chairs. The training was to help Child Protection Conference Chairs to analyse factors that have contributed to prolonged registrations and improve child protection plans.</p>

NI068 - Percentage of referrals to children's social care going on to initial assessment

+ NI068 Percentage of referrals to children's social care going on to initial assessment			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	91.70	72.50	★
Nov 2009	89.00	72.50	★
Dec 2009	89.30	72.50	★
Jan 2010	89.20	72.50	★
Feb 2010	89.70	72.50	★
Mar 2010	86.30	72.50	★
Apr 2010	88.70	90.00	●
May 2010	86.60	90.00	●
Jun 2010	86.40	90.00	●
Jul 2010	85.20	90.00	▲
Aug 2010	84.30	90.00	▲
Sep 2010	83.80	90.00	▲
Oct 2010	83.70	90.00	▲



NI068 - comments	
Performance Comments	Action Plan Comments
<p>Performance</p> <p>We have recently implemented a procedure in which only those cases which require a social work assessment will be progressed to Referral. There are a number of reasons why this does not yet occur in all cases. All cases in which one-off financial payments are made to children in need administratively require progressions to referral. The ICS system can create administrative processes which lead to contacts being progressed to Referral when this is not the desired outcome. A number of cases are progressed to referral for Initial Assessment which are subsequently cancelled because, for example, the child or family does not live in the borough. These are currently still recorded as a referral although they do not lead to Initial Assessment.</p>	<p>Performance Action Plan</p> <p>We are working to ensure that the administrative and recording issues which effect our performance in this area are being addressed through a programme of auditing and discussions in management meetings. We are also working with our ICS provider to iron out inappropriate administrative processes.</p>

7. Protection of Children

Better safe-guarding and joined-up services for children at risk

7.1 Performance

Priority 7 - Monthly Indicators										
	Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10
LPI182 % of referrals that were due to, or categorised as, 'abuse/neglect'.	Percentage	36.10	44.00	★	🔴	⚠️	🟢	★	★	★
NI059 Percentage of Initial assessments for children's social care carried out < 7 working days	Percentage	90.10	88.00	★	🟢	★	🔴	★	★	★
NI060 Percentage core assessments for children's social care carried out < 35 working days	Percentage	78.70	90.50	🔴	🔴	🔴	🟢	🔴	🔴	🔴
NI062 Stability of placements of looked after children: number of moves	Percentage	10.70	9.00	🔴	🔴	🔴	🟢	🔴	🔴	🔴
NI063 Stability of placements of looked after children: length of placement	Percentage	61.30	76.00	🔴	🔴	🔴	🔴	🔴	🔴	🔴
NI064 Child protection plans lasting 2 years or more	Percentage	17.20	8.00	🔴	🔴	🔴	🔴	🔴	🔴	🔴
NI065 Children becoming the subject of a Child Protection Plan for a second or subsequent time	Percentage	9.80	10.00	★	🟢	★	🟢	★	★	★
NI066 Looked after children cases which were reviewed within required timescales	Percentage	93.40	99.00	🔴	🟢	🟡	🔴	🟡	🔴	🔴
NI067 Percentage of child protection cases which were reviewed within required timescales	Percentage	98.90	100.00	🟡	🟢	🟡	🟢	🟡	🔴	🔴
NI068 Percentage of referrals to children's social care going on to initial assessment	Percentage	83.70	90.00	🔴	🔴	★	🔴	🔴	🔴	★

7. Protection of Children

Better safe-guarding and joined-up services for children at risk

7.1 Performance

Priority 07 - Volume indicators							
Unit	YTD Oct 10	YTD Sep 10	YTD Aug 10	YTD Jul 10	09/10		
LPI128 No.Contacts per 1,000 U18	21.00	22.00	20.60	28.40	25.40		
⊕ LPI137 CH39 Number LAC per 10,000 under 18 LBL	84.90	87.10	88.30	89.00	92.50		
⊕ LPI141 CH01 No.on CPR per 10,000 LBL	36.90	35.30	35.80	35.50	35.20		
LPI301 No. of children on CPR 'as at'	212.00	203.00	206.00	204.00	203.00		
LPI302 No. of LAC 'as at'	488.00	501.00	508.00	512.00	526.00		
LPI309a Number of Referrals per month	255.00	265.00	256.00	295.00	344.00		
LPZ120 No.Initial Assessments per 10,000 LBL	499.00	513.00	525.00	525.00	571.00		
LPZ121 No.Core Assessments per 10,000 LBL	313.00	318.00	325.00	331.00	362.80		

7. Protection for Children

Better safe-guarding and joined-up services for children at risk

7.3 Risk

Priority 7 - Corporate Risk Register - Red Risks				
Current status				
<p>RMSCOR18</p> <p>Avoidable death or serious injury to client or employee</p>				▲
Priority 7 - Corporate Risk Register - Red Risks				
Consequences	DoT Current Quarter v Previous Quarter	Responsible Officer	Comments	
<p>RMSCOR18</p> <p>Avoidable death or serious injury to client or employee</p>	↑	Chief Executive	<p>Risk - What are the worst consequences of the risk? Avoidable death or serious injury to child/ adult client or employee. Negative impact on performance. Diversion of resources.</p> <p>Risk - What are we planning to do? Programme of Safe and Sound work completed and report reviewed by CYP DMT August 2010. Safeguarding Board monitors action plans from Serious Case Reviews. Adherence to CYP Lone Working Policy, violence to staff meetings and review of lessons learnt. ASC Safeguarding process has been reviewed.</p> <p>Risk - What have we done to control the risk? Adhere to rigorous practice, risk assessments, monitoring & audit. Strength of partnerships. Quality control. regular and ongoing reviews. Monitoring by DMT. Ensure safeguarding plans fully implemented. Regular supervision.</p> <p>Risk Notes Safe & Sound Programme Completed. Lewisham's Safeguarding Children Board has looked at Road Traffic Accidents deaths.</p>	

7. Protection of Children

Better safe-guarding and joined-up services for children at risk

7.4 Finance

Net Expenditure Priority 07 (£000s)					
	2009/10 Budget	Projected year-end variance as at Dec 10	Variance	% variance	Comments
07. NI Protection of Children	44,661	873	▲	1.95	<p>Finance Overspend An overspend of £873k is projected within the Children's Social Care Division following reported pressures of £3.685m and management action of £2.816m. The numbers to be supported and complexities of needs of families remains a challenge. However, it is considered that alternative provisions can be found for clients requiring secure accommodation. The panel which review placement proposals remains in force</p>

Priority 08: Caring for Adults and Older People

Hot Topics

Charging Consultation

Consultation on charging for Adult Social Care closed on 30 November. A significant amount of outreach activity was undertaken to ensure that all service users have had the opportunity to have their opinions captured, including the widespread use of community partners. As a result, there has been a good response, with over 600 surveys received. These are currently being analysed and detailed proposals will be put to the Mayor in the new year.

Priority 08: Summary	
Performance Indicators	Finance
Against Target Oct 10	Variance Nov 10
Direction of Travel Oct 10 v Sep 10	Direction of Travel Nov 10 v Oct 10
▲	●
Projects	Risk
Current Status Nov 10	Current Status Nov 10
Direction of Travel Nov 10 v Oct 10	Direction of Travel Nov 10 v Oct 10
★	▲
▲	▲

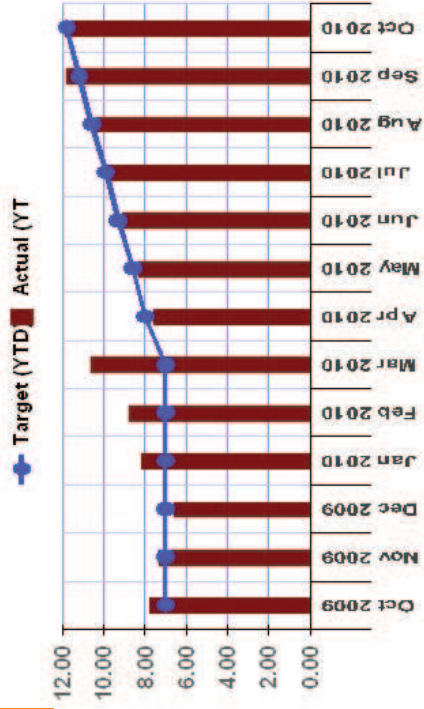
Areas Requiring Management Attention this Month

Performance Indicators				
	Against Target	External Benchmark	Direction of Travel Oct 10 v Mar 10	Direction of Travel Oct 10 v Sep 10
NI130 Social Care clients receiving Self Directed Support (Direct Payments and Individual Budgets)	★	▲	▲	▲
NI132 Timeliness of social care assessment (all adults)	▲	▲	▲	▲
NI133 Timeliness of social care packages following assessment	▲	▲	▲	▲
NI135 Carers receiving needs assessment or review and a specific carer's service, or advice & inf.	▲	▲	▲	▲
NI146 Adults with learning disabilities in employment	▲	▲	▲	▲

Red Risks		
Responsible Officer	Current Status	
RMSCOM04 Avoidable death or serious injury of Client or Staff Member	Head of Adult Assessment and Care Management, Head of Communities and Neighbourhood Development; Head of Cultural Services; Head of Crime Reduction.	▲

NI130 - Social Care clients receiving Self Directed Support (Direct Payments and Individual Budgets)

+ NI130 Social Care clients receiving Self Directed Support (Direct Payments and Individual Budgets)			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	7.75	7.00	★
Nov 2009	7.27	7.00	★
Dec 2009	6.60	7.00	▲
Jan 2010	8.17	7.00	★
Feb 2010	8.73	7.00	★
Mar 2010	10.59	7.00	★
Apr 2010	7.56	8.00	▲
May 2010	8.27	8.60	●
Jun 2010	9.11	9.30	●
Jul 2010	9.88	9.90	●
Aug 2010	10.31	10.60	●
Sep 2010	11.79	11.20	★
Oct 2010	11.89	11.80	★

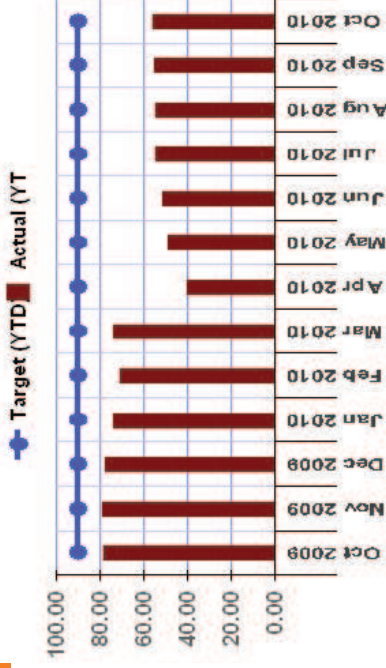


NI130 - comment		
Responsible Officer	Performance Comments	Action Plan Comments
Programme Director Adult Social Care & Health Modernisation	<p>Performance All new clients are routinely offered a direct payment. However this is not something every client chooses to take up.</p>	<p>Performance Action Plan Progress in developing and allocating Personal Budgets is advanced. Data has been submitted and is being processed by FACE, an external assessment development company. Tenders for additional external support planning are currently being sought to supplement arrangements already in place with Freewood. In addition, a small pilot of clients across all client groups has been started to test the effectiveness of allocation methodologies and support planning arrangements.</p>

NI132 - Timeliness of social care assessment (18+)

NI132 Timeliness of social care assessment (all adults)

	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	77.9	90.0	▲
Nov 2009	78.7	90.0	▲
Dec 2009	77.4	90.0	▲
Jan 2010	73.5	90.0	▲
Feb 2010	70.9	90.0	▲
Mar 2010	73.4	90.0	▲
Apr 2010	40.1	90.0	▲
May 2010	49.0	90.0	▲
Jun 2010	51.3	90.0	▲
Jul 2010	54.5	90.0	▲
Aug 2010	54.7	90.0	▲
Sep 2010	55.2	90.0	▲
Oct 2010	55.5	90.0	▲

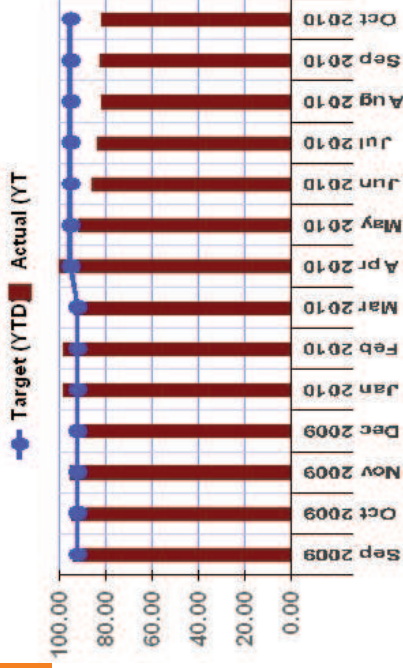


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NI132 - comment	
Responsible Officer	Performance Comments
Programme Director Adult Social Care & Health Modernisation	<p>Performance The reports compiled from data on the new system still require further adjustment to correctly link contact referrals to the date of assessment. The reported performance result is therefore lower than expected at present.</p> <p>Action Plan Comments Performance Action Plan Work to refine the reporting systems from the new Adult Social Care database continues, to ensure the provision of accurate performance reporting. All Adult Social Care teams continue to prioritise the assessment of newly referred clients to ensure they receive their assessment within acceptable timescales.</p>

NI133 - Timeliness of social care packages following assessment

+ NI133 Timeliness of social care packages following assessment			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	94.38	92.00	★
Nov 2009	94.92	92.00	★
Dec 2009	94.34	92.00	★
Jan 2010	98.07	92.00	★
Feb 2010	98.18	92.00	★
Mar 2010	93.66	92.00	★
Apr 2010	100.00	95.00	★
May 2010	91.95	95.00	●
Jun 2010	85.81	95.00	▲
Jul 2010	83.33	95.00	▲
Aug 2010	81.89	95.00	▲
Sep 2010	82.10	95.00	▲
Oct 2010	81.67	95.00	▲

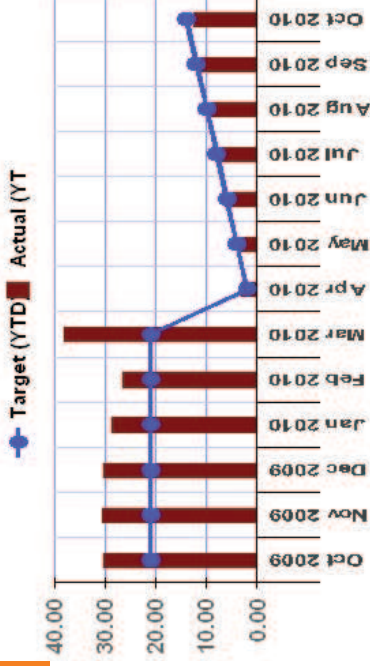


NI133 - comment	
Responsible Officer	Action Plan Comments
Programme Director Adult Social Care & Health Modernisation	<p>Performance Comments</p> <p>Reports compiled from data on the new system still require further adjustment to correctly identify the last service put in place for the client. The reported performance result is therefore significantly lower than expected at present.</p> <p>Performance Action Plan</p> <p>Work to refine the reporting systems from the new Adult Social Care database continues, to ensure the provision of accurate performance reports. All Adult Social Care teams continue to prioritise newly referred clients to ensure they receive their care packages within acceptable timescales.</p>

NI135 - Carers receiving needs assessment or review and a specific carer's service, or advice & inf.

⊕ NI135 Carers receiving needs assessment or review and a specific carer's service, or advice & inf.

Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	30.27	21.00	★
Nov 2009	30.47	21.00	★
Dec 2009	30.25	21.00	★
Jan 2010	28.61	21.00	★
Feb 2010	26.42	21.00	★
Mar 2010	38.10	21.00	★
Apr 2010	3.17	2.00	★
May 2010	3.85	4.00	●
Jun 2010	6.34	6.00	★
Jul 2010	8.14	8.00	★
Aug 2010	9.77	10.00	●
Sep 2010	11.00	12.00	▲
Oct 2010	12.63	14.00	▲

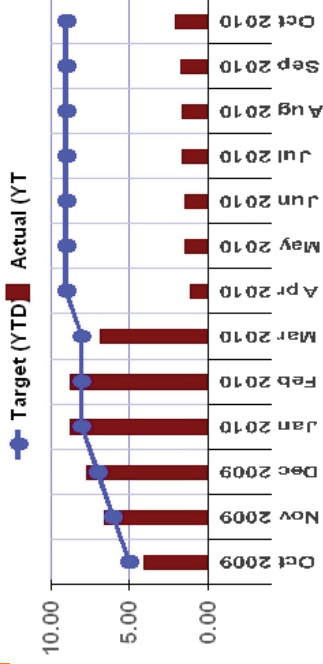


NI135 - comment	
Responsible Officer	Action Plan Comment
<p>Performance Comment</p> <p>Performance This indicator relies on a cumulative pattern of assessments, reviews and resulting provisions built up across the year. The number of separate carer assessments and carers' Direct Payments has continued to rise. This is due to an increase in the uptake of carers taking part in the Lewisham Carers Strategy Demonstrator Site.</p>	<p>Performance Action Plan The Carers Strategic Development Officer has developed a carers' assessment training programme and is currently providing training and performance updates to social care teams. The Lewisham Carers Strategy Demonstrator Site is also providing additional resources to increase the number of assessments of those carers providing support for people with dementia. In addition work is being undertaken to improve the records kept on carers of older adults with dementia and other mental health problems supported by the South London and Maudsley Trust.</p>

NI1146 - Adults with learning disabilities in employment

NI1146 Adults with learning disabilities in employment

	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	4.04	5.00	▲
Nov 2009	6.56	6.00	★
Dec 2009	7.73	7.00	★
Jan 2010	8.75	8.00	★
Feb 2010	8.75	8.00	★
Mar 2010	6.85	8.00	▲
Apr 2010	1.11	9.00	▲
May 2010	1.43	9.00	▲
Jun 2010	1.43	9.00	▲
Jul 2010	1.59	9.00	▲
Aug 2010	1.59	9.00	▲
Sep 2010	1.75	9.00	▲
Oct 2010	2.07	9.00	▲



NI1146- comment		
Responsible Officer	Performance Comments	Action Plan Comments
Head of Adult Assessment & Care Management	<p>Performance The figure shown is an estimate based on interim available data which will be refined during the year. Current data is based on clients that have been reviewed this year to date, and does not give a full account of the current situation. The numbers in settled accommodation will increase as the year progresses.</p>	<p>Performance Action Plan The Employment Strategy for Adults with Learning Disabilities includes the following actions to improve performance:</p> <ul style="list-style-type: none"> • Increase the capacity of current job coaching. • Increase the competence of local providers to support people in employment once it is found. • Explore options with other large local providers, such as health and education, to support employment. • Develop a local employer 'awareness' programme and support for new employers to consider employing adults with learning disabilities in their workforce.

8. Caring for Adults and Older People

Working with Health Services to support older people and adults in need of care

8.1 Performance

Priority 8 - Monthly Indicators										
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year band	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10	
NI130 Social Care clients receiving Self Directed Support (Direct Payments and Individual Budgets)	11.89	11.80	★	🔴	▲	🔴	★	🟡	★	
NI131 Delayed transfers of care	1.16	2.50	★	🟢	★	🟢	★	★	★	
NI132 Timeliness of social care assessment (all adults)	55.50	90.00	▲	🔴	▲	🟢	▲	▲	▲	
NI133 Timeliness of social care packages following assessment	81.67	95.00	▲	🔴	▲	🔴	▲	▲	★	
NI135 Carers receiving needs assessment or review and a specific carer's service, or advice & inf.	12.63	14.00	▲	🔴	▲	🔴	▲	🟡	★	
NI136 People supported to live independently through social services (all adults)	4,149.97	3,700.00	★	🟢	★	🟢	★	★	★	
NI145 Adults with learning disabilities in settled accommodation	?	70.00	?	?	?	?	?	?	★	
NI146 Adults with learning disabilities in employment	2.07	9.00	▲	🔴	▲	🟢	▲	▲	▲	

Priority 8 - Quarterly Indicators										
Unit	YTD Jun 10	Target Jun 10	Against Target Jun 10	DoT Last year	Against External Benchmark (Top band)	DoT Last quarter	Against Target Mar 10	Against Target Dec 09	09/10	
NI141 Percentage of vulnerable people achieving independent living	89.51	90.00	🟢	🟢	★	🟢	🟡	★	🟡	
NI142 Percentage of vulnerable people who are supported to maintain independent living	97.52	99.00	🔴	🔴	🟡	🔴	★	🟡	★	

8. Caring for Adults and Older People

Working with Health Services to support older people and adults in need of care

8.1 Performance

Priority 08 - Volume indicators						
Unit	YTD Oct 10	YTD Sep 10	YTD Aug 10	YTD Jul 10	09/10	
AO/D40i Total clients receiving a review	Number	2,253	2,085	1,890	1,536	3,989
AO/D40ii Total SLaM clients receiving a review	Number	872	520	520	505	1,268
ASC001 Total service users	Number	5,678	5,598	5,596	5,391	7,038
NI130n Number of Adults and Carers receiving Self Directed Support	Number	698	660	593	546	707
NI131n Av no. delayed transfers of care in wk taken over the year	Number	2	3	3	3	7
NI132d No. new clients for whom contact was made in the financial year	Number	782	735	651	550	2,459
NI132n No. for whom length of time from first contact to completion of assessment <= 4 wks	Number	434	406	356	300	1,806
NI133d No. new clients whose assessment completed & received all services in reporting year	Number	371	324	265	210	1,168
NI133n No. where time from assessment to provision of all services in a care package is <=28 days	Number	303	266	217	175	1,094
NI135d No. adults receiving community-based service during year	Number	5,678	5,643	5,536	5,492	6,016
NI135n No. carers receiving 'carer's break' following assessment/review	Number	717	621	541	447	2,292

8. Caring for Adults and Older people

Working with Health Services to support older people and adults in need of care

8.2 Projects

Priority 08 projects				
	Directorate	Budget	Est. completion date	Current Status
PMSCOM Adult SC&H Modernisation (In Development)	Community	£1.25m	Mar 2011	★

8. Caring for Adults and Older people

Developing opportunities for the active participation and engagement of people in the life of the community

8.3 Risk

Priority 8 - Corporate Risk Register - Red Risks				
Current status				
RMSCOM04 Avoidable death or serious injury of Client or Staff Member				▲
Priority 8 - Corporate Risk Register - Red Risks				
Consequences	DoT Current Quarter v Previous Quarter	Responsible Officer	Comments	
Avoidable serious injury or death of client or staff member. Service delivery impact; Financial/compensation and reputation impact.	↑	Head of Adult Assessment and Care Management, Head of Communities and Neighbourhood Development; Head of Cultural Services; Head of Crime Reduction.	<p>Risk - What are we planning to do? Service level risk assessment; monitoring by DMT; Directorate H & S Committee to review policy/guidance. Ensure safeguarding plans fully implemented. Regular supervision of staff procedures.</p> <p>To ensure that providers follow appropriate safeguarding procedures. London wide safeguarding procedures are to be implemented immediately.</p> <p>Risk - What have we done to control the risk? Adherence to rigorous H & S practice; current risk assessment; monitoring and audit, all services to comply with HSE requirement. Processes checked against the BS18001 for compliance.</p> <p>Working with Care Homes to improve safeguarding as evidenced by the CQC regulator report.</p> <p>Risk - When is it going to be completed? ASC safeguarding processes has been reviewed - safeguarding procedures are monitored as part of performance management of care providers.</p> <p>Service plans have been updated for 2010/11 that include updated service level risk registers that reflect actions to address client safeguarding. Recruitment to safeguarding post progressing. One appointment has been made.</p>	

Priority 09: Active, Healthy Citizens

Hot Topics

Health

The Government recently published proposals for public health in a white paper entitled Healthy Lives, Healthy People: Our strategy for public health in England, which sets out the Government's long-term vision for the future of public health in England. The proposals include:

- Creating a 'wellness' service: 'Public Health England', to meet today's health challenges and take responsibility for national health campaigns and epidemic interventions;
 - confirming local arrangements for the Director of Public Health to be employed by the local authority;
 - public health services to be commissioned by Local Authorities or by the NHS, all funded from Public Health England's new public health budget;
 - A new health premium will take into account health inequalities and reward progress on specific public health outcomes; and
- Separate reviews of the regulation of healthcare professionals, which will follow the main white paper.

Priority 09: Summary

Performance Indicators	
Against Target Oct 10	Direction of Travel Oct 10 v Sep 10

Finance	
Variance Nov 10	Direction of Travel Nov 10 v Oct 10

Projects	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

Risk	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

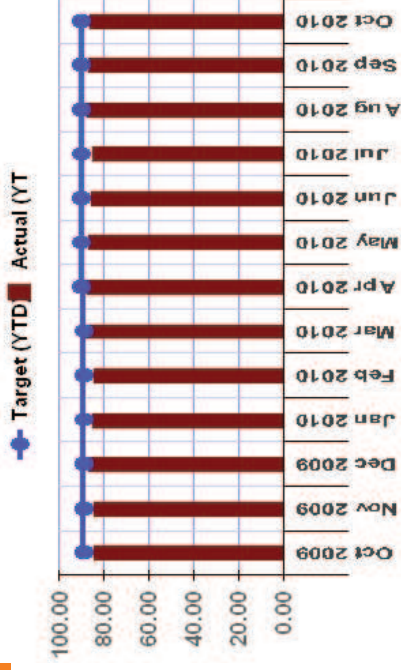
Areas Requiring Management Attention this Month

Performance Indicators - Monthly			
CF/C19 Health of LAC	Against Target	External Benchmark	Direction of Travel Oct 10 v Mar 10
			Direction of Travel Oct 10 v Sep 10

CF/C19 Health of LAC

+ CF/C19 Health of LAC

	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	84.30	89.00	▲
Nov 2009	84.50	89.00	▲
Dec 2009	87.00	89.00	●
Jan 2010	85.00	89.00	●
Feb 2010	84.60	89.00	●
Mar 2010	88.90	89.00	●
Apr 2010	87.60	90.00	●
May 2010	87.00	90.00	●
Jun 2010	85.60	90.00	●
Jul 2010	84.90	90.00	▲
Aug 2010	87.10	90.00	●
Sep 2010	87.00	90.00	●
Oct 2010	85.90	90.00	●



CF/C19 - Comment	
Responsible Officer	Action Plan Comments
Head of Access and Support Services	<p>Performance Performance is in line with the national average but below statistical neighbours. Half of looked after children who did not receive a dental check are over 15 years old and have failed to show for or refused their appointment.</p> <p>Performance Action Plan Appointments, reminders and data collection is in place to ensure the maximum number of children receive health benefits. Work with carers and keyworkers is in place to address poor dental attendance by older young people.</p>

9. Active, Healthy Citizens

Leisure, sporting, learning and creative activities for everyone

9.1 Performance

Priority 9 - Monthly Indicators											
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10		
CF/C19 Health of LAC	85.90	90.00	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️
NI052 Take up of school lunches	51.00	54.00	⬇️	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️
LPI206 Library visits per 1000 pop	7,415.78	7,707.00	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️	⬇️
Priority 9 - Quarterly Indicators											
Unit	YTD Mar 10	Target Mar 10	Against Target Mar 10	DoT Last year	Against External Benchmark (Top band)	DoT Last Month	Against Target Jan 10	Against Target Feb 10	Against Target Mar 10	09/10	
Percentage	78.89	84.00	⬇️	?	⚠️	⬇️	⬆️	⬆️	⬆️	⬆️	⬆️
VS06_05 % women seen midwife or maternity pro by 10 wks 6 days											
Priority 9 - Quarterly Indicators											
Unit	YTD Sep 10	Target Sep 10	Against Target Sep 10	DoT Last year	Against External Benchmark (Top band)	DoT Last Quarter	Against Target Jun 10	Against Target Mar 10	09/10		
Percentage	75.90	73.00	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️	⬆️
NI053 Prevalence of breastfeeding at 6 - 8 weeks from birth											
NI123 Stopping smoking	? 589.90		?	?	?!	?	⬆️	⬆️	⬆️	⬆️	⬆️
LPI324 MMR1 Immunisation rates 2nd birthday	75.90	91.00	⬇️	⬇️	⬇️	⬇️	⬆️	⬆️	⬆️	⬆️	⬆️

9. Active, Healthy Citizens

Leisure, sporting, learning and creative activities for everyone

9.1 Performance

Priority 09 - Volume indicators							
	Unit	YTD Oct 10	YTD Sep 10	YTD Aug 10	YTD Jul 10	09/10	
+	LPI260 Children free swims	44,922	40,073	36,373	25,791	43,571	
+	LPI261 60+ free swims	13,944	12,416	10,571	8,592	18,581	

9. Active, Healthy Citizens

Leisure, sporting, learning and creative activities for everyone

9.2 Projects

Priority 09 projects					
	Directorate	Budget	Est. completion date	Current Status	
PMSCOM Loampit Vale & Pool	Community	£2.59m	Apr 2013	★	
PMSCOM 'Deptford Lounge' - Giffin Street programme	Community	£8.2m	Sep 2011	★	
PMSCOM Leisure 2020	Community	£155k	Jun 2011	★	
PMSCOM Forest Hill Pools	Community	£12.53m	Dec 2012	★	

Priority 10: Inspiring Efficiency, Effectiveness & Equity

Hot Topics

Adverse Weather

During this period of adverse weather Lewisham have launched a new suite of remotely accessible technologies, which are available to all networked staff, to support home working. This includes remote access to SharePoint, My Documents and My Site.

Priority 10: Summary	
Performance Indicators	
Against Target Oct 10	Direction of Travel Oct 10 v Sep 10
Projects	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10
Finance	
Variance Nov 10	Direction of Travel Nov 10 v Oct 10
Risk	
Current Status Nov 10	Direction of Travel Nov 10 v Oct 10

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

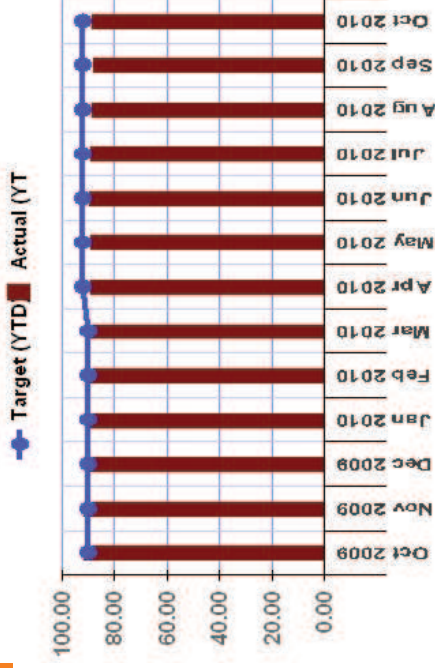
Areas Requiring Management Attention this Month

Performance Indicators				
	Against Target	External Benchmark	Direction of Travel Oct 10 v Mar 10	Direction of Travel Oct 10 v Sep 10
<ul style="list-style-type: none"> ➤ BV008 Invoices paid within 30 days ➤ LPI726 Percentage of calls answered by the call centre within 15 seconds ➤ LPI727 Percentage of visitors seen within 20 minutes 	<ul style="list-style-type: none"> ● ▲ ▲ 	<ul style="list-style-type: none"> ▲ ! ! 	<ul style="list-style-type: none"> ▲ ▲ ▲ 	<ul style="list-style-type: none"> ▲ ▲ ▲
Performance Indicators				
	Against Target	External Benchmark	Direction of Travel Sep 10 v Mar 10	Direction of Travel Sep 10 v Aug 10
<ul style="list-style-type: none"> ➤ LPI519 Number of FOI requests completed 	<ul style="list-style-type: none"> ▲ 	<ul style="list-style-type: none"> ! 	<ul style="list-style-type: none"> ▲ 	<ul style="list-style-type: none"> ▲
Red Risks - Corporate Risk Register				
	Responsible Officer	Current Status		
<ul style="list-style-type: none"> ➤ RMSCOR02 Failure of Central ICT infrastructure ➤ RMSCOR05 Litigation Risks ➤ RMSCOR06 Financial Failure - inability to maintain a balanced budget ➤ RMSCOR21 Data Integrity/Non Compliance 	<ul style="list-style-type: none"> Executive Director of Resources Head of Law Executive Director of Resources Executive Director of Resources 	<ul style="list-style-type: none"> ▲ ▲ ▲ ▲ 		

BV008 % of invoices paid within 30 days

⊕ BV008 Invoices paid within 30 days

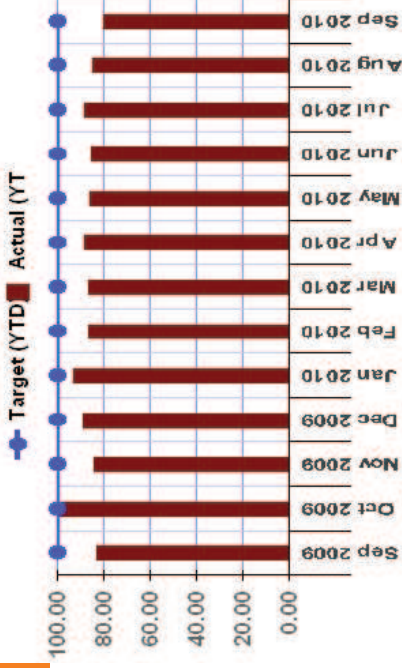
	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	91.31	90.00	★
Nov 2009	91.41	90.00	★
Dec 2009	91.03	90.00	★
Jan 2010	89.51	90.00	●
Feb 2010	89.11	90.00	●
Mar 2010	88.71	90.00	●
Apr 2010	89.00	92.00	●
May 2010	88.88	92.00	●
Jun 2010	89.48	92.00	●
Jul 2010	88.82	92.00	●
Aug 2010	88.61	92.00	●
Sep 2010	88.15	92.00	●
Oct 2010	88.30	92.00	●



BV008 - comment	
Responsible Officer	Action Plan Comments
Head of Shared Services	<p>Performance 89% of Lewisham's commercial invoices were paid within 30 days which is lower than target but an improvement on the September figure.</p> <p>Performance Action Plan Detailed analysis continues to be undertaken to identify the budget holders who are late in submitting invoices for payment. Information will be circulated to the departmental management teams for appropriate action.</p>

LPI519 Number of FOI requests completed in given timescales

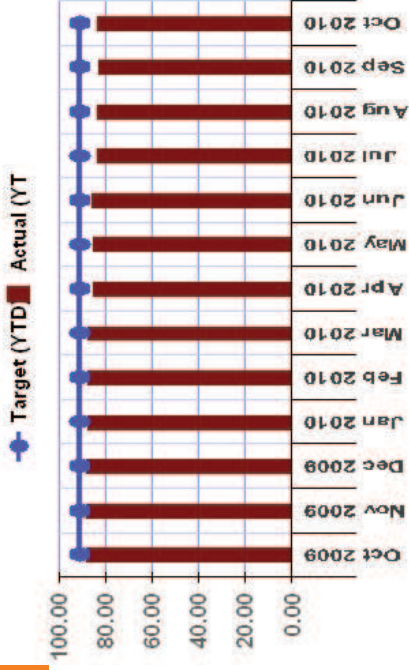
+ LPI519 Number of FOI requests completed			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Sep 2009	83.08	100.00	▲
Oct 2009	98.53	100.00	●
Nov 2009	84.21	100.00	▲
Dec 2009	88.89	100.00	▲
Jan 2010	92.75	100.00	▲
Feb 2010	86.36	100.00	▲
Mar 2010	86.21	100.00	▲
Apr 2010	88.00	100.00	▲
May 2010	85.92	100.00	▲
Jun 2010	85.19	100.00	▲
Jul 2010	88.46	100.00	▲
Aug 2010	84.62	100.00	▲
Sep 2010	80.00	100.00	▲



LPI519 - comment		
Responsible Officer	Performance Comments	Action Plan Comments
Head of Technology & Transformation	<p>Performance The Council received 80 FOI requests in September 2010 which at this point in time for reporting purposes, represents the last 'closed period'. 64 have been closed within the timescales and 10 requests closed out of the statutory timescales, 6 remain open, a compliance rate of 80%.</p>	<p>Performance Action Plan The number of requests has remained fairly steady but the level of support offered by the Information Management Team has dropped this month because of increasing requests for help generally. The Team are taking steps to resolve this which should contribute to an improvement next month. The Team manage output of responses for all directorates to increase compliance and ensure a consistent approach to the application of exemptions. All requests were acknowledged within 3 days.</p>

LPI726 Percentage of calls answered by the call centre within 15 seconds

+ LPI726 Percentage of calls answered by the call centre within 15 seconds			
Percentage			
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	88.16	91.00	●
Nov 2009	88.12	91.00	●
Dec 2009	88.21	91.00	●
Jan 2010	87.47	91.00	●
Feb 2010	87.48	91.00	●
Mar 2010	87.45	91.00	●
Apr 2010	85.45	91.00	▲
May 2010	85.11	91.00	▲
Jun 2010	85.52	91.00	▲
Jul 2010	83.35	91.00	▲
Aug 2010	83.47	91.00	▲
Sep 2010	82.99	91.00	▲
Oct 2010	83.49	91.00	▲

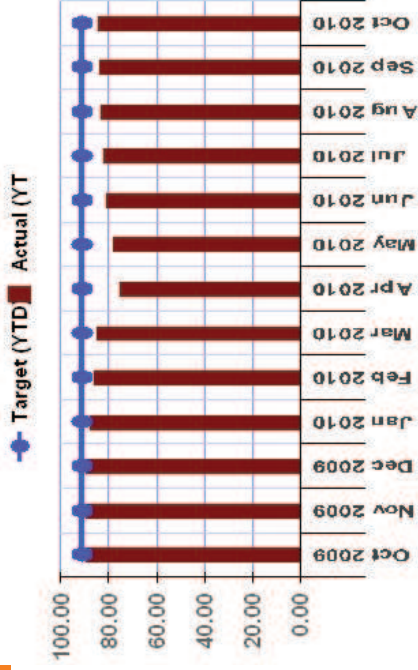


LPI726 - comment		
Responsible Officer	Performance comment	Action Plan Comment
Head of Public Services	<p>Performance At 87.03% performance in October increased by 7% on the previous month, which resulted in a 0.5 percentage point increase in year to date figure (83.49%).</p>	<p>Performance Action Plan The volume of calls received in October was 33% less than in September, which contributed to the improvement. Also October was the first month since July the Telephone system has been stable, with little or no disruption. Trends show that historically there is a decrease in the volume of calls at this time of year and it is expected that this will continue till the after the Christmas period.</p>

LPI727 Percentage of visitors seen within 20 minutes

⊕ LPI727 Percentage of visitors seen within 20 minutes

	Percentage		
	Actual (YTD)	Target (YTD)	Performance (YTD)
Oct 2009	89.03	91.00	●
Nov 2009	89.28	91.00	●
Dec 2009	89.46	91.00	●
Jan 2010	87.82	91.00	●
Feb 2010	86.11	91.00	▲
Mar 2010	84.93	91.00	▲
Apr 2010	75.33	91.00	▲
May 2010	78.19	91.00	▲
Jun 2010	80.72	91.00	▲
Jul 2010	81.94	91.00	▲
Aug 2010	83.13	91.00	▲
Sep 2010	83.56	91.00	▲
Oct 2010	83.96	91.00	▲



LPI727 - comment		
Responsible Officer	Performance comment	Action Plan Comment
Head of Public Services	<p>Performance Performance increased from 85.49% in September to 86.24% in October. Year to date performance is currently at 84% below the target of 91%.</p>	<p>Performance Action Plan Performance in Access Point has remained at the mid 80% mark since July 2010. The Front to back process introduced in Access Point has seen performance on Council Tax steadily improve over the past 6 months and should help improve performance overall in the coming months.</p>

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

10.1 Performance

Priority 10 - Monthly Indicators										
Unit	YTD Oct 10	Target Oct 10	Against Target Oct 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Sep 10	Against Target Aug 10	09/10	
⊕ BV008 Invoices paid within 30 days	88.30	92.00	▲	▶	▲	▶	●	●	●	
⊕ BV012 Days / shifts lost to sickness (Including Schools)	8.71	8.00	▲	▶	!	▶	▲	▲	▲	
⊕ BV016a Disabled employees	4.69	6.50	▲	▶	★	▶	▲	▲	▲	
⊕ BV017a % Ethnic minorities employees	32.62	34.00	●	▶	★	▶	●	●	★	
⊕ LPI031 NNDR collected	105.18	99.40	★	▶	★	▶	★	★	★	
⊕ LPI032 Council Tax collected	92.99	93.50	●	▶	▲	▶	●	●	●	
⊕ LPI500 % staff from ethnic minorities recruited at PO6 and above	?	30.00	?	?	?!	?	▲	▲	▲	
⊕ LPI537 Council jobs gained by young people under 25 as a % of junior level appointments (Sc1-Sc5)	?	27.00	?	?	?!	?	●	★	▲	
⊕ LPI726 Percentage of calls answered by the call centre within 15 seconds	83.49	91.00	▲	▶	!	▶	▲	▲	●	
⊕ LPI727 Percentage of visitors seen within 20 minutes	83.96	91.00	▲	▶	!	▶	▲	▲	▲	
⊕ NI181 Time taken to process Housing Benefit/Council Tax/benefit new claims and change events	5.56	9.00	★	▶	★	▶	★	★	★	
⊕ LPI506 Avg time taken to recruit from advert to offer	35.42	38.00	★	▶	!	▶	★	?	★	
Priority 10 - Monthly indicators										
Unit	YTD Sep 10	Target Sep 10	Against Target Sep 10	DoT Last year	Against External Benchmark (Top band)	DoT Last month	Against Target Aug 10	Against Target Jul 10	09/10	
⊕ LPI519 Number of FOI requests completed	80.00	100.00	▲	▶	!	▶	▲	▲	▲	

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

10.2 Projects

Priority 10 projects					
	Directorate	Budget	Est. completion date	Current Status	
PMSRES Inf. Management & Technology Programme	Resources	£6.98m	Oct 2011		
PMSRES Payroll & HR Information System	Resources	£1.88m	Jan 2011		
PMSRGN Worksmart (In Devel)	Regeneration	£2.1m net	Nov 2010		
PMSCUS Customer Services Transformation	Customer	£4.1m	Mar 2011		
PMSCUS Access Point Redesign (in Devel)	Customer	£613k	Apr 2011		

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

10.3 Risk

Priority 10 - Corporate Risk Register - Red Risks				
Current status				
<p>RMSCOR02 Failure of Central ICT infrastructure</p>				▲
Priority 10 - Corporate Risk Register - Red Risks				
Consequences	DoT Current Quarter v Previous Quarter	Responsible Officer	Comments	
<p>Risk - What are the worst consequences of the risk? Breakdown in service/ performance/ quality delivery. Additional costs. Contractual liability. Litigation. Loss of reputation. Decreased productivity.</p>	<p>▲</p>	Executive Director of Resources	<p>Risk - What are we planning to do? Introduce external device encryption to 1000 priority users. Deploy MSMDM for mobile device management. Recent problems with telephone resolved and apparent stability achieved, but need to monitor closely to assure that this is sustainable. Aim to achieve sustainable stability of telephony by Jan 2011</p> <p>Risk - What have we done to control the risk? Consistent & Regular Monitoring of storage headroom and monitoring and maintenance of network resources. Proactive security approach. Disaster recovery plan/emergency plan in place to provide shadows of all main departmental and corporate systems from alternative site. Back-up facilities in place. Anti-Virus systems updated. Housekeeping maintained. Project completed to ensure no further risk of catastrophic power loss. Recent problems with telephony resolved and stability achieved.</p> <p>Risk Notes E-mail limits imposed on all new users. Process begun to archive storage. Extensive encryption of laptops achieved. The arrangement for business continuity support for major ICT systems have now been substantially reviewed. New arrangements are currently being put in place and the ICT Business Continuity audit will consider these new arrangements.</p>	

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

10.3 Risk

Priority 10 - Corporate Risk Register - Red Risks			
Current status			
RMSCOR05 Litigation Risks			▲
Priority 10 - Corporate Risk Register - Red Risks			
Consequences	DoT Current Quarter v Previous Quarter	Responsible Officer	Comments
<p>Risk - What are the worst consequences of the risk? Litigation. Major Projects Delayed. Negative publicity. Costs. Budget implications. Reputation damage. Higher insurance costs. Lost staff time.</p>	▲	Head of Law	<p>Risk - What are we planning to do? Robust Systems for ensuring professional legal service and legal advice in decision making. Compulsory process for checking decision reports have adequate and timely advice. New legal developments reported to EMT regularly.</p> <p>Risk - When is it going to be completed? Continue with agenda planning & reports to EMT and deliver training programme throughout 09/10. Review Potential Liabilities</p> <p>Risk Notes Several Significant Cases Pending.</p>

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

10.3 Risk

Priority 10 - Corporate Risk Register - Red Risks			
Current status			
<p>RMSCOR06 Financial Failure - inability to maintain a balanced budget</p>			▲
Priority 10 - Corporate Risk Register - Red Risks			
Consequences	DoT Current Quarter v Previous Quarter	Responsible Officer	Comments
<p>Risk - What are the worst consequences of the risk? Budget overspend. Poor DA report. Service cuts.</p>	↑	Executive Director of Resources	<p>Risk - What have we done to control this risk Departmental Expenditure Panels are now in place to help control expenditure and manage this overspend down.</p> <p>Officers have developed possible savings options in line with the timetable previously outlined.</p> <p>Risk - When is it going to be completed? We continue to operate a sound budget monitoring system and associated financial controls.</p> <p>Risk Notes The level of savings required over the next three year planning period will take considerable leadership focus to deliver. Managing the organisational changes required to achieve those savings whilst continuing a strong emphasis on achieving in year financial targets will be challenging.</p>

10. Inspiring Efficiency, Effectiveness and Equity

Ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community

10.3 Risk

Priority 10 - Corporate Risk register - Red Risks			
Current status			
<p>RMSCOR21 Data Integrity/Non Compliance</p>	▲		
Priority 10 - Corporate Risk register - Red Risks			
Consequences	DoT Current Quarter v Previous Quarter	Responsible Officer	Comments
<p>Risk - What are the worst consequences of the risk? Non-compliance with statutory provision. Exposure of confidential information. Service delivery impact. Enforcement by information commissioner. Financial penalty</p>	↑	Executive Director of Resources	<p>Risk - What are we planning to do? Data quality included in all 2010/11 Service Plans. Information Governance have developed the basic information risk management reporting arrangements and processes, and a plan for rollout across the Council.</p> <p>Risk - When is it going to be completed? Likely timescale for rolling out information risk management arrangements is December 2010.</p> <p>Risk Notes Review of End to End process of securing data through scanning process in progress. Data Quality Policy and work plan with programme of data quality audits.</p>
<p>RMSCOR21 Data Integrity/Non Compliance</p>			

Appendix A - Performance Scoring Methodology

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

Performance

Performance can be measured using three methods. First, against an “external benchmark” (usually of other authorities nationally). Second, current performance is appraised against past performance to assess “direction of travel” – is it improving or worsening? Third, performance can be measured against a norm, standard or target.

Areas for management attention are determined by considering performance against the following 3 elements - Against target external benchmark and Direction of Travel (DoT) against the previous years outturn (in this case March 2010). If two or more of these elements are red we consider that the indicator should be flagged as an area for management attention.

The Council has aims and objectives as an organisation responsible for securing local public services. But it also has wider aims to work in partnership with other organisations (in the public, private and community sectors) to improve Lewisham as a place to live. It is therefore essential that our PIs not only measure our organisational and service performance against the Council's corporate priorities but also evaluate our efforts to achieve improvements through partnership working. These wider aims are described in Lewisham's Sustainable Community Strategy. A summary on performance can be found in the 'Overall Performance summary' at front of the Executive Summary report.

Data Quality Policy

The Council has a Data Quality Policy which is adhered to and sets out the corporate data quality objectives. Directorates also have a statement of data quality and a data quality action plan. In addition to this, a corporate data quality risk register is maintained and reported monthly to the Strategic Performance Improvement Group (SPIG).

Appendix B - Projects, Risk & Finance Scoring Methodology

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

Projects

Project status is recorded using a red / amber / green traffic light reporting system.

Red: Projects considered to be at significant risk of late delivery, of overspending or of not achieving their primary objectives. Project likely to be facing issues or uncertainties e.g. funding concerns, lack of clarity over scope / costs, other significant risks not yet under effective control. Sheer scale of a project, its complexity and overall risk level can also attract a red rating.

Amber: Projects considered to be at moderate risk of late delivery, of overspending or of not achieving some objectives. Issues may have been escalated outside the project team, but likely that these can be resolved e.g. resources will be identified to deal with moderate changes to costs or scope.

Green: Project considered to be on time, on budget, with current risks being managed effectively within the project structure.

Risk

The DMTs will identify & analyse potential significant risks in two ways; by the likelihood or frequency of the risk event occurring and by the severity/impact on the organisation of the risk event occurring. The directorate Risk Registers are then scrutinised by the Risk Management Working Party & reported quarterly to the Internal Control Board and will inform the Corporate Risk Register, the annual review and the statement of internal control. Where a priority has any risk deemed to be Red, that priority automatically becomes a Red risk. The status of risks are colour coded according to the adequacy of controls as follows:-

Red: Requires urgent action to manage/correct

Amber: Some controls in place but require improvement

Green: Risk being effectively managed

Finance

Financial monitoring is recorded using a red/amber/green traffic light reporting system.

Net expenditure on the priority is forecast to vary from budget by either:-

Red - more than £0.5m or 2.5%

Amber - more than £0.1m and less than £0.5m or by more than 1% and less than 2.5%

Green - up to £0.1m or up to 1%

The Executive Management Team will take into account:-

- (i) The performance of the housing part of the Capital Programme in assessing the traffic light for Decent Homes;
- (ii) The overall financial position on revenue and capital in assessing the traffic light for 'Inspiring Efficiency, Effectiveness & Equity'.

The methodologies for Projects, Risk and Finance outlined above will be reviewed annually at the end of the financial year as part of the review of this report and the target setting process for performance indicators. The text above will be subject to change at this point.

Chief Officer Confirmation of Report Submission			
Cabinet Member Confirmation of Briefing			
Report for:	Mayor	<input type="checkbox"/>	
	Mayor and Cabinet	<input checked="" type="checkbox"/>	
	Mayor and Cabinet (Contracts)	<input type="checkbox"/>	
	Executive Director	<input type="checkbox"/>	
Information	<input type="checkbox"/> Part 1	<input type="checkbox"/> Part 2	<input type="checkbox"/> Key Decision

Date of Meeting	19 th January 2011
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Title of Report	Results of Ofsted's annual unannounced inspection of children's contact, referral and assessment arrangements
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Originator of Report	Ian Smith, Director of Children's Social Care	Ext. 48140
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At the time of submission for the Agenda, I confirm that the report has:

Category	Yes	No
Financial Comments from Exec Director for Resources	X	
Legal Comments from the Head of Law	X	
Crime & Disorder Implications	X	
Environmental Implications	X	
Equality Implications/Impact Assessment (as appropriate)	X	
Confirmed Adherence to Budget & Policy Framework	X	
Risk Assessment Comments (as appropriate)	X	
Reason for Urgency (as appropriate)		

Signed:  Executive Member

Date: 10/01/2011

Signed:  Director/Head of Service

Date: 10/01/2011

Control Record by Committee Support

Action	Date
Listed on Schedule of Business/Forward Plan (if appropriate)	
Draft Report Cleared at Agenda Planning Meeting (not delegated decisions)	
Submitted Report from CO Received by Committee Support	
Scheduled Date for Call-in (if appropriate)	
To be Referred to Full Council	

MAYOR AND CABINET

Report Title	Results of Ofsted's annual unannounced inspection of children's contact, referral and assessment arrangements		
Key Decision	No		Item No. 15
Ward	All		
Contributors	Executive Director for Children and Young People		
Class	Open	Date: 19 January 2011	

1 Purpose

- 1.1 This report and attachment informs Mayor and Cabinet of the results Ofsted's annual unannounced inspection of contact, referral and assessment arrangements within the Council's children's services.
- 1.2 The inspection was carried out on the 16th and 17th November 2010 and is part of the arrangements Ofsted introduced in 2009/10. This is the second unannounced inspection that has been undertaken in Lewisham following a previous unannounced inspection on the 2nd and 3rd March 2010. On this latest occasion the inspection involved two on-site inspectors undertaking case auditing and interviewing of social workers and managers. The Inspectors examined 37 cases in detail and their conclusions reflect this investigation.
- 1.3 The attached letter with the results of the inspection details two strengths and two areas for development. There were no areas requiring priority action identified by the inspectors.
- 1.4 The attached letter was published on Ofsted's website on 15 December 2010.

2 Recommendation

- 2.1 The Mayor is asked to note the results of Ofsted's annual unannounced inspection of contact, referral and assessment arrangements within Lewisham children's services as detailed in the letter attached to this report.

3 Financial Implications

- 3.1 There are no financial implications from this report.

4 Legal Implications

- 4.1 The inspection was carried out under section 138 of the Education and Inspections Act 2006.

5 Equalities Implications

- 5.1 There are no direct equalities implications from this report.

6 Crime and disorder Implications

- 6.1 There are no direct or indirect Crime and Disorder implications arising from this report.

BACKGROUND PAPERS

Letter dated 15 December 2010 from C. Sands, Her Majesty's Inspector, Ofsted to Frankie Sulke, Executive Director for Children and Young People, London Borough of Lewisham.

If there are any queries on this report, please contact Ian Smith on 0208 314 8140

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MAYOR & CABINET			
REPORT TITLE	Setting the Council Tax Base & Discounts for Second Homes and Empty Properties		
KEY DECISION	Yes		ITEM NO. 15
WARD	All		
CONTRIBUTORS	Executive Director for Resources; and Executive Director for Customer Services		
CLASS	Part 1	Date	19 January 2011

1 EXECUTIVE SUMMARY

- 1.1 This report sets out the statutory calculation required in order to set the Council Tax Base for 2011/12, in accordance with the Local Authorities (Calculation of Council Tax Base) regulations 1992, as amended. In addition, the report recommends that the Council Tax Base for 2011/12 be agreed at 88,486.96, based on an assumed collection rate of 96.25%.

2 RECOMMENDATIONS

The Mayor is recommended to agree:

- 2.1 To recommend that the Council at its meeting on 24 January 2011, agree a Council Tax Base of 88,486.96 for 2011/12; and
- 2.2 To continue the current local policy on discounts, with the minimum discount of 10% for second homes and 0% for empty dwellings for 2011/12.

3 POLICY CONTEXT

- 3.1 The Council is required to inform the Greater London Authority of its 2011/12 Council Tax Base by 31 January 2011.

4 COUNCIL TAX BASE

- 4.1 Calculation of the Council Tax (the tax) is governed by the Local Government Finance Act 1992 (LGFA 1992) and various regulations there under. In particular, Section 33(1) of the Act requires the basic (Band D) tax to be calculated by applying the formula:

$$(R - P) / T$$

R is the Council's 2011/12 Budget Requirement

P is the estimate of the amounts payable to the Council in 2011/12 in redistributed non-domestic rates, revenue support grant, any additional grant and any estimated net surpluses (or deficits) on the Collection Fund

T is the Council's 2011/12 Tax Base

- 4.3 Although the Council's net budget requirement (R above) cannot yet be determined, the 'tax base' (T) can and is subject to the Local Authorities (Calculation of Council Tax Base) Regulations 1992, made under section 33 of the Act and the Local Authorities (Calculation of Council Tax Base) (Amendment) England Regulations 1999. Regulation 8 of the 1992 Regulations requires the calculation to be made some time between 1 December 2010 and 31 January 2011.
- 4.4 The Council's Tax Base is a measure of the Authority's ability to raise revenue from local taxation, the remainder of the Council's budget being funded by Central Government through Formula Grant (Revenue Support Grant and National Non-Domestic Rates). Prior to the commencement of the year, Formula Grant is calculated so as to compensate Local Authorities for differences in their taxbase. If the taxbase is reduced for any reason, Lewisham's budget requirement will be divided over a smaller nominal number of taxpayers, resulting in a higher Council Tax.
- 4.5 The calculation of the Council's Taxbase 'T' can be expressed as the 'Relevant Amounts' (known as 'A') for each valuation band multiplied by the collection rate (known as 'B'). In summary, 'Relevant Amounts' are to be calculated as the number of dwellings on the valuation list supplied by the Inland Revenue adjusted for discounts, disabled person reductions and anticipated changes to the list during 2011/12. The detailed calculation of the 'Relevant Amount' for each valuation band for 2011/12 has been set out at Appendix A.
- 4.6 The proportions applicable to the various council tax bands (the 'basic' band being D) are as follows:-

Band	Proportion (ninths)
A	6
B	7
C	8
D	9
E	11
F	13
G	15
H	18

- 4.7 The Council's basic tax is calculated in respect of Band D. Therefore, Band A properties pay 6/9 of the basic tax, Band B properties 7/9 of the basic tax and so on, up to Band H where the tax is 18/9 or twice the tax at Band D.

- 4.8 The 'Relevant Amounts' for each Band for 2010/11 are summarised in the table below. This is based on the number of chargeable dwellings being 113,568 . This is an increase of 1,245 properties from the 112,323 chargeable dwellings recorded for 2010/11.

Band	Relevant Amount
A	3,746.4
B	20,233.9
C	31,322.4
D	22,583.3
E	8,027.9
F	3,693.8
G	2,021.3
H	305.5
Aggregate of Relevant Amounts	91,934.5

- 4.9 The aggregate of 'Relevant Amounts' expressed as a Band D equivalent for 2011/12 is therefore 91,934.5.
- 4.10 To set a 96.25% collection rate, the statutory calculation of the 2011/12 Council Tax Base is:

A	Aggregate of Relevant Amount	91,934.5
B	multiplied by the Collection Rate	x <u>96.25%</u>
T	equals the Council Tax Base	<u>88,486.96</u>

5 CHANGES TO DISCOUNTS

- 5.1 The Council has local discretion, granted under the Local Government Act 2003 (LGA 2003), in setting the discount for homes counted as long term empty and second homes. These are currently:-

Discount category	Percentage awarded	Local / statutory
Single Person	25%	Statutory
All except one household member disregarded	25%	Statutory
All persons in household disregarded	50%	Statutory
Second Home	10%	Local
Long-term empty	0%	Local

- 5.2 The Council has the power under the LGA 2003 to have other local discounts. Discounts could be granted either to individuals or to classes of individuals. However, there are financial implications to awarding any discounts other than those currently available. Not only would there be an increase in the general level of Council Tax for other payers, but the complication and cost of administering Council Tax would increase.

- 5.3 It is recommended that the Council only award discounts to the categories listed in the above table.

6 FINANCIAL IMPLICATIONS

- 6.1 When considering an assumed collection rate of 96.25% for 2011/12, officers have undertaken a review of the accrued collection rates from 2000 to 2010. The results of this review are attached at Appendix B.
- 6.2 As in previous year, serious consideration has been given to the current economic climate. Whilst it was difficult to predict the scale of the ongoing impact, it remains inevitable that Councils and residents across the country continue to be affected in some way by the current economic climate.
- 6.3 Residents continue to be concerned about their household finances with many still experiencing financial difficulties and the prospects of further redundancies and property repossessions in during 2011/12.
- 6.4 The Council Tax section will continue to apply a firm but fair approach when dealing with customers in arrears, in line with the Corporate Collection Policy.
- 6.5 The bad debt provision for 2011/12 has been reviewed and a decision has been taken to maintain an appropriate level of provision as a result of the current economic climate. Officers believe that a collection rate of 96.25% for 2011/12 is reasonable, based on the actual debt that has been collected since 2000.
- 6.6 Appendix B provides a detailed summary of the collection result since 2000. As illustrated it takes approximately 6 years on average to attain the budgeted percentage. This is viewed as a realist target based on past performance.

7 LEGAL IMPLICATIONS

- 7.1 Under the LGFA 1992 and Regulations made under it, the Authority is required to decide its Council Tax Base for 2010/11 by no later than 31 January 2011. Section 67 of the 1992 Act reserves to full Council, the decision on the level of the Council Tax.
- 7.2 The Local Government Act 2000 and Regulations made under it say that the responsibility of the Executive in connection with the discharge of the function of calculation of the Council Tax under Sections 32 to 37 LGFA 1992 is limited to the preparation of estimates of the amounts to be taken into account in the Tax Base calculation for consideration by the Authority in fixing that Tax Base.

8 CRIME AND DISORDER IMPLICATIONS

- 8.1 There are no specific crime and disorder implications directly arising from this report.

9 EQUALITIES IMPLICATIONS

- 9.1 Every effort will be made to ensure that Council Tax payers, particularly those who are from traditionally disadvantaged groups, receive prompt and accurate Council Tax bills, and that those who are eligible for exemptions and discounts - such as the disabled, single people, those on low incomes, are encouraged to claim them.

10 ENVIRONMENTAL IMPLICATIONS

- 10.1 There are no specific environmental implications directly arising from this report.

11 CONCLUSION

- 11.1 The recommended Council Tax Base takes account of the 'relevant amounts' for each council tax band and a considered view of the likely collection rate.

For further information on this report, please contact Selwyn Thompson, Group Manager, Budget Strategy on 0208 314 6932 or Lorraine Richards, Revenues Manager on 0208 314 6047.

COUNCIL TAX BASE CALCULATION OF RELEVANT AMOUNT

APPENDIX A

CTB(October 2010) form for : Lewisham										
<i>Completed forms should be received by CLG by Friday 15 October 2010</i>										
Dwellings shown on the Valuation List for the authority on Monday 13 September 2010	Band A entitled to disabled relief reduction COLUMN 1	Band A COLUMN 2	Band B COLUMN 3	Band C COLUMN 4	Band D COLUMN 5	Band E COLUMN 6	Band F COLUMN 7	Band G COLUMN 8	Band H COLUMN 9	TOTAL COLUMN 10
1. Total number of dwellings on the Valuation List		7,192	32,025	41,112	25,182	7,170	2,751	1,296	176	116,904
Explanation has been added										
2. Number of dwellings on valuation list exempt on 4 October 2010 (Class A to W exemptions)		330	1,230	1,097	484	131	41	16	3	3,332
3. Number of demolished dwellings and dwellings outside area of authority on 4 October 2010 (please see notes)		0	1	3	0	0	0	0	0	4
Explanation has been added										
4. Number of chargeable dwellings on 4 October 2010 (treating demolished dwellings etc as exempt) (lines 1-2-3)		6,862	30,794	40,012	24,698	7,039	2,710	1,280	173	113,568
5. Number of chargeable dwellings in line 4 subject to disabled reduction on 4 October 2010		8	37	100	106	47	24	17	10	349
6. Number of dwellings effectively subject to council tax for this band by virtue of disabled relief (line 5 after reduction)	8	37	100	106	47	24	17	10		349
7. Number of chargeable dwellings adjusted in accordance with lines 5 and 6 (lines 4-5+6 or in the case of column 1, line 6)	8	6,891	30,857	40,018	24,639	7,016	2,703	1,273	163	113,568
8. Number of dwellings in line 7 entitled to a single adult household 25% discount on 4 October 2010	4	4,993	18,651	18,249	7,674	1,607	447	156	11	51,792
9. Number of dwellings in line 7 entitled to a 25% discount on 4 October 2010 due to all but one resident being disregarded for council tax purposes	0	36	331	468	307	66	30	7	0	1,245
Explanation has been added										
10. Number of dwellings in line 7 entitled to a 50% discount on 4 October 2010 due to all residents being disregarded for council tax purposes	0	1	6	14	27	28	48	38	15	177
11. Number of dwellings in line 7 classed as second homes and so treated for Formula Grant purposes as being entitled to a 50% discount on 4 October 2010 (even if a lower discount has been granted in practice).		39	187	188	94	31	5	1	0	545
0										
12. Number of dwellings in line 7 classed as long-term empty and receiving a 50% discount on 4 October 2010		0	0	0	0	0	0	0	0	0
13. Total number of dwellings in line 7 entitled to a 50% discount for Formula Grant purposes on 4 October 2010 (lines 10+11+12)	0	40	193	202	121	59	53	39	15	722
14. Number of dwellings in line 7 classed as long-term empty and receiving zero% discount on 4 October 2010		102	298	273	180	45	24	16	4	942
Explanation has been added										
15. Number of dwellings in line 7 classed as long-term empty and receiving between zero% and 50% discount on 4 October 2010. Please enter % discount here (please see notes):	40.0									0
16. Number of dwellings in line 7 where there is liability to pay 100% council tax (lines 7-8-9-13-15)	4	1,822	11,682	21,099	16,537	5,284	2,173	1,071	137	59,809
17. Total equivalent number of dwellings after discounts, exemptions and disabled relief (to 2 decimal places) [(line 8 x 0.75) + (line 9 x 0.75) + (line 13 x 0.5) + line 15 x ((100 - % discount)/100) + line 16]	7.00	5,613.75	26,015.00	35,237.75	22,583.25	6,568.25	2,557.25	1,212.75	152.75	99,948
18. Ratio to band D	5/9	6/9	7/9	8/9	9/9	11/9	13/9	15/9	18/9	
19. Number of band D equivalents (to 1 decimal place) (line 17 x line 18)	3.9	3,742.5	20,233.9	31,322.4	22,583.3	8,027.9	3,693.8	2,021.3	305.5	91,934.5
20. Number of band D equivalents of contributions in lieu (in respect of Class O exempt dwellings) in 2010-11 (to 1 decimal place)										0.0
21. Tax base for Formula Grant purposes (to 1 decimal place) (line 19 col 10 + line 20)										91,934.5

COUNCIL TAX COLLECTION RATES 2003/04 TO 2009/10

APPENDIX B

Relevant Council Tax Year	Total Collected	Gross Debit	Percentage Collected	Percentage Budgeted
	£'000	£'000	%	%
2009/10	116,676	121,956	95.67	96.25
2008/09	114,146	119,095	95.84	96.25
2007/08	111,313	115,876	96.06	96.25
2006/07	107,281	111,982	95.80	96.25
2005/06	103,310	106,364	97.13	96.18
2004/05	97,973	101,215	96.80	96.18
2003/04	91,742	94,351	97.24	96.35

The above amounts represent the rates of collection over a number of years.

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MAYOR AND CABINET		
Report Title	Strategy to deliver Primary Places	
Key Decision	Yes	Item No.
Ward	All	
Contributors	Executive Director CYP, Executive Director Regeneration, Executive Director Resources, Head of Law	
Class	Part 1	24th February 2010

1 Executive Summary

- 1.1 This report reviews immediate and longer term demand for primary places in Lewisham projected to 2019/20 against current provision and capacity to meet demand. The report considers the implications for the future strategic development of the primary mainstream and primary Special Educational Needs (SEN) school estate, and within this context, considers what the next steps should be to ensure the supply of sufficient primary places at the right time in the right Lewisham localities.
- 1.2 The report goes on to recommend amendments to decisions on the use of capital resources made by the Mayor at the Mayor and Cabinet meeting of 28 May 2008.

2 Recommendations

- 2.1 That the Mayor notes the description of current and projected demand for and supply of primary mainstream and SEN places, and its strategic implications.
- 2.2 That, in the light of feasibility work carried out subsequently, the Mayor agrees to revoke the following decisions made at the Mayor and Cabinet meeting of 28 May 2008, namely:
 - 2.2.1 an expansion of Our Lady & St Philip RC Primary School from 1.5 fe to 2 fe and of St Bartholomew's CE Primary School from 1.5 fe to 2 fe (subject to feasibility);
 - 2.2.2 the following schools to be held in reserve (subject to feasibility) for capital expenditure in relation to feasibility studies on Our Lady & St Philip RC Primary School and St Bartholomew's CE Primary School:
 - An expansion of Dalmain Primary School from 1.5 fe to 2 fe;
 - An expansion of Kilmorrie Primary School from 1.5 fe to 2 fe;

- 2.3 That the Mayor agrees that the balance of c.£1.5m of Council funding be used to contribute to the capital required to provide additional primary places, including specialist SEN places, for 2010-11 and 2011-12. This represents the difference between the £23.6m approved by the Mayor and the costs of the Gordonbrock and Brockley projects together with the reduction in LCVAP, Diocesan and governing body contributions resulting from approval of recommendation 2.2.1.
- 2.4 That the Mayor agrees that officers should subsequently bring recommendations for future consideration by the Mayor of any major expenditure of capital resources for the provision of primary mainstream and/or SEN places.

3 Policy Context

- 3.1 The Local Authority has a duty to ensure the provision of sufficient places for pupils of statutory age and, within financial constraints, accommodation that is both suitable and in good condition.
- 3.2 In aiming to improve on the provision of facilities for primary education in Lewisham which are appropriate for the 21st century, the implementation of a successful primary places strategy will contribute to the delivery of the corporate priority *Young people's achievement and involvement: raising educational attainment and improving facilities for young people through partnership working* and, at the same time, contributing to the corporate priority of *ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community*.

4 Background

The Primary Capital Programme and Lewisham's Primary Strategy for Change

- 4.1 At the Mayor and Cabinet meeting of 25 May 2008, the Mayor considered a report on the framework for Lewisham's *Primary Strategy for Change and Primary Capital Programme*. As outlined in that report, all Local Authorities were required to produce a *Primary Strategy for Change* (PSfC) in order to access the first tranche of funding (2009-11) of the government's 14 year *Primary Capital Programme* (PCP).
- 4.2 The Government had announced in 2005 its intention to renew up to half of the primary school estate in England to parallel the *Building Schools for the Future* (BSF) programme for secondary schools. The Government pledged an initial £1,150 million extra resources for this programme from 2008 to 2011, and committed to continue that level of investment for up to 15 years in total, subject to future public spending decisions. After the first pilot year (2008-09) all Local Authorities would be eligible for funding.
- 4.3 In October 2007 the Government gave the details of capital funding for the 2008-11 spending review period, including increased investment in 2008-11

for the PCP to £1,900 million, and from 2011-12 to 2023-24, £500 million a year, subject to public spending decisions.

- 4.4 The PCP's stated aims are to *support the delivery of the Children's plan by:*
- *creating primary schools equipped for 21st century learning, at the heart of the community, with a range of children's services in reach of every family;*
 - *delivering a strategic approach to capital investment - supporting national policy aims, delivering world class standards, access to joined-up services for children and families; and addressing local needs and priorities;*
 - *rebuilding, remodelling or refurbishing at least half of all primary schools, including rebuilding or taking out of use at least 5 per cent of school buildings in the worst physical condition (higher for the most deprived communities);*
 - *focusing resources on deprivation nationally and in every authority; and*
 - *reconfiguring the primary capital stock to account for demographic change.*
- 4.5 The PCP therefore requires a borough-wide strategy to improve the suitability and condition of schools, develop facilities that are more economic to run, and better enable the provision of a range of extended services. All primary schools are eligible, including VA foundation and Trust schools (funding for VA schools at the usual 90% rate) and special schools with primary-age children.
- 4.6 Funding allocation is by formula based on the number of primary pupils and deprivation, with a floor to protect smaller authorities. The expectation is that, for each 3 year tranche of funding, added impact will be made through Local Authorities contributing eligible capital from other government departments and local resources.
- 4.7 The national target is to impact on at least 50% of each Authority's estate, including the replacement of at least 5%. However, along with a number of other Authorities with similar profiles, in acknowledgement of Lewisham's high indices of social deprivation and poor building stock, a condition of our successful bid was the requirement that over the programme period we replace at least 15% of our existing estate most in need of renewal. For Lewisham this means 10/11 schools.
- 4.8 Over its 14 year period, the programme therefore aims to replace or refurbish an Authority's primary estate, rather than to provide for new places (Basic Needs). Indeed for many Authorities it was envisaged that this would involve a reduction in their primary estate in acknowledgement of reduced demand.
- 4.9 However, in its bid Lewisham was prudent in taking account of the pressure on places already evident through its then most recent projections (March 2008). It therefore made one of its criteria for PCP investment in the first tranche of funding *the provision of sufficient places at the right time to meet future needs within and between Primary Places Planning Localities (PPPLs) in the Borough.* As articulated in Lewisham's June 2008 PSfC:

“Ensuring that sufficient places are provided in localities at the right time will take precedence over significant investment in schools where the rectification of conditions and suitability issues will not produce additional places. “

- 4.10 As a result, the recommendation on Tranche 1 (2009-11) investment to the Mayor at the Mayor and Cabinet meeting of 28 May 2008 reflected the prediction of the most urgent pressures being in PPPL 3 (Brockley, Lewisham, Telegraph Hill) and PPPL 1 (Sydenham/Forest Hill).
- 4.11 Following the PCP guidance, and bearing in mind the significant investment needs of our primary schools, for Tranche 1 officers also recommended a £12.5m increase from other resources to make available a total budget £23.6m, which more than doubled the PCP grant of £11.1m. This increase consisted of Basic Need Supported Capital Borrowing (£9.6m), Extended Services Grant (£0.7m), Schools’ Devolved Formula Capital grant (£0.5m), Diocesan 10% contribution (£0.5m) and LCVAP (£1.2m).
- 4.12 At the meeting of 28 May 2008 the Mayor:
- i) noted the revision of the projections in the Mayor and Cabinet report of 16 January 2008 on the need for primary places in each of the 6 planning localities approved by the Mayor;
 - ii) agreed the framework for the Primary Strategy for Change and its contents at Paragraph 5 of the report;
 - iii) agreed, as part of the Primary Strategy for Change, and subject to feasibility work, the proposals for expenditure of a first tranche of capital funding over the period 2009-11 up to a limit of £23.6 million (including up to £9.6 million of Basic Need Supported Capital) on the following schools:
 - a. A new build (or refurbishment) of Gordonbrock Primary School expanded from 2.5 fe to 3fe;
 - b. A new build of Brockley Primary School expanded from 1fe to 2fe;
 - c. An expansion of Our Lady & St Philip RC Primary School from 1.5 fe to 2 fe and of St Bartholomew’s CE Primary School from 1.5 fe to 2 fe;
 - d. The following schools to be held in reserve (subject to feasibility) for capital expenditure in relation to feasibility studies on Our Lady & St Philip RC Primary School and St Bartholomew’s CE Primary School:
 - i. An expansion of Dalmain Primary School from 1.5 fe to 2 fe;
 - ii. An expansion of Kilmorie Primary School from 1.5 fe to 2 fe;
 - iv) instructed officers to investigate the potential to realise further capital resource through disposal of elements of primary school sites, subject to this not jeopardising the potential for further expansion of pupil numbers;
 - v) delegated to the Executive Director for Children and Young People and to the Executive Director for Resources, in liaison with the Cabinet Member for Children and Young People, the responsibility for finalising and submitting the Primary Strategy for Change to the DCSF by 16 June;
 - vi) noted the results of ongoing consultation with stakeholders.
- 4.13 The Mayor also agreed the recommendations made by the Children and Young People’s Select Committee that:
- vii)
 - (a) A thorough risk analysis of the potential sale of assets is carried out before any such action is taken;

- (b) Consider the Primary Strategy for Change and Primary Capital Programme in conjunction with the SEN review to ensure that, in line with the SEN inclusion strategy, consideration of the needs of SEN children is mainstreamed across the Primary Strategy for Change and Primary Capital Programme;
 - (c) Carefully monitor the primary places statistics across the length of the programme to ensure actual need matches projected need, and swiftly review the programme in light of that need;
 - (d) Carefully consider the potential difficulties of the proposal to expand two church schools in the Sydenham/Forest Hill locality;
 - (e) Consider the impact of the programme on the quality of teaching in those schools affected and ensure that clear plans are in place to ensure that high quality teachers are secured and integrated into existing school staff teams, to ensure that the focus on providing a high quality education is maintained when the number of children and teachers rises at a rapid rate.
- 4.14 In providing the framework for the Lewisham PSfC for approval by the Mayor, the report of 25 May 2008 updated projections in the Mayor and Cabinet report of 16 January 2008 on the need for primary places in each of the 6 PPPLs. As requested by the Mayor, planned housing developments which were not yet approved were included in the later report to give a more accurate prediction of the need for places in specific localities.
- 4.15 The 28 May 2008 report also used the updated (March 2008) GLA school roll projections for 2004-2017 which were not available at the time of the January report, and which indicated a significantly higher level of future need for places across Lewisham. The report then went on to set out the criteria for matching need to provision and applied those criteria to describe how capital provision might best be matched to need in each of the 6 Lewisham PPPLs over the period 2009-17.
- 4.16 A review of projected demand for primary places within the PSfC was a condition of PCP grant, together with a description of how that demand would be met. The data and analyses contained in the report of 25 May 2008 provided the basis of the PSfC submitted by the Authority in June 2008. This comprehensive strategy document sets out the Authority's approach to change, its long term plans and its decisions on the expenditure of a first tranche of capital grant within the context of the government's 14 year programme (See Appendix 1).
- 4.17 In November 2008 Lewisham received notification from the DCSF that its PSfC had been unconditionally approved, and its indicative allocation for 2009-10 and 2010-11 of £11.1 million confirmed.
- 4.18 As a result of feasibility work on proposed permanent increases in the other two primary schools approved for expansion, Our Lady and St.Philip Neri and St Bartholomew's, it is recommended that, as neither of these schemes provides value for money against the criteria set out in the Lewisham PSfC they should be discontinued. Estimated costs were c. £4.4m for the St Bartholomew's scheme and £5.3m for Our Lady and St.Philip Neri to produce half a form of entry in each case against indicative budgets of £2.5m. Against

all the criteria used to assess the 15 feasibility studies St. Bartholomew's ranked 9th and Our Lady & St Philip Neri ranked 12th.

5. Primary places in Lewisham: general trends in demand and supply implications 2010-2020

- 5.1 As set out in the 28 May 2008 Mayor and Cabinet report and in greater detail in Lewisham's June 2008 Primary Strategy for Change, demand for primary places in Lewisham has been growing significantly from 2008-09. The Reception cohort increased from its low point of 2,776 in 2005-06 to 3,123 in 2008-09 (just below the Borough PAL), and to 3302 in 2009-10 which is 5fe above PAL.
- 5.2 In all PPPLs, Reception places in mainstream schools have been full or nearly full since 2008-09, and pressure is set to continue over succeeding years. From 2008-09, therefore, the more important Lewisham statistics relate to surpluses of (and over-demand for) Reception places, rather than existing overall school surpluses which, where they exist, have already begun to diminish, and will continue rapidly to do so over the next five years.
- 5.3 Lewisham uses three trend line projections for its primary places planning for the whole Borough and for each PPPL: low, a "weighted average", and high, dependent on the percentage conversion rates between known birth rates and assumed Reception admissions, and, for longer projections, on population data.
- 5.4 The latest 2010 birth and GLA data indicate that, at different rates and with some fluctuations, demand will continue to rise above current levels at least until the end of the decade in all six Primary Places Planning Localities (PPPLs) Lewisham uses to plan its supply of places.
- 5.5 Although 2009-10 Reception numbers outstripped even the "high" prediction, applications received as of the end of January 2010 indicate that the "high" prediction for 2010-11 may have forecast overall demand with reasonable accuracy, but that demand per locality may differ from that predicted. The data indicate that the overall gap will widen from 5fe in 2009-10 to around 15fe in 2010-11. Although demand is forecast on the "high" prediction to increase slightly further in 2011-12 to 16.5fe, the gap would reduce to 15fe because of the additional 1.5fe to be delivered in September 2011 at Brockley and Gordonbrock through their new builds.
- 5.6 In 2012-13 the gap is forecast to expand to 600 places on the "weighted average" projection, which after taking account the additional 1.5fe provision in place by that time at Brockley and Gordonbrock, will mean an overall pressure of 18.5 fe (rising to 20.5fe for the "high" projection). After a reduction to 16.5fe in 2013/14, "weighted average" pressure is forecast then to plateau at between 18.5fe and 21fe until at least 2019-20, with the "high" prediction around 1fe higher.
- 5.7 After peaking in 2012-13, demand in most localities should decline and then flatten off, whilst remaining well above current levels. However, in PPPL5

(New Cross and Deptford) the rise from 2013-14 onwards will be very significant, and will not have peaked by 2019-20, reflecting anticipated housing developments. PPPL6 (Downham), which previously was forecast to have flat demand, should have a modest 2fe increase in demand in 2013-14, flattening to an additional 1fe demand for the remainder of the decade.

- 5.8 Given the predictions of rising continued demand for primary places for children with and without Special Educational Needs, the provision of permanent places is a more appropriate response than the incremental provision of “bulge” classes. However, the necessary capital is not currently available to convert any of these into permanent increases in schools’ published admissions limits from 2011-12 onwards, or to invest in other projects in order to help to meet the predicted surge in 2012-13 and the sustained demand for Reception places over the rest of the decade.
- 5.9 Whilst Lewisham received a first tranche of PCP funding of £11.1m for the spending period 2009-11, in the current economic climate, and given the imminence of a general election, there is no surety that the commitment of the current government to PCP funding over the timescale and at the level set out in this report in Paragraphs 4.2 and 4.3 will be sustained from 2011 onwards, or indeed whether the PCP will continue at all.
- 5.10 Lewisham has already committed £9.5m of “supported borrowing” to the first tranche of the PCP, and it is unlikely that it will be able to commit further significant capital which would be required to create additional permanent places.
- 5.11 In this context, it is very regrettable that in November 2009, Lewisham was refused extra funding by the government from its “safety valve” initiative
- 5.12 After intensive lobbying from local government, in July 2009 the government announced that up to £200m would be made available to Local Authorities experiencing unpredicted pressures on primary pupil places. The criteria limited eligibility at that time to those Authorities with more than 15% growth in Reception class numbers between 2008 and 2011, of which Lewisham is one. The funding was made available to be spent on the provision of permanent places, not “bulge” classes, with at least the Reception age group in any projects taking up the extra places created by September 2011.
- 5.13 The original bids for this funding (including Lewisham’s) were submitted to the DCSF in mid-August 2009. Despite the total available grant being subsequently raised to £300m, Lewisham’s bid was rejected in late November 2009 for two linked reasons. Firstly, in making its assessment of an Authority’s need for additional funding, the DCSF included surplus places in any year groups (Years Reception to 6) from September 2008 to September 2011, rather than restricting its calculations to Reception and Years 1 and 2. Lewisham loses out because it currently has a significant number of surplus places in its schools from Year 2 to Year 6, whereas our demand for 2008-09 and 2009-10, and projections to 2011 (and beyond) is mainly for Reception places.

- 5.14 The second factor relates to the presumed use of an Authority's existing capital resources to meet its statutory duty to provide sufficient primary places. In short, the DCSF thinks the Authority has received enough money in the 2008-11 spend period to meet its additional demand for Reception places from its Basic Need, New Deal for Schools and the Schools Access initiative funding. The Council disputes this. Against £15.75m presumed by the DCSF to be available to meet Lewisham's additional pressure on primary places, Lewisham has in fact spent or committed £17m through supported borrowing.
- 5.15 Committed spend includes a £9.6m contribution (supported borrowing) to our PCP for the rebuild of Gordonbrock and Brockley Primary Schools, which generate an extra 1.5 forms of entry. In addition, almost £2m is supporting the development of our Primary SEN Resource Bases. Lastly, £4.6m is committed to keeping our schools repaired and maintained, without which expenditure we would be in danger of closing existing schools.
- 5.16 The assumptions from the DCSF seem to be that:
- The LA should have already got rid of surplus places, which would have involved us in closing schools and would place us now in a far worse position to meet our pressures on primary places which are projected to continue into the next decade.
 - We should stop our current primary rebuild commitments and switch funding to schemes that would produce more primary places. This would mean halting the rebuilding of Brockley and Gordonbrock which are due to be delivered for September 2011, and leave us with even more repair bills and the threat of closure because of their dilapidation.
 - To meet our huge Reception demand we should reorganise our schools with surplus places in Key Stage 2 into classes with up to 3 or 4 age groups in any one class. As an example, this would mean that in a school with four KS2 classes each with 24 children (96 children and a surplus of 24 places), they might be organised into two classes of 32 Years 3-5 children, and one class of 32 Years 4-6 children. To have this age range in any one class is educationally challenging and would be rejected by parents and governing bodies alike.
- 5.17 Intensive lobbying has so far not resulted in any remediation of this inequitable treatment of Lewisham, and the LA must assume in its planning that it will not receive "Safety Valve" grant.
- 5.18 Officers will continue to plan, as now, on a locality basis, to deliver the required number of places for 2010-11 and succeeding years, cutting our cloth according to available resources. The immediate priorities are to:
- prioritise the delivery of temporary "bulge" accommodation for 2010-11 and 2011-12;
 - explore the potential for releasing some existing space in schools by increasing the number of mixed age classes;
 - if and when sufficient finance is available, deliver permanent increases in PAL on existing school sites for delivery from 2011-12, and, in order to do so, consider incremental approaches to building projects;

- investigate possible new school sites for delivery from 2011-12 onwards
 - negotiate other sites including co-locations for delivery from 2011-12 onwards as opportunity and finance permit, working with Council and non-Council partners.
- 5.19 Despite the potential downsides, the LA will explore the feasibility of undertaking even a limited number of projects to release space in schools by increasing the number of mixed age classes containing children from no more than 2 year groups if this does not compromise educational standards and can demonstrate value for money.

6. Primary places demand and supply issues: 2007- 08 to 2011-12

Pre-2008-09

- 6.1 Historically Lewisham has had surplus places in many of its mainstream schools. Lewisham's PSfC reports that:

“Our early 2008 analysis of GLA projections for Lewisham had indicated that in 2016 there would be an overall shortage in the Borough of only 74 places or 2%. Previous experience has been that GLA figures significantly overestimate demand in Lewisham. This suggested that, at most, action might be required to increase or reduce the number of places in particular planning localities to address variation in demand across the Borough, and to improve the suitability and the condition of the primary schools estate.”

- 6.2 As reported to the Mayor on 28 May 2008 and in the June 2008 *Primary Strategy for Change*, significant investment had been completed or committed before early 2008 to improve Lewisham's primary estate. Because surplus places were at that time predicted to continue at least until 2016, (itself an increase on earlier predictions), this investment was intended to improve the conditions, suitability and standards of our existing schools, not to increase capacity.
- 6.3 In terms of mainstream investment, the new, all-age St. Matthew Academy, which opened in 2007, therefore retained the 2 forms of entry of its predecessor primary school. Childeric and Ashmead Primary Schools also retained their 2 and 1 forms of entry respectively when they opened in brand new accommodation in 2008. Planning for the incorporation of Monson Primary School into Haberdashers' Aske's Hatcham College began in 2006, and the proposal could not have been achieved in 2008 if it had been proposed to increase the 2 forms of entry. Investment in the refurbishment of the primary section, begun in 2009 and to be completed in 2010, was a result of DCSF investment in the extension of the Academy, and would not have been available for other LA schemes. In the case of Tidemill's rebuild, planning began in 2006 as an integral part of the Giffin Street redevelopment, with a planning application early 2008.
- 6.4 In addition, in the particular context of the need to deliver required secondary places on a constrained site, when it opens in 2011 our all-age mainstream school, Prendergast-Vale College was planned to reduce to 1fe the current 2fe entry of its predecessor primary school Lewisham Bridge.

2008-09

- 6.5 As reported in the Mayor and Cabinet report of 28th May 2008, the 2008 release of GLA data bucked the previous trend by predicting a significant rise in primary places demand for the 2008-09 school year. The June 2008 PSfC stated:

“The latest GLA demographic projections, dated 11 March 2008, show a very different picture of significantly increasing places demand in Lewisham. They also indicate that these forecasts may be more accurate than previously, based on a comparison of the 2008 GLA prediction compared to the January 2008 PLASC figures, which shows the GLA prediction to be below the actual number on roll.”

- 6.6 Increases in birth and fertility rates were the biggest determinants of the change in forecasts. As expressed in the PSfC:

“This change in forecast is predicated on increase in the 2005/06 birth rate (now factored into the GLA forecasts) which has been rising since 2001/02, and an increase in natural fertility rates which ONS began to factor into projections during 2006/07 (the highest fertility rate since 1980). The new GLA forecasts assume that this increased birth rate will continue, and, as a result, the Lewisham projections for the age 4 cohort between 2010 and 2017 are approximately 300 places higher each year than the previous version. Depending upon pressure in surrounding boroughs and the private sector, it is possible that more than 80% of these extra learners would seek places in Lewisham schools. This would have a 240 place impact (8fe) greater than the previous GLA school roll projections. This suggests a very substantial increase in the requirement for pupil places in Lewisham which could only be met by permanent provision rather than, for example, demountable classrooms and temporary changes to school Pupil Admission Limits (PAL).”

- 6.7 The PSfC reported that pressure would be felt in each of our 6 Primary Places Planning Localities (PPPLs).

“There is an increase over time in the demand for places, but at different rates. If no action were taken on the supply side, this would result in a 13% overall surplus of places in 2007 moving to a 15% shortage by 2017. Whereas current surpluses across the 6 Lewisham places planning areas vary between 7% and 21%, by 2017 there are shortages predicted to vary between 9% and 23%.”

- 6.8 In the short-term reality, by December 2008 over 450 late applications had outstripped the GLA Borough forecasts of a surge, and almost filled all our surplus Reception places across the Borough.

- 6.9 To respond to the demands of two PPLs in particular, this required the emergency creation of 60 extra places for the January 2009 Reception intake at Brockley and Holbeach Primary Schools (30 each). This provision took up pressure on places particularly from PPPL 3 (Brockley/ Lewisham/Telegraph Hill, PPPL 2 (Lee Green) and, to some extent, PPPL1 (Sydenham/Forest Hill).

2009-10

- 6.10 Lewisham’s spring 2009 “weighted average” projection based on GLA data, forecast that 15 extra places would be needed above the Borough published admissions limit (PAL), with a “high” forecast of demand for 116 extra

Reception places. The Authority planned prudently for a safety margin of 49 places above the “high” projection, 165 additional places in total.

- 6.11 However, by the time that applications were closed at the end of January 2009, demand for Reception places in 5 of the 6 PPPLs already outstripped the high figure and, with late applications by October 2009 subsequently significantly overtook even the safety margin.
- 6.12 As a result, in order to take further late applications into account, a total additional 255 “bulge” places over the Borough’s 2009-10 PAL have been created for 2009-10. This equates to 8.5 forms of entry (fe), which has met the pressures of the January 2010 Reception intake with a margin for any further late admissions. In relation to actual numbers of places taken up for 2010 as of January 2010, the margin of 3.2% places currently available is well within the 5% recommended by the government to allow for mobility in schools and localities.
- 6.13 The 255 extra “bulge” places have been created at 10 schools:

PPPL		No. Places	FE	Schools
1	Sydenham/ Forest Hill	60	2	Dalmain (15), Kilmorie (15), Adamsrill* (30)
2	Lee Green	30	1	John Ball (30)
3	Lewisham/Brockley/ Telegraph Hill	90	3	Brockley (30), Holbeach (30), John Stainer (30)
4	Catford/Bellingham/ Grove Park	45	1.5	Sandhurst (15) Forster Park* (30)
5	Deptford/New Cross	30	1	Deptford Park* (30)
6	Downham	0	0	
TOTAL		255	8.5	* late supply

- 6.14 As of the end of January 2010, of the 90 (3fe) places supplied to meet late demand at Adamsrill, Forster Park and Deptford Pak, 52 (2fe) had been taken up, and 15 offers rejected (0.5fe).

2010-11

- 6.15 Using the same 2009-10 PAL baseline, Lewisham’s predicted 2010-11 “low” demand was for 116 places (4fe). Our “weighted average” projection was a demand for 361 extra places (12fe). Our “high” forecast demand was for 454 (15fe), almost double the number of extra places delivered in 2009-10.
- 6.16 As of the end of January 2010 cut-off date, 3699 First Preference applications had been received on time for the 3156 Reception places available. This compares with 3446 applications received by this date last year, a difference of 543. Late in-borough applications in 2009-10 numbered 420. If late applications are factored in for 2010-11 at the same level, and an expected applications to acceptances “conversion” rate of 88% applied, this should result in an additional Borough-wide demand of 15-16fe, which is in line with the “high” prediction. If the uneven demand across localities is taken into account this could rise to 17 fe, as illustrated in the table below.

6.17 The extra demand per locality is as follows:

PPPL		2010-11 fe demand above Locality PAL
1	Sydenham/ Forest Hill	6.5
2	Lee Green	5.5
3	Lewisham/Brockley/ Telegraph Hill	2
4	Catford/Bellingham/ Grove Park	3
5	Deptford/New Cross	1
6	Downham	-1
TOTAL		17*

* Taking into account aggregated demand per locality.

- 6.18 Negotiations are therefore underway with governing bodies for the required number of additional Reception classes in each PPPL and will be finalised by the end of February 2010.
- 6.19 Permanently increasing a school's capacity by one form of entry entails creating 7 additional classrooms and also enhancing and extending the school's infrastructure and general facilities. There is a minimum timescale of two years to deliver such refurbishment schemes. It was therefore never envisaged that, should the required capital be available, refurbishments or, indeed new builds could be delivered before 2011-12. As a consequence any increases for 2010-11 will continue, as per previous years, to be "bulge" classes, that is one-off increases in the Reception intakes.
- 6.20 Meeting demand through the provision of "bulge" classes becomes more difficult over time. In all but one of the ten schools which have contributed to meeting additional demand in 2008-09 and 2009-10 (two of them, Holbeach and Brockley, in each of these years) internal remodelling and reorganisation of the existing accommodation has enabled the increases in Reception places. This option becomes increasingly difficult as the majority of these schools are not amenable to further remodelling of this kind, and many of the remaining 55 mainstream Primaries do not offer the same option.
- 6.21 It is likely, therefore, that for 2010-11, in the context of severe constraints on available capital, additional demand will be met mainly through the release of classrooms through more mixed age teaching in Key Stage 2 where numbers allow, as well as the provision of demountable classrooms. Whilst these are of a high standard, and have a good lifespan, their siting will usually decrease the amount of playground space available to a school in the context of increased pupil numbers. Many Lewisham primary schools do not have outside space which meets minimum recommendations for inner-city schools. Further curtailment of play space is therefore less than ideal.

2011-12

- 6.22 Using the same 2009-10 PAL baseline, Lewisham’s predicted 2011-12 “weighted average” projection is a demand for 401 extra places (13.5fe). Our “high” forecast demand is for 494 places (16.5fe).
- 6.23 These projections are as follows per locality:

PPPL		Low		Weighted Average		High	
		No.	FE	No.	FE	No.	FE
1	Sydenham/ Forest Hill	67	2	105	3.5	125	4
2	Lee Green	27	1	66	2	76	2.5
3	Lewisham/Brockley/ Telegraph Hill	54	2	110	3.5	134	4.5
4	Catford/Bellingham/ Grove Park	41	1.5	87	3	100	3.5
5	Deptford/New Cross	10	0.5	52	1.5	67	2
6	Downham	-42	0	-19	0	-8	0
TOTAL		157	7*	401	13.5	494	16.5

* Taking into account aggregated demand per locality.

- 6.24 For September 2011 the PCP is scheduled to deliver an additional 45 permanent Reception places (1.5 fe) above 2009-10 PAL from the Brockley and Gordonbrock projects, both in PPPL3. The rise in Brockley School’s PAL from 1fe to 2fe, and Gordonbrock’s PAL from 2.5fe to 3fe means that the overall Borough-wide PAL will be 3199. This reduces the “weighted average” forecast to 12fe and the “high” forecast to 15fe.
- 6.25 Since the approval of the PCP and PSfC by the Mayor on 28 May 2008, officers have undertaken feasibility work for permanent increases in their PAL in 13 primary schools (including Dalmain and Kilmorie, the two reserves on the PCP) to determine whether their permanent expansion for 2011-12 and beyond can provide value for money. In addition, feasibility work at Our Lady & St.Philip Neri and at St Bartholomew’s was carried out as a condition of their approval as PCP funded schools.

6.26 Feasibility work undertaken for permanent increases in PAL.

PPPL		No. Places	FE Increase	Schools
1	Sydenham/ Forest Hill	180 - 210	5 – 7	Dalmain (15-45), Kelvin Grove (30), Kilmorie (15-45), Adamsrill (30), Christchurch (30), <i>OL&SPN (15)*</i> , <i>St Bartholomews (15)*</i>
2	Lee Green	30	1	Lee Manor (30)
3	Lewisham/Brockley/ Telegraph Hill	60	2	Edmund Waller (30), Holbeach (30)
4	Catford/Bellingham/ Grove Park	75	2.5	Coopers Lane (30), Forster Park* (30), Sandhurst I & J (15)
5	Deptford/New Cross	60	2	Deptford Park (30), Kender (30)
TOTAL	Downham	375-435	12.5 -14.5	* Proposed refurbishments through the PCP

6.27 The feasibility studies on the 15 schools were analysed and ranked. All were assessed to have solutions, some more complex and difficult than others, but all, at high cost. At the present time none of these schemes is affordable, and officers will look to other solutions to meet demand over the next three years as outlined in Paragraph 5.18 above.

7. SEN Primary places in Lewisham: demand and supply

SEN demand

- 7.1 The Mayor and Cabinet report of 3rd October 2007, *Strengthening Specialist Provision for Children with Special Educational Needs*, which pre-dated the forecasts of significant pressures on overall demand for primary places, identified that the number of primary children with high level needs in the Borough would increase by 37 children from 316 in 2006/7 to 353 by 2015. This was a projection which took into account that, in accordance with Lewisham local authority policy, all new statements issued would be for children with higher level needs. This policy has been in place for approximately five years.
- 7.2 The Mayor and Cabinet report of 28 May 2008 *Primary Strategy for Change and Primary Capital Programme* focussed on overall demand for primary places, and the supply of places in mainstream primary schools. However, a proportion of increased demand is necessarily for places for children with SEN. The SEN figures are further increased as a result of a rise in prevalence of ASD diagnosis within the population, as outlined in Paragraph 7.7 below.
- 7.3 DCSF data from 2008 identified that 3% of all Lewisham students had statements of Special Educational Needs, down from 3.2% in 2006. By the end of the academic year 2008/09 the actual number of children between the ages of 4 and 10 with a statement of SEN totalled 536, some 85 children

more than had been estimated for that academic year¹ by the 2007 report *Strengthening Specialist Provision for Children with Special Educational Needs*.

7.4 More recent reviews of demand incorporate information from Health colleagues. This data is in the process of further updating. The latest available information indicates that by 2010-11 there could be 614 children with statements of SEN rather than the 387 estimated in 2007. As indicated in the table below, by 2015/16 this is predicted to increase to 826 4–10 year olds, compared with the previous estimate of 353 3–11 year olds.

7.5 Primary aged children with statements of SEN 2008-09 to 2019-20 (2008/9 are actual figures as at 29 May 2009).

	2008/9	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20
ASD	237	268	297	324	355	386	418	448	458	461	463	463
BESD	45	40	42	43	45	47	48	50	51	51	51	51
HI	15	20	21	22	22	23	24	25	25	26	26	26
MLD	38	40	42	43	45	47	48	50	51	51	51	51
MSI	7	2	2	2	2	2	2	2	3	3	3	3
PD	22	20	21	22	22	23	24	25	25	26	26	26
PMLD	13	20	21	22	22	23	24	25	25	26	26	26
SLCN	100	101	104	108	112	116	121	124	127	128	129	129
SLD	29	40	42	43	45	47	48	50	51	51	51	51
SPLD	23	20	21	22	22	23	24	25	25	26	26	26
VI	7	2	2	2	2	2	2	2	3	3	3	3
TOTALS	536	574	614	651	695	740	785	826	844	851	855	855

ASD demand

7.6 A growing proportion of the demand for SEN primary places is due to the higher rate of Autism Spectrum Disorders (ASD) diagnosis. Current information from Public Health in Lewisham indicates that the rate of ASD diagnosis in under 5s is 1.8% of that population compared with the 2007 SEN review estimates of 1.2%.

7.7 This increased Under 5s ASD pressure is having a subsequent impact on Reception demand. The total number of primary age children with ASD rose from an estimated 149 in the 2007 report to an actual figure of 237 by June 2009. This represents a rise from 33% of the total number of 3–11 year olds with statements to 44% of 4–10 year olds with statements.

SEN supply

7.8 The 2007 SEN report aimed to deliver 114 specialist places for this primary age group via Resource Bases in mainstream primary schools. This would have therefore catered for 32% of the report's projected higher level needs SEN population with a statement. 181 pupils or 51% were to be educated in special schools. A total of 83% of pupils with statements would therefore be educated within specialist provision, with the remaining 17% of this group educated in a mainstream setting.

¹ Page 33, *Strengthening Specialist Provision for Children with Special Educational Needs*, 3rd October 2007

7.9 Three resource bases in mainstream primary schools, at Coopers Lane, Kilmorie and Rushey Green, had already opened by 2007. Based on the figures in the 2007 report it was planned to open resource bases at:

- Perrymount – 16 places for Complex Physical and Medical Needs
- Tidemill – 16 places for SLCN
- John Ball – 16 places for children with ASD
- Forster Park – 16 places for children with SLCN

7.10 Perrymount and Tidemill have subsequently opened resource bases as planned. However specialist facilities are no longer planned to be delivered at John Ball, Holbeach and Forster Park. Instead an ASD resource base currently in development at Athelney Primary School is scheduled to open in September 2010. An alternative SLCN resource base and a second alternative ASD resource base are currently in the process of being identified. These additions would bring the programme up to the supply level identified in 2007.

7.11 The configuration of resources bases currently available or under negotiation is set out below:

School	No. of Places	Specialism
Coopers Lane	12	Hearing Impairment
Rushey Green	12	Hearing impairment oral/aural
Perrymount	16	Complex Physical & Medical Needs
Tidemill	16	Speech, Language & Communication Needs
Kilmorie	10	Learning Difficulty & Disability
Athelney	16	Autism Spectrum Disorder
Another Primary	16	Autism Spectrum Disorder
Another Primary	16	Speech, Language & Communication Needs
TOTAL	114	

7.12 As shown in the table at Paragraph 7.6 above, the forecast of 826 primary age children with a statement by 2015-16 is swollen by a substantial rise in the rate of incidence of ASD to 1.8% of the primary age population. This is 473 children more than in the original 2007 report. Specialist provision delivered at the 2007 level will accommodate 35% of the projected number of primary aged children with a statement of SEN. To deliver to the 83% level of specialist places, the programme would need to develop 685 specialist places. This is 390 more places than indicated in the 2007 report.

7.13 If this additional need were to be provided through Resource Bases, that would equate to up to 24 more primary SEN resource bases if each base were to support 16 children. In total 32 SEN resource bases would be

required at the primary level, 29 of which would be developed via the Strengthening SEN programme.

- 7.14 If this strategy were taken forward in full, the capital costs of these resource bases would be significant if pursued as independent projects. Revenue resourcing would need to be met from the Schools Dedicated Support Grant.
- 7.15 Officers will review the feasibility work already undertaken on the possible siting of additional Resource Bases, and will evaluate how best to support the increased demand for SEN primary places.

Special Schools

- 7.16 In 2007 it was proposed that once sufficient resource bases had been developed to address demand, the primary provision at Brent Knoll would be phased out and the school would be redeveloped as a secondary and 16+ provision. However short term responses to demand have meant that primary provision at the school has expanded from necessity. There are currently 55 primary children within Brent Knoll. This includes 8 children who were accommodated through an increase in capacity created in September 2009. It is planned that capacity for a further 10 places will be developed by Easter 2010.
- 7.17 Special schools with primary age pupils have been in receipt of considerable, recent capital investment, or have planned development proposed as part of the 2007 Lewisham Special Schools review. This comprises state-of-the art SLD provision at Watergate School, completed in 2004, a brand new SLD school at Greenvale completed in 2009 using Grouped Schools PFI funding, and the refurbishment of New Woodlands EBD School in 2009 through Lewisham and BSF funding. A new all-age ASD school is currently being planned and delivered through BSF due for completion in 2012-13. The new ASD school will provide for 120 pupils with a statement identifying ASD as their most significant need. The intention is to provide 54 primary places, 56 secondary places and 10 post-16 places.
- 7.18 No further capital investment in increasing provision is planned. In 2007 it was recognized that there was no provision in the capital programme for the £1.9m which had been identified as required. However since that date £1.9m has been secured from the Lewisham Modernisation allocation for this programme of work. The capital costs for the development of the primary phase of the new ASD school are funded through the BSF programme as part of the whole school's development.

8. Financial Implications

- 8.1 The total funding envelope for the Primary capital Programme was agreed by the Mayor on 28 May 2009. The funding assumed that the programme for the period 2008 – 11 would provide for the rebuilding of two schools and the refurbishment of two others which were both voluntary aided. The total funding envelope agreed was £23.6m.

- 8.2 This report recommends that the refurbishment of the two voluntary aided schools should not progress on value for money grounds. As a consequence the Primary Capital Programme can make claim neither to the funds of the Locally Coordinated Voluntary Aided Programme (LCVAP) nor the expected contributions from the dioceses and the two governing bodies. The consequence is that the funding envelope available is reduced. The impact on the funding envelope is set out below.

	Original £m	Revised £m
PCP Grant	11.1	11.10
Extended Services Grant	0.7	0.70
Schools DFC	0.5	0.20
Diocesan contribution 10%	0.5	0.00
LCVAP	1.2	0.00
Basic Need Supported Capital	9.6	9.60
Total	23.6	21.60

- 8.3 The Mayor has agreed commitments against the available funding in respect of Gordonbrock and Brockley primary schools these total £20.1m. This leaves an uncommitted sum within the PCP funding envelope of £1.5m.
- 8.4 During the period 2008–11 the Government has made available a sum of £6.5m capital allocation for modernisation purposes. This has been allocated to delivery of primary resource bases and planned renewals within the primary school estate to avoid schools closures.
- 8.5 The balance of the modernisation resources are committed to planned maintenance and plant renewal of the schools' estate to avoid school closures. The type of works being undertaken are boiler replacements, window replacement projects, electrical rewiring projects, roof replacements and school perimeter renewals (walls and fences). The delivery of the planned programme of works will be challenging to complete within the resources available.
- 8.6 In 2009/10 financial year the capital costs of the bulge reception classes has been met from resources within the Dedicated Schools Grant (DSG). The DSG maintains a budget provision for unplanned minor works in schools and it has proved possible to meet the costs from this budget provision for the current financial year. If the PCP funding envelope proved insufficient for 2010/11 bulge reception class needs then it would be possible to review the availability of funds allocated for school maintenance purposes within the DSG.
- 8.7 The provision of the additional classes will require project management support. The resources available within the Estates management Unit and the PCP programme management team have been reviewed and the work can be accommodated with some adjustment within the estates team to deal with this.
- 8.8 The PCP funding envelope was dependant upon the use of supported capital. The original decision by the Mayor indicated that the revenue cost falling upon the Council to undertake this borrowing was £630k. The

adjustments to the funding envelope in paragraph 8.2 above do not impact on the amount of supported borrowing required. The change in interest rates will however decrease the impact on the revenue budget of the Council.

- 8.9 The establishment of bulge reception classes has revenue consequences for the DSG. When each class is established the pupils taking the places are not in the census used by the Government to fund the Lewisham DSG until the following year. For each additional and temporary class there is a provision within the DSG to make an additional payment to the school in addition to its annual delegated budget allocation. The amounts allocated in 2009/10 total £456k and have been met from provisions made within the DSG.
- 8.10 In 2010/11 the equivalent cost of the additional 361 places is estimated at £654k. In setting the budget for the DSG in 2010/11 this estimated requirement will be taken into account. No costs will fall upon the General Fund in this respect.
- 8.11 In terms of the demands for 2011/12 and beyond there are no clear indications from central government as to the level of capital resources that will be made available to support this pressure. The current economic climate would suggest that the capital allocations provided in 2008–11 are unlikely to be matched in the next three year funding period. Once government intentions are more clear, most likely in the latter part of 2010 the funding of further temporary and, if possible, permanent classes will need to be considered.

9 Legal Implications

- 9.1 The Human Rights Act 1998 safeguards the rights of children in the Borough to educational provision, which the Council is empowered to provide in accordance with its duties under domestic legislation.
- 9.2 Section 14 of the Education Act 1996 obliges each local authority to ensure that there are sufficient primary and secondary schools available for its area i.e. the London Borough of Lewisham, although there is no requirement that those places should be exclusively in the area. The Authority is not itself obliged to provide all the schools required, but to secure that they are available.
- 9.3 In exercising its responsibilities under section 14 of the Education Act 1996 a local authority must do so with a view to securing diversity in the provision of schools and increasing opportunities for parental choice.

The Education and Inspections Act 2006 places requirements on Authorities to make their significant strategic decisions concerning the number and variety of school places in their localities against two overriding criteria:

- to secure schools likely to maximise student potential and achievement;
- to secure diversity and choice in the range of school places on offer.

Section 19 of the Education and Inspections Act 2006 provides that where a local authority or the governing body of a maintained school proposes to make a prescribed alteration to a maintained school and it is permitted to make that alteration, it must publish proposals.

- 9.4 The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007 provides that proposed enlargements of school premises which would increase the capacity of the school by more than 30 pupils and by 25% or 200 pupils (whichever is the lesser), or where there is a proposed increase in the number of pupils in any relevant age group by 27 or more, are prescribed alterations which means that statutory proposals have to be published, and there must be a period of four weeks for representations before a decision is made. This does not apply to temporary enlargements where it is anticipated that the enlargement will be in place for less than 3 years, or a rise in the number anticipated to last only one year.
- 9.5 The Council, before making any decision regarding the expansion of a school, must ensure that capital funding is in place, interested parties have been consulted, the statutory notice is published and there has been a four week period for representation.
- 9.6 Section 315 Education Act 2006 requires local authorities to keep their arrangements for special educational needs provision under review. In making decisions about SEN provision, the Council will need to comply with a number of statutory duties such as the need to have regard to the general principle set out in Section 9 Education and Inspections Act 2006 that children are educated in accordance with their parents' wishes so far as that is compatible with the provision of efficient education and the avoidance of unreasonable public expenditure. The Council will also have to have regard to its duties under the Disability Discrimination Act 1995.
- 9.7 However, this report requests officers to revert to the Mayor and Cabinet with a further report following feasibility work on proposals for capital expenditure on additional primary and/or SEN provision Full legal implications associated with those proposals will be set out in that further report.

10 Crime and Disorder Implications

- 10.1 There are no crime and disorder implications.

11 Equalities Implications

- 11.1 In addition to the implications for children without SEN, the report provides an update on the strategy to improve access to specialist provision for vulnerable groups, including primary age children with autism who currently have less access to appropriate local educational provision.

12 Environmental Implications

- 12.1 The impact on school environments of the solutions to providing additional primary places will be dictated by finance.

BACKGROUND PAPERS

Appendix 1	Lewisham's <i>Primary Strategy for Change 2008-17</i> June 2008
Appendix 2	Mayor and Cabinet report on the framework for Lewisham's <i>Primary Strategy for Change and Primary Capital Programme</i> 28 May 2008
Appendix 3	Mayor and Cabinet report <i>Strengthening Specialist Provision for Children with Special Educational Needs 3rd</i> Part 1 October 2007

If there are any queries on this report, please contact Chris Threlfall on extension 49971.

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MAYOR AND CABINET		
Report Title	Primary Strategy for Change and Primary Capital Programme	
Key Decision	Yes	Item No. 11
Ward	ALL	
Contributors	Executive Director CYP, Executive Director Regeneration, Executive Director Resources, Head of Law	
Class	Part 1	Date: 28 May 2008

1 Purpose of Report

- 1.1 This report provides for the Mayor's approval a framework of Lewisham's Primary Strategy for Change which will drive future capital investment in its primary estate and in so doing make a significant contribution to raising standards and improving the well being of children throughout the Authority. The Mayor's agreement is sought for proposals on the use of a first tranche of investment from 2009-11.

2 Recommendations

That the Mayor:

- a) notes the revision of the projections in the Mayor and Cabinet report of 16 January 2008 on the need for primary places in each of the 6 localities approved by the Mayor;
- b) agrees the framework for the Primary Strategy for Change and its contents at Paragraph 5 of the report;
- c) agrees, as part of the Primary Strategy for Change, and subject to feasibility work, the proposals for expenditure of a first tranche of capital funding over the period 2009-11 up to a limit of £23.6 million (including up to £9.6 million of Basic Need Supported Capital) on the following schools:
 - A new build (or refurbishment) of Gordonbrock Primary School to meet conditions and suitability requirements, to create full teaching groups and to meet increased locality need for places through expansion from 2.5 fe to 3fe;
 - A new build of Brockley Primary School to meet conditions and suitability requirements and to meet increased locality need for places through expansion from 1fe to 2fe;
 - An expansion of Our Lady & St Philip RC Primary School from 1.5 fe to 2 fe to meet conditions and suitability requirements, to create full teaching groups and to meet increased locality need for places in a good school;

- An expansion of St Bartholomew's CE Primary School from 1.5 fe to 2 fe to meet conditions and suitability requirements, to create full teaching groups and to meet increased locality need for places;
- The following schools to be held in reserve (subject to feasibility) for capital expenditure in relation to feasibility studies on Our Lady & St Philip RC Primary School and St Bartholomew's CE Primary School:
 - An expansion of Dalmain Primary School from 1.5 fe to 2 fe to meet suitability requirements, to create full teaching groups and to meet increased need for places in the same locality in a good school;
 - An expansion of Kilmorrie Primary School from 1.5 fe to 2 fe to create full teaching groups and to meet increased need for places in the same locality in a good school;
- d) To instruct officers to investigate the potential to realise further capital resource through disposal of elements of primary school sites, subject to this not jeopardising the potential for further expansion of pupil numbers;
- e) To delegate to the Executive Director for Children and Young People and to the Executive Director for Resources, in liaison with the Cabinet Member for Children and Young People, the responsibility for finalising and submitting the Primary Strategy for Change to the DCSF by 16 June;
- f) To note the results of ongoing consultation with stakeholders.

3 Policy Context

- 3.1 The LA has a duty to ensure the provision of sufficient places for pupils of statutory age and, within financial constraints, accommodation that is both suitable and in good condition.
- 3.2 In providing 21st century facilities for primary education, the Primary Capital Programme will contribute to the delivery of the corporate priority "Young people's achievement and involvement: raising educational attainment and improving facilities for young people through partnership working".
- 3.3 The Primary Capital Programme aims to renew up to 50% of the primary estate nationally, of which it is a requirement of Lewisham that at least 15% replaces existing estate most in need of renewal. It is intended to develop facilities that are more economic to run, and from which a range of extended services can be provided. In so doing this will contribute to the corporate priority of ensuring efficiency, effectiveness and equity in the delivery of excellent services to meet the needs of the community.

4 Background

- 4.1 At the Mayor and Cabinet meeting of 16 January 2008, the Mayor considered a report on the future demand for primary school places in Lewisham. The report was set within the context of the Government's requirement that all Local Authorities produce a Primary Strategy for Change (PSfC) in order to access the first tranche of funding (2009-11) of its 14 year Primary Capital Programme.
- 4.2 At the meeting of 16 January 2008 the Mayor agreed:
- a) To approve the 6 localities described in the report as the basis for analysing the demand for places and for future consultation on reorganisation proposals;
 - b) To note the projection of need for primary places in each locality up to 2012 and on to 2017;
 - c) To note that proposals for promoting the matching of provision and need in each of the localities and also addressing condition issues will be the subject of a further report to Mayor and Cabinet
 - d) To approve the process for consultation on the analysis of need for primary places;
 - e) To note the summary of our objectives for primary education as the basis for consultation and expansion with stakeholders for inclusion in the PSfC.
- 4.3 This report provides for approval by the Mayor the framework for the Lewisham Primary Strategy for Change to be submitted to the DCSF by June 16 2008. In so doing, it updates projections in the Mayor and Cabinet report of 16 January 2008 on the need for primary places in each of the 6 localities. As requested by the Mayor, planned housing developments which are not yet approved have now been included in this report to give a more accurate prediction of the need for places in specific localities proposed accommodation.
- 4.4. The report also uses the latest (March 11 2008) GLA school roll projections for 2004-2017 which were not available at the time of the previous report, and which indicate a significantly higher level of future need for places across Lewisham.
- 4.5 The report sets out the criteria for matching need to provision and applies those criteria to describe how capital provision might best be matched to need in each of the 6 Lewisham planning localities over the period 2009-17.
- 4.6 As indicated in the previous report, the following headings as agreed by the Secretary of State will be used for the format of the Lewisham Primary Strategy for Change:
- The Local Lewisham Perspective - our vision for primary education in the 21st century
 - Our Long Term Aims – our investment priorities for the next 14 years and contribution to national policy objectives;
 - A baseline analysis – number, condition and suitability of places, performance of schools

- Our initial investment priorities, - in particular the school projects to be delivered in 2009-10 and 2010-11.
 - Our approach to change – management of the processes with stakeholders
- 4.7 Section 5 of this report uses these headings to provide the framework for Lewisham’s Primary Strategy for Change.
- 4.8 The report of 16 January 2008 set out the governmental policy context for its Primary Capital Programme (PCP). A review of primary places within a comprehensive Primary Strategy for Change (PSfC) is a condition of PCP grant.
- 4.9 The criteria for completion of the PSfC require the Authority to describe its baseline position on educational performance, deprivation, pupil places, and building conditions and suitability, and how it will demonstrate links with other provision to meet the needs of the children and young people’s economy. The PSfC will also set out the Authority’s approach to change within the context of a 14 year programme, its long term plans and its decisions on the expenditure of a first tranche of capital grant for 2009-11.
- 4.10 Local Authorities are required under Primary Strategy for Change guidance to work over the life of the programme towards reducing overall surplus to under 10% ,with no school having more than 25%, and to prioritise taking action as early as possible to tackle surpluses in unpopular schools.
- 4.11 Lewisham has already made significant investment in its primary estate. Childeric Primary School recently opened in brand new accommodation; Rushey Green and Ashmead are currently being rebuilt, and Tidemill’s rebuild is planned as part of the Giffin Street redevelopment. All of these schools are or will be ICT rich with an infrastructure which will enable their joining an Authority-wide network as it is rolled out from the secondary BSF programme into our primary schools. This is also our intention for our new investment under the PCP.
- 4.12 Special schools with primary age pupils are already in receipt of recent capital investment, or have planned provision proposed as part of the Lewisham Special Schools review. This comprises very recent, state-of-the art PSLD provision at Watergate School, a brand new PSLD school, refurbishment of New Woodlands EBD School, and, through BSF funding, a proposed new all-age ASD school. In addition, 2 resource bases are already in operation in primary schools, and a further five are planned with identified funding.
- 4.13 Contingent upon approval by the DCSF of Lewisham’s Primary Strategy for Change, Lewisham will receive £11 million of Primary Capital Project (PCP) funding for the financial years 2009-10 and 2010-

11. The government has indicated that further three year tranches of funding will subsequently be made available over the 14 years of the programme, but has as yet not indicated what the sums will be.

4.15 The planning that Lewisham has so far undertaken, and which is set out in this report, is over the period 2008-17, taking in:

Tranche 1: FY 2009-10, 2010-11

Tranche 2: FY 2011-12, 12-13, 13-14

Tranche 3: FY 2014-15, 15-16, 16-17

4.16 Place Planning Localities in this report remain the same as those described in the report of 16 January 2008.

5 Framework for the Primary Strategy for Change

5.1 Lewisham's vision for primary education in the 21st century

5.1.1 Our vision is that every Lewisham school is a good school, where all pupils exceed their predicted potential. Our vision for primary education over the next 5 years is derived from analysis of local needs. Its delivery across the five strands of Every Child Matters is encapsulated within our annually reviewed Children and Young People's Plan (CYP).

5.1.2 We aim to raise attainment to match and outstrip national attainment at Foundation Stage, Key Stage 1 and Key Stage 2, and to continue to make improvements year on year so that all children have a solid foundation for transfer to secondary schooling. Integral to this vision is the closing of achievement gaps between Borough averages and our underachieving groups defined by poverty, gender and ethnicity. More broadly within the context of Every Child Matters, our CYP plan articulates a universal offer which aims to reduce the numbers of vulnerable children requiring acute and targeted support through multi-agency early intervention.

5.1.3 Through a rigorous focus on learning, continuous support for curriculum review and development, and a focus on teaching quality we aim to deliver broad, balanced and creative curricula which are relevant to Lewisham's communities and which are accessible to all pupils through personalisation. Our SEN strategy aims to deliver inclusive schools and settings to ensure that all children achieve well, are safe, healthy and make a positive contribution.

5.1.4 As part of our long term vision of schools working together across many areas of school improvement, we will continue to strengthen our primary school collaboratives within four quadrants, building capacity to impact directly on raising standards of pupil attainment and improving other outcomes for children including in relation to their health and well being through joint commissioning and being the units of delivery for central agencies, including extended provision. We will look to develop hard federations of schools to raise standards and provide economies

of scale, with their focus on meeting the needs of their local communities and ensuring vulnerable children and families access services.

- 5.1.5 Lewisham children and young people require a talented, diverse workforce to ensure high quality teaching and learning in all our schools, with strong visionary school leaders to provide strategic direction. We will continue to improve our high quality professional development programme at all levels to support succession planning for sustainability. Our workforce strategy also seeks to embed multi agency working and opportunities for those in all sectors to broaden their skills base.
- 5.1.6 Parents play the key role in their children's success and are key to the achievement of the vision for Primary Education in Lewisham. A priority is to maximise the contribution of parents to their children's learning and to ECM outcomes, promoting aspirational expectations within parents' communities and engaging them in their children's education from a very early stage.
- 5.1.7 We will continue to support and develop a diversity of primary provision to enable parental choice, including Faith schools and including all-age schools which can provide examples of progression with pace and challenge across the usual phase boundaries, and, through their family ethos, models of responsibility taken by older children for the young.
- 5.18 Further improving our primary estate, including ICT rich facilities networked across the Authority, will make a significant contribution to improving outcomes for our children, many of whom have a difficult start in life. Lewisham has an excellent track record in its capacity to be strategic about the development of its estate, for example through its BSF programme, and in levering in funding to maximise programme impact, for example through its Giffin Street regeneration programme, which incorporates the building of a new primary school.
- 5.1.9 To realise our ambitions we will continue to compare ourselves to the highest achieving Local Authorities in the belief that only the best is good enough for our children.

5.2 Our Long Term Aims

- 5.2.1 Priorities for change and related investment will be underpinned by Lewisham's determination to continue to improve outcomes for children in the Borough, and to close achievement gaps between groups of children.

Criteria to arrive at priorities for change

- 5.2.2 Priorities will be arrived at by the application of the following criteria:

- 1 Provide sufficient places at the right time to meet future needs within and between planning localities in the Borough;
- 2 Improve conditions and suitability of schools in order to raise standards;
- 3 Increase the influence of successful and popular schools;
- 4 Maximise the efficient delivery of education in relation to size of school, removing half-form entries, and promoting continuities of education;
- 5 Enable school extended services for pupils, parents and communities;
- 6 Optimise the use of the Council's capital resources available for investment.

5.2.2 Investment priorities will be considered on a Borough-wide basis in relation to the needs of localities as indicated by an analysis of the relevant data.

5.3 Baseline analysis and options for change in localities

*Revised Projections on the balance of Primary Pupils' Places and Need:
Borough-wide data*

5.3.1 Based on the latest GLA information at that time, the report of 16 January 2008 described the trend in Lewisham's projected balance of primary pupils' places and needs up to 2017. The GLA projections indicated that in 2016 there would be an overall shortage in the Borough of 74 places or 2%. Previous experience in Lewisham had been that GLA figures overestimated demand, and this suggested that, at most, action might be required to increase or reduce the number of places in particular localities to address variation in demand across the Borough, and improve the suitability and the condition needs of the primary schools estate.

5.3.2 However, some of the data from the latest GLA demographic projections for Lewisham (dated 11 March 2008) can be compared to actual data. This shows the GLA admissions roll projection for 2007-08 school year to be 2900 pupils against an actual roll of 2934 (PLASC January 2008), indicating a greater degree of predictive accuracy.

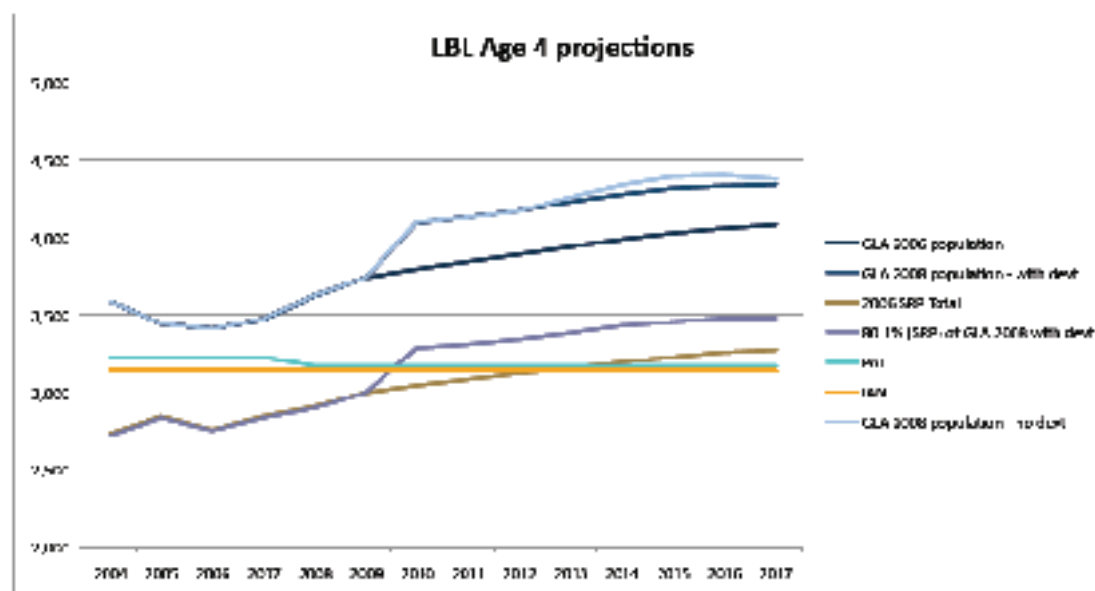
5.3.3 In addition, these latest GLA demographic projections for Lewisham show significant increases on the previous data. The reasons for the changes are:

- Increase in birth rate in 2005/06 (which is now factored into the GLA forecasts, but was not previously);
- The number of births has been rising since 2001/02
- The increase in natural fertility rates which ONS began to factor into projections during 2006/07 (highest fertility rate since 1980)

5.3.4 The latest information on applications for the new academic year 2008-09 shows that roll growth this year is in line with GLA projections for the Borough as a whole although it is too early to say whether this will continue in future years.

5.3.5 The impact is significant, as the Chart 1 shows:

Chart 1



5.3.5 Chart 1 shows a number of school roll projections (SRP) produced by the GLA in 2006 and most recently in March 2008. The 2008 projections have been adjusted locally to produce projections influenced by more specific knowledge about the planning localities. The trend lines therefore show 2008 projections with and without development. The projection used in the report for Year Reception data is the “80.1% (SRP) of GLA 2008 with development”. This reflects the proportion of Lewisham resident Year Reception children that go to schools out of the Borough. The Planned Admission Limit (PAL) shown is the total planned admission capacity at Year Reception. The Indicated Admission Number (IAN) is the number of places available according to the standard or suitability of the accommodation available in the schools.

5.3.6 The age 4 (Reception) population in 2010 is projected to be approximately 300 more than the previous projections (births in 2005/06 academic year). Depending upon pressure in surrounding boroughs and the private sector, it is possible that more than 80% of these extra learners would seek places in Lewisham schools. This would have a 240 place impact (8FE) greater than the previous GLA school roll projections.

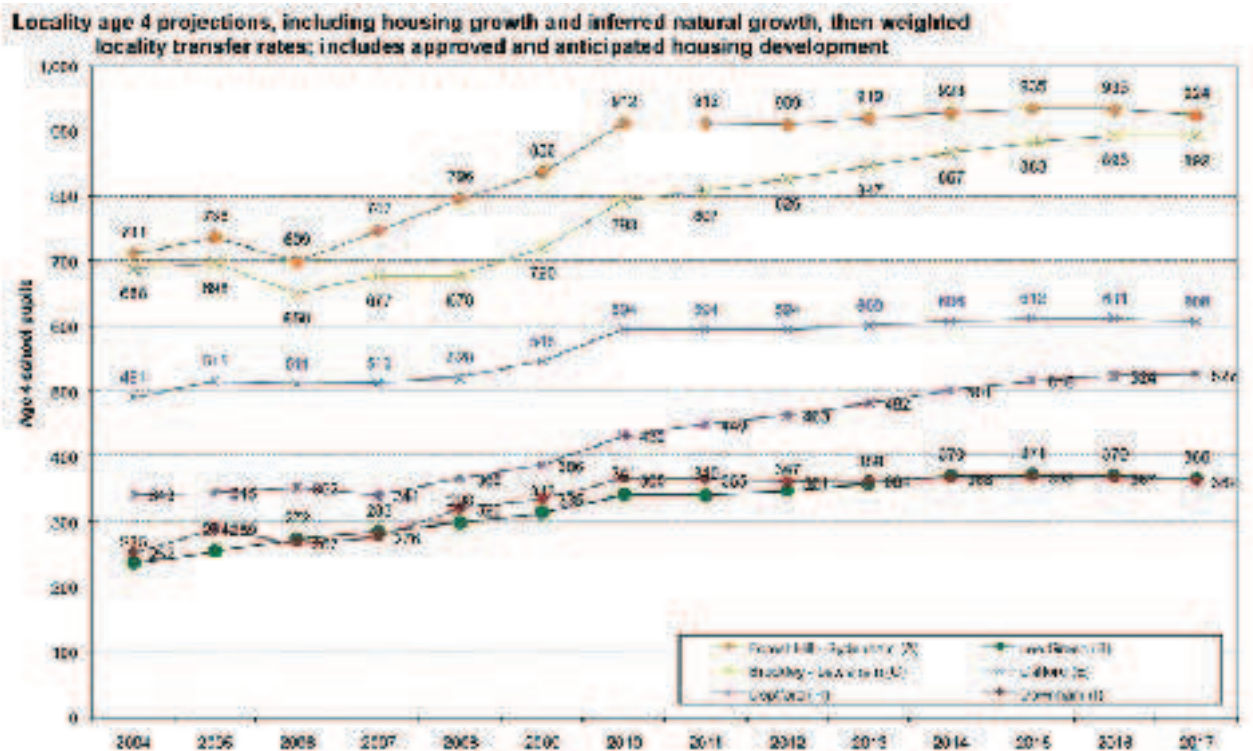
5.3.7 The new GLA forecasts assume that this increased birth rate will continue, and, as a result, the projections for the age 4 cohort between

2010 and 2017 are approximately 300 higher each year than the previous version. This suggests a very substantial increase in the requirement for pupil places which would need to be met by permanent provision rather than demountable classrooms and temporary changes to school Pupil Admission Limits.

5.3.8 In addition to the new GLA projections, Chart 2 below includes the estimated impact of new residential developments which have not as yet received planning permission as well as those that have. The chart shows the projected growth in numbers of Reception age places needed from 2004-2017 in each of the 6 planning localities. The model to determine child yield for all housing developments has used the Wandsworth ratio for primary age pupils, which is lower than that used by the Authority's planners.

5.3.9 The report of January 16th 2008 referred to the Oxfordshire Model in order to project the pupil yield from housing developments. In calculating the current projections, the Wandsworth model has been used in this report as the mix of housing development and the experienced pupil yield in that model is more similar to the context in Lewisham. The impact has been to moderate some of the projections made.

Chart 2



5.3.9 Chart 3 below shows the result of these trends on total primary places projected to be needed in each locality.

Chart 3

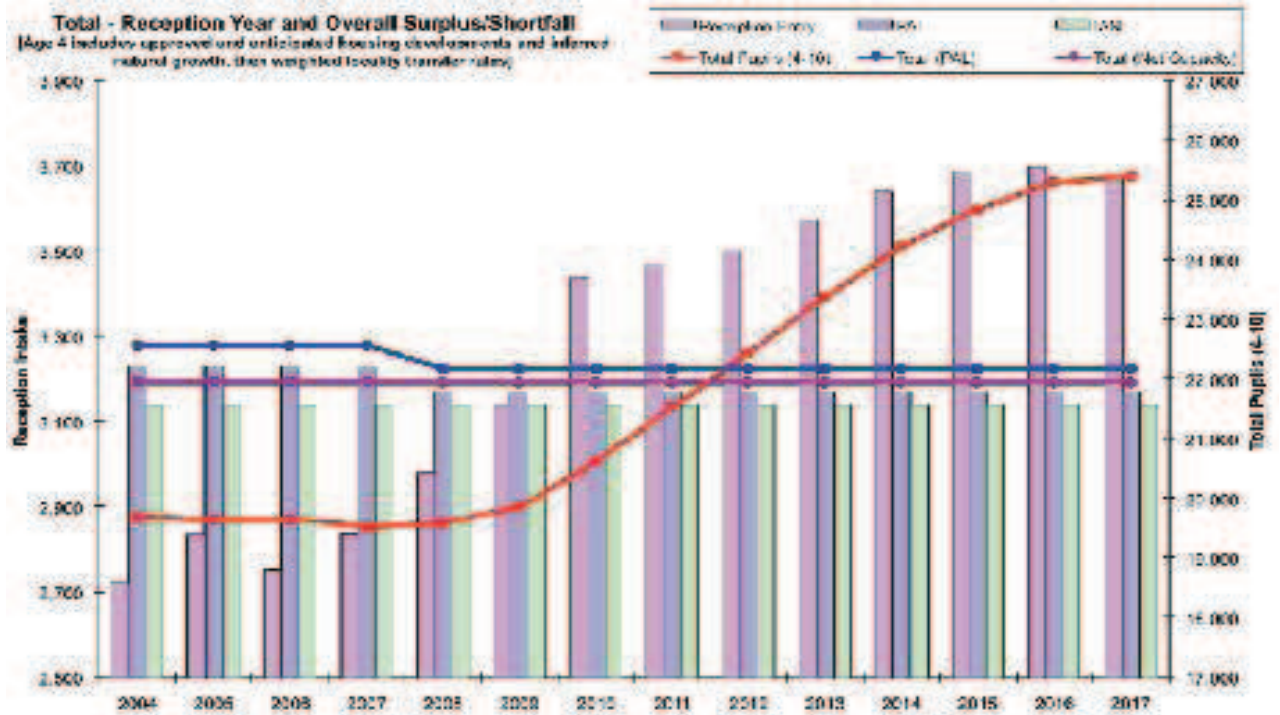


5.3.10 Chart 4 below shows the Reception Year and also the total Borough level shortfalls or surpluses from 2004-17. In this and subsequent charts, the bars show the position for the reception Year Planned Admissions Limit (PAL) and the horizontal lines show the equivalent data for the total PAL. The net capacity is a calculation of the total pupils that could be accommodated in the school determined from the physical attributes of the building. The indicative admission number (IAN) is the net capacity of the whole school divided by the number of year groups. Where the IAN is less than the PAL there are issues about the suitability of the accommodation to provide for the education of the pupils e.g. small classrooms.

5.3.11 Chart 4 shows that the entry to reception is just below PAL in 2009 (3,136 compared to 3,169), then rises sharply in 2010 to exceed the overall PAL by nearly 300 pupils. Thereafter Reception entry continues to rise to reach 3677 in 2017.

5.3.12 The overall pupil numbers rise every year from 2009 to exceed the current PAL in 2012.

Chart 4



Position against Total Places

5.3.13 The data on total places demand (ages 4 – 10) and capacity is shown for each area in Table 1 below. The Table below shows the total numbers on roll against the total of planned admissions across all year groups for 2006, 2007 and the GLA projection for 2017. Some of this data can be seen diagrammatically in Chart 2 above. (Para 3.8)

Table 1

Locality	PAL 2006	NO R 2006	2006		PAL 2007	NO R 2007	2007		PAL 2017	Pred - icted NOR 2017	2017	
			Sur - plu s	% Sur - plus on PAL			Sur - plu s	% Sur - plus on PAL			Pred - icted Short - age	% Short - age on PAL
A. Forest Hill, Sydenham	5775	5171	604	10	5775	5158	617	11	5670	6379	709	12.5
B. Lee Green	2170	1908	262	12	2170	1904	266	12	2205	2705	500	22.7
C. Brockley, Lewisham	5292	4634	658	12	5292	4588	704	13	4977	5938	961	19.3

Telegraph Hill												
E. Catford Bellingham Grove Park	388 5	359 9	286	7	388 5	358 2	303	8	388 5	4258	373	9.6
H. Deptford/ New Cross	304 5	245 1	594	20	304 5	240 7	638	21	294 0	3499	559	19.0
I. Downham	241 5	190 2	513	21	241 5	190 4	511	21	241 5	2638	223	9.2
TOTAL	225 82	196 65	291 7	13.0	225 82	195 43	303 9	13.0	220 92	2541 7	3325	15.0

5.3.14 Table 1 above shows that against the Total Planned Admissions the surplus has grown between 2006 and 2007, but that by 2017 the GLA projections indicate that there could be an overall shortage of around 3300 places in total. Further it shows that in the Deptford and Downham localities there is currently a significant surplus capacity of just over 20% but that there is likely to be a shortage of places in these two localities in 2017

5.3.15 On the basis of the above projections there would be a continuing surplus of places until 2012 when there is a shortage of 332 places across the Borough, but that the indicated suitable accommodation (IAN) will have been exceeded. In order to improve the position in the short term it would be possible to adjust the PAL where there are part classes to reduce the surplus and achieve some educational benefits in terms of reduced mobility and casual admissions. If actions were agreed in 2008 they would not take effect until 2009.

5.3.16 The detailed implications of these Borough-level projections for each of the 6 localities are set out below, together with other relevant data and options for change between 2009-17. However, despite some indications of increased accuracy of GLA projections this year, the Authority will need to take a cautious approach to these projections in view of current locality surpluses and the lack of convincing evidence that predicted trends will be realised in future years.

5.3.17 Therefore it is important to note that the options per locality described in this section for Tranches 2 and 3 are possibilities for further consultation with stakeholders as trends emerge over time, and are only indicative at this point of how future need for places might be met. Decisions on investment after 2011 will depend on whether the projections of pupil place need forecast by the GLA, together with the impact of new housing, are realised in actual numbers, and on detailed discussion with stakeholders.

5.3.18 Proposal for Tranche 1 funding (2009-11) are the subject of a recommendation to the Mayor as part of this report. All Tranche 1 proposals, and the options for Tranches 2 and 3, are set out together at 5.10 (Initial Investment Priorities) below.

Locality Places data

5.3.19 The 6 localities are based on evidence of the limits of where parents send their children to primary school in Lewisham, taking into account natural boundaries such as main roads and railway lines. As a result they are of different sizes.

Rationale for Locality Choice for Tranche 1 investment

5.3.20 In determining which area to choose first for investment, the need to address pupil numbers in the Reception year for 2010 was identified as a critical factor in meeting the overall demand for places. On this basis, as can be seen in the section on localities below, Sydenham / Forest Hill (A) potentially has a shortfall equivalent to three forms of entry, and Brockley / Lewisham (C) a projected shortfall equivalent to two forms of entry. All the other areas have no more than one form of entry of potential demand to meet. Given the cautious approach being taken to the pupil projections it is clear that early action will have to be taken in these two localities. For this reason, the Tranche 1 proposals are focussed on these two areas.

5.4 Locality Group A: Forest Hill – Sydenham

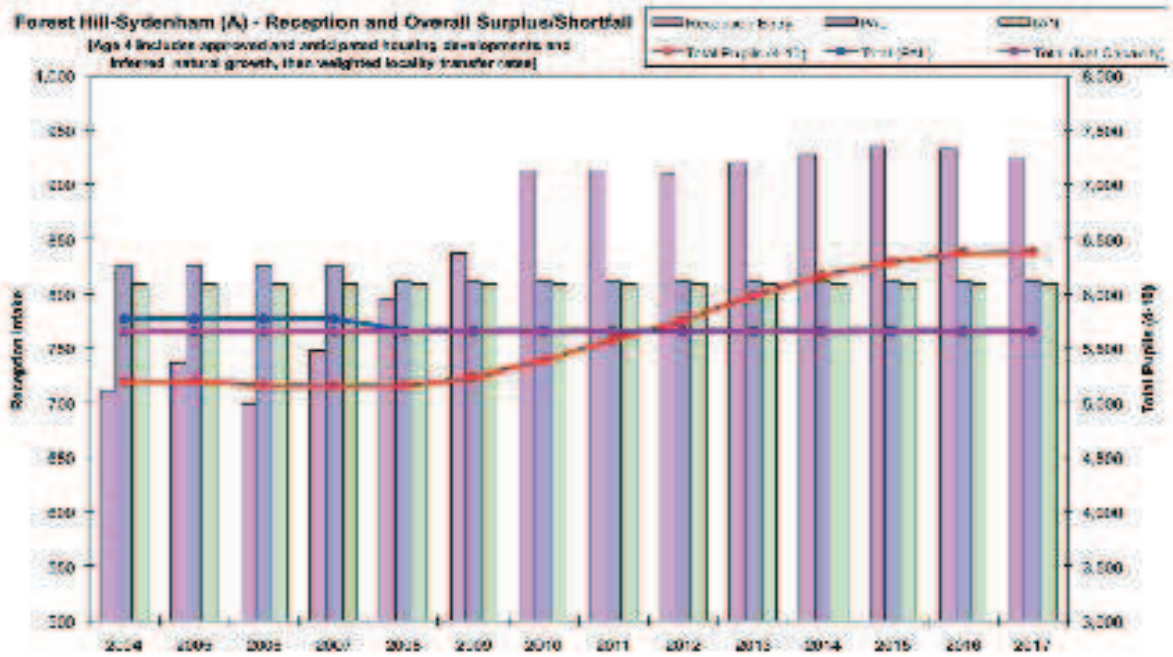
Locality Group A	
Adamsrill Primary School	Dalmain Primary School
Christ Church C E Primary School	Stillness Infants School
Kilmorie Primary School	Stillness Junior School
Our Lady & St Philip Neri RC Primary School	St William Of York R C School
Haseltine Primary School	Eliot Bank Primary School
Rathfern Primary School	Holy Trinity C E Primary School
Perrymount Primary School	St Bartholomew's C E Junior and Infant School
Fairlawn Primary School	St Michael's CE Junior and Infant School
Horniman Primary School	Kelvin Grove Primary School

5.4.1 Chart 5 below shows that:

- The Reception PAL (810) is predicted to be exceeded in 2009 by 25, and in 2010 there is a projected Reception shortfall of 102 (3fe+). Reception intake continues to rise to a high of 935 in 2015, a shortfall of 125 places (4fe+).

- The total roll is currently below the total PAL, but there is a gradual rising trend from 2009, so that the total net capacity and total PAL could fill by 2012.
- As a result, there is a predicted potential total shortfall of 305 places by 2013, of 620 places by 2015 and of 709 places by 2017, probably not growing thereafter.

Chart 5



Other relevant data

5.4.2 Of the 18 schools in this locality, 12 are judged by the Authority to be good or outstanding. Two are judged to be in need of additional support in order to raise standards.

5.4.3 There are 4 CE schools and 2 RC schools.

5.4.4 Four schools have 1.5 fe entry. There is an Infant school adjacent to its feeder Junior school.

5.4.5 Three schools are in the top 16 Lewisham schools requiring conditions works, and 3 schools have significant suitability issues.

5.4.6 Four high performing schools have sufficient site area to warrant further investigation of their capacity to move from current 2fe to 3fe if required.

Options for Change to provide future capacity

Initial Options	Total places Yield	Suggested programme priority based on need for places
Expand Our Lady & St Philip RC from 1.5 fe to 2 fe.	105	Tranche 1 (RC Diocese)
Expand St Barts from 1.5 fe to 2 fe.	105	Tranche 1 (CE Diocese)
Expand Dalmain from 1.5 fe to 2 fe.	105	Tranche 1 (Reserve)
Expand Kilmore from 1.5 fe to 2 fe.	105	Tranche 1 (Reserve)
Expand a high performing 2fe school to 3fe	210	Tranche 3
TOTAL PLACES NEED	709	
TOTAL PLACES YIELD	630	

Rationale for selection of Locality schools for Tranche 1 investment

5.4.7 As stated at 5.3.20 above, the Sydenham / Forest Hill locality has a potential Reception shortfall for 2010 equivalent to three forms of entry, and is therefore in need of early expansion of Year Reception places along with the Brockley/Lewisham locality.

5.4.8 The expansion of Our Lady & St Philip RC will fulfil the objective of investing in a high achieving and popular school to deliver increased locality need for places. Moving the school from 1.5 fe to 2 fe will fulfil an important criterion of creating full teaching groups. The investment will improve the condition of the school, which requires considerable upgrading, and also the suitability of its classrooms, a number of which are below recommended size. Agreement with the Southwark RC Diocese on funding, as well as general agreement on site feasibility in

relation to the efficient use of resources will be conditions of the investment.

5.4.9 The expansion of St Bartholomew’s CE will also deliver increased locality need for places whilst at the same time creating full teaching groups by moving the school from 1.5 fe to 2 fe. The condition of the school needs considerable investment. These improvements will support the school’s ambition to move to a category of good or outstanding. Agreement with the Southwark CE Diocese on funding, as well as general agreement on site feasibility in relation to the efficient use of resources will be conditions of the investment.

5.4.10 The inclusion of Dalmain as a reserve choice acknowledges that the conditions for investment in the two 1.5fe schools chosen might not be met. Dalmain as a 1.5 fe school would be a merited alternative to move to 2 fe, and in so doing meet increased locality need for places in a good school. In particular it would improve the suitability of the classrooms of the school many of which are below recommended size.

5.4.11 The inclusion of Kilmorrie as a reserve choice acknowledges that the conditions for investment in the two 1.5fe schools chosen might not be met. Kilmorrie as a 1.5 fe school would be a merited alternative to move to 2 fe, and in so doing meet increased locality need for places in a good school.

5.5 Locality Group B: Lee Green

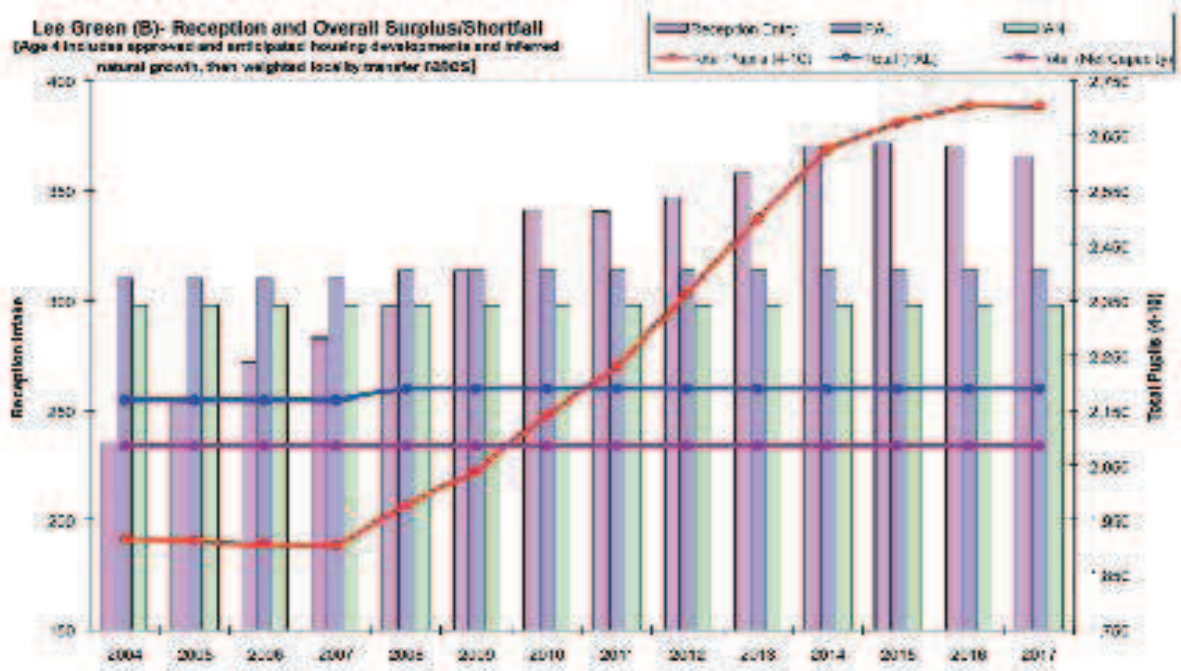
Locality Group B	
All Saints C E Primary School	Lee Manor
John Ball Primary School	St Winifred's Infant School
Our Lady Of Lourdes RC Primary School	St Winifred's Junior School
Brindishe Primary School	St Margaret's Lee C E Junior and Infants

5.5.1 Chart 6 below shows that:

- The Reception PAL (315) is predicted to be just overtaken in 2009, and in 2010 there is a projected Reception shortfall of 28 (1fe-). Reception intake continues to rise to a high of 371 in 2015, a shortfall of 58 places (2fe), and reduces very slightly through to 2017.
- The total roll is currently well below the total PAL, but there has been a gradual rising trend underway since 2004, so that the total net capacity (which is 85 below total PAL) could fill by 2010 and total PAL could fill by 2012.

- As a result, there is a predicted potential total shortfall of 328 places by 2013, and of 536 places by 2016.

Chart 6



Other relevant data

- 5.5.2 Of the 8 schools in this locality, 7 are judged by the Authority to be good or outstanding. The other school is an all-age Academy opened in new buildings in September 2008
- 5.5.3 There are 2 CE schools and 3 RC schools (including the Academy).
- 5.5.4 Two schools have 1.5 fe entry. There is an Infant school near but not adjacent to its feeder Junior school.
- 5.5.6 Two schools are in the top 16 Lewisham schools requiring conditions works, and 2 schools have significant suitability issues.
- 5.5.6 One school has sufficient site area to warrant further investigation of its capacity to move from current 2fe to 3fe if required. One school is borderline in its capacity to move from 1fe to 2fe, and another in its capacity to expand to 2fe.

5.5.7 Options for Change to provide future capacity

Initial Options	Total places Yield	Suggested programme priority
Expand a good school by 1fe.	210	Tranche 2
Expand an Infant and a Junior School from 1.5fe to 2 fe	105	Tranche 2 (RC Diocese)
Expand a good school by 1fe	210	Tranche 3
TOTAL PLACES NEED	535	

TOTAL PLACES YIELD	525	
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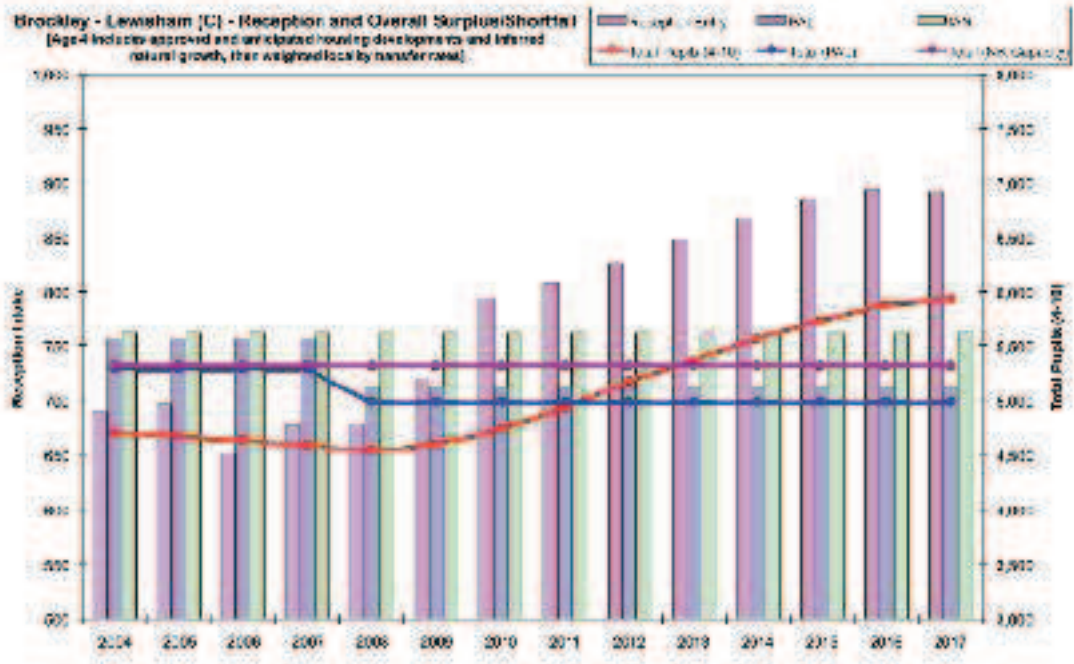
5.6 Locality C: Brockley, Lewisham, Telegraph Hill

Locality Group C	
Ashmead Primary School	John Stainer Primary School
Brockley Primary School	Myatt Garden School
Lucas Vale Primary School	Gordonbrock Primary School
Lewisham Bridge School	St Saviour's R C Primary School
St Mary Magdalen Catholic Primary School	Hither Green Primary School
St Stephen's C E Primary School	St Mary's Lewisham C E Primary School
Turnham Primary School	Holbeach Primary School
Edmund Waller Primary School	

5.6.1 Chart 7 below shows that:

- The Reception PAL (711) is predicted to be overtaken in 2009 by 9, rising in 2010 to a projected Reception shortfall of 82 (3fe-). Reception intake continues to rise to a high of 893 in 2016, a shortfall of 182 places (6fe), and reduces very slightly in 2017.
- The total roll is currently well below the total PAL, but a rising trend is predicted from 2008, so that the total PAL could fill by 2011 and total net capacity (which is around 220 above total PAL) could fill by 2013.
- As a result, there is a predicted potential total shortfall of 203 places by 2012, 590 places by 2014 and of 961 places by 2017.

Chart 7



Other relevant data

- 5.6.2 Of the 15 schools in this locality, 12 are judged by the Authority to be good or outstanding. Three schools are judged to be in need of additional support to raise standards.
- 5.6.3 There are 2 CE schools and 2 RC schools.
- 5.6.4 One school has 2.5 fe entry, another a 3fe.
- 5.6.5 One school will move into new buildings in this year. Another is planned to be incorporated into a new all-age school built under BSF to open in September 2010.
- 5.6.7 Four schools are in the top 16 Lewisham schools requiring conditions works, and 5 schools have significant suitability issues.
- 5.6.8 Gordonbrock has sufficient site area to warrant further investigation of its capacity to move from current 2.5fe to 3fe, and Brockley its capacity to expand from 1fe to 2fe. Another school has sufficient site area to warrant further investigation of its capacity to move from 2fe to 3fe if required.

Options for Change to provide future capacity

Initial Options	Total places Yield	Suggested programme priority
New build (or refurbishment) of Gordonbrock to expand from 2.5 fe to 3fe	105	Tranche 1
New build Brockley to expand from 1fe to 2fe.	210	Tranche 1
Consider other options for realising increased capacity as required	630 (up to)	Tranche 3
TOTAL PLACES NEED	961	
TOTAL PLACES YIELD	945	

Rationale for selection of Locality schools for Tranche 1 investment

- 5.6.9 As stated at 5.3.20 above, the Brockley/Lewisham/Telegraph Hill locality has a potential Reception shortfall for 2010 equivalent to two forms of entry, and is therefore in need of early expansion of Year Reception places along with the Sydenham / Forest Hill locality.
- 5.6.10 A new build (or refurbishment) of Gordonbrock to expand from 2.5 fe to 3fe will fulfil the objective of investing in a good and popular school to deliver increased locality need for places. Moving the school from 2.5 fe to 3 fe will fulfil an important criterion of creating full teaching groups. The investment will improve the condition of the school, which requires

very considerable upgrading, ranking as having the highest expenditure need on the Lewisham conditions list, and also the suitability of its classrooms, many of which are below recommended size. Agreement on site feasibility in relation to the efficient use of resources will be a condition of the investment.

5.6.11 A new build of Brockley also meets increased locality need for places through a proposed increase from 1fe to 2fe on a site which is large enough for expansion. The school needs considerable expenditure on conditions works, ranking eight on the Lewisham conditions list and occupying a very visible site in the borough. It also requires very considerable improvement to the suitability of some of its classrooms and to the overall environment of the school. A new build of the school at its existing 1fe would not be an efficient use of resources, and would not produce additional places. Standards at the school are low but the School Improvement Team judges the school to be improving as a result of support from the Authority and the leadership of the acting Head. While it would be preferable to invest in an already successful and popular school, given that we need the places at Brockley school, it becomes a priority to invest to help make the school more attractive to prospective parents as we have done with Childeric School in the north of the borough. With the appointment of substantive new leadership of the school, and the continuing support of the School Improvement Team the aim is for this investment to lead to significantly raised standards and outcomes for children as well as to increase its popularity. Officers will need to keep the school's improvement rate and popularity under review over the next two years and consider alternative school improvement strategies if required. Agreement on site feasibility in relation to the efficient use of resources will be a condition of the investment.

5.7 Locality E: Catford, Bellingham, Grove Park

Locality Group E	
Baring Primary School	Forster Park Primary School
Coopers Lane Primary School	Holy Cross R C Primary School
Sandhurst Infants And Nursery School	Rushey Green Primary School
Sandhurst Junior School	Athelney School
Torridon Infants School	Elfrida Primary School
Torridon Junior School	St Augustine's R C Primary School

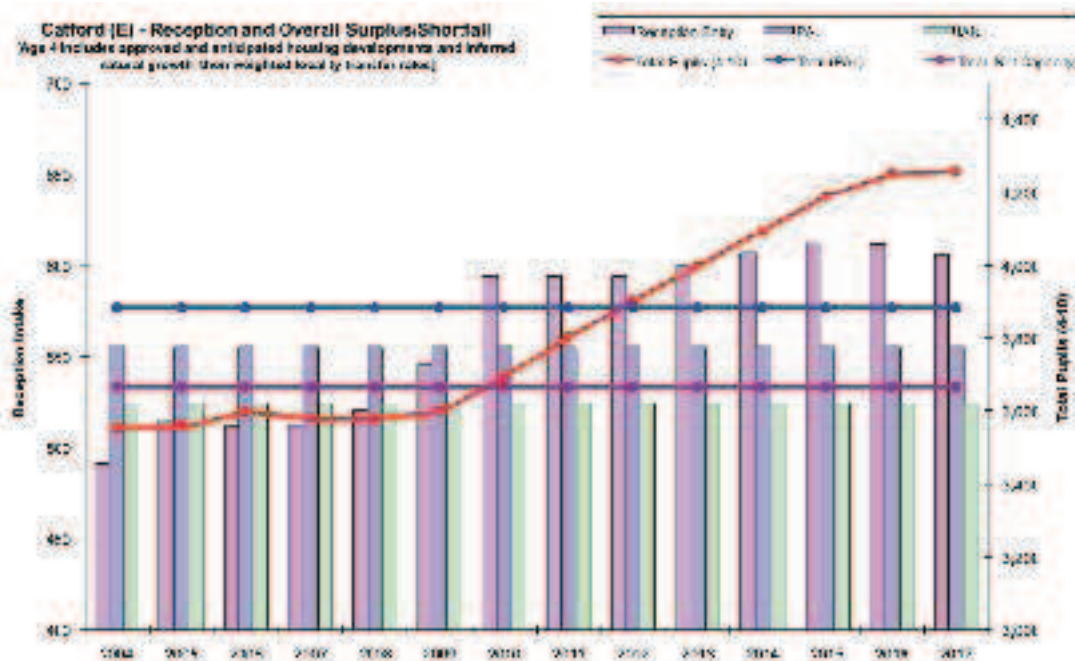
5.7.1 Chart 8 below shows that:

- The Reception PAL (555) is predicted to be overtaken in 2009 by 10, and in 2010 there is a projected Reception shortfall of 39 (1fe+). The

Reception intake continues to rise to a high of 612 in 2015, a shortfall of 57 places (2fe), and reduces very slightly through to 2017.

- The total roll is currently below the total PAL, but there is a rising trend from 2008, so that the total net capacity (which is around 220 below total PAL) could fill by 2010 and total PAL could fill by 2012.
- As a result, there is a predicted potential total shortfall of 114 places by 2013, of 364 places by 2016, and of 373 places by 2017.

Chart 8



Other relevant data

- 5.7.2 Of the 12 schools in this locality, 4 are judged by the Authority to be good. Three schools are judged to be in need of additional support to raise standards.
- 5.7.3 There are 2 RC schools.
- 5.7.4 Two schools have 2.5 fe entry. Two sets of Infants and Junior schools are on adjacent sites.
- 5.7.5 One school is due to move into new buildings in 2009.
- 5.7.6 Three schools are in the top 16 Lewisham schools requiring conditions works, and 6 schools have significant suitability issues.
- 5.7.7 Four schools have sufficient site area to warrant further investigation of their capacity to move from current 2fe to 3fe if required.

Options for Change to provide future capacity

Initial Options	Total places Yield	Suggested programme priority
Address suitability issues in one school.	0	Tranche 2
Consider expansion of one school from 2fe to 3fe.	210	Tranche 2
Consider expansion of one school from 2fe to 3fe.	210	Tranche 3

TOTAL PLACES NEED	373	
TOTAL PLACES YIELD	420	

5.8 Locality H: Deptford and New Cross

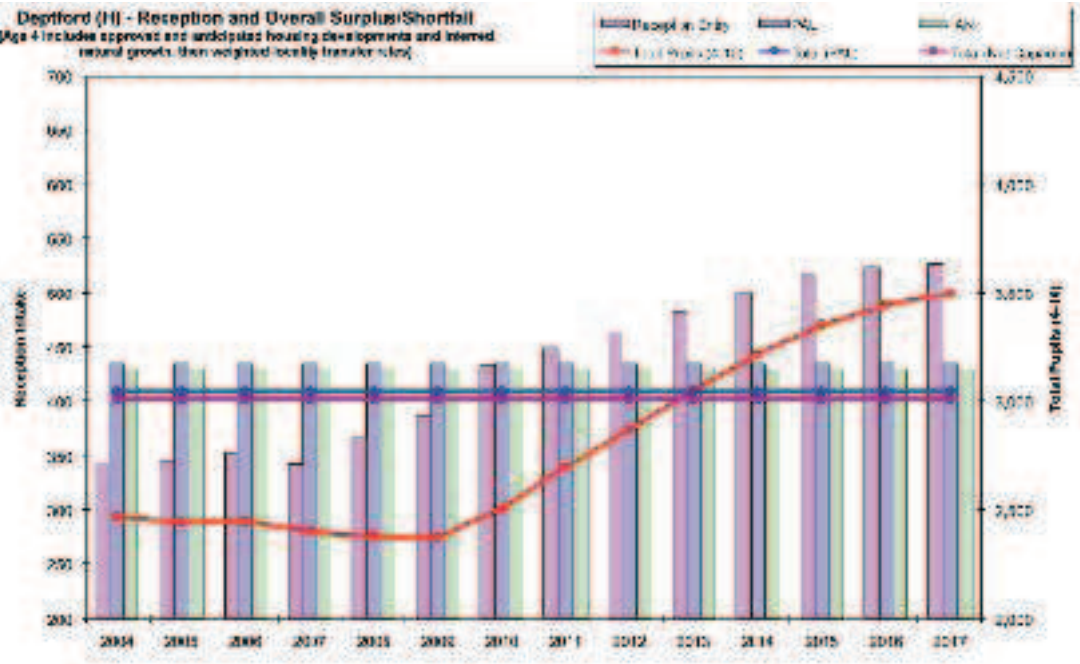
Locality Group H	
Sir Francis Drake Primary School	Childeric Primary School
Deptford Park Primary School	Kender School
Grinling Gibbons Primary School	Monson Primary School
St Joseph's R C Primary School	St James Hatcham C E Primary School
Tidemill Primary School	

5.8.1 Chart 9 below shows that:

- The Reception PAL (420) is predicted to be overtaken in 2010 by 12, and in 2011 there is a projected Reception shortfall of 29 (1fe). The Reception intake continues to rise as new housing makes a significant impact to a high of 527 in 2017, a shortfall of 107 places (3fe+), when the increasing trend starts to flatten out. It should be noted that these projections largely rely on approvals yet to be agreed and construction being delivered; therefore development of capacity needs to proceed cautiously.
- The total roll is currently well below the total PAL, but there is a steeply rising trend from 2009, so that the total net capacity (which is around 50 below total PAL) and the total PAL could fill by 2013.
- As a result, there is a potential predicted total shortfall of 174 places by 2014, of 398 places by 2016, and of 454 places by 2017.

Chart 9

Deptford (H) - Reception and Overall Surplus/Shortfall
 (Page 4 includes approved and anticipated housing developments and interest based growth, then weighted locally transfer rules)



Other relevant data

- 5.8.2 Of the 9 schools in this locality, 4 are judged by the Authority to be good or outstanding. Five schools are judged to be in need of additional support to raise standards.
- 5.8.3 There is 1 RC and 1 CE school.
- 5.8.4 One school has 1.5 fe entry, but has agreed to reduce to 1fe from September 2009, initially for 1 year.
- 5.8.5 One school moved into new buildings in January 2008. Another is part of a proposal to be incorporated into an existing Academy and, if that were to proceed, will be refurbished. Another is planned to be rebuilt as part of an area of borough regeneration.
- 5.8.6 Three schools are in the top 16 Lewisham schools requiring conditions works, and 2 schools have significant suitability issues.
- 5.8.7 Two schools have sufficient site area to warrant further investigation of their capacity to increase by 1fe if required.

Options for Change to provide future capacity

Initial Options	Total places Yield	Suggested programme priority
Expand one school by 1fe.	210	Tranche 2
Improve conditions and suitability of one school.	0	Tranche 2 (CE Diocese)
Expand one school by 1fe.	210	Tranche 3
TOTAL PLACES NEED	454	
TOTAL PLACES YIELD	420	

5.9 Locality I: Downham

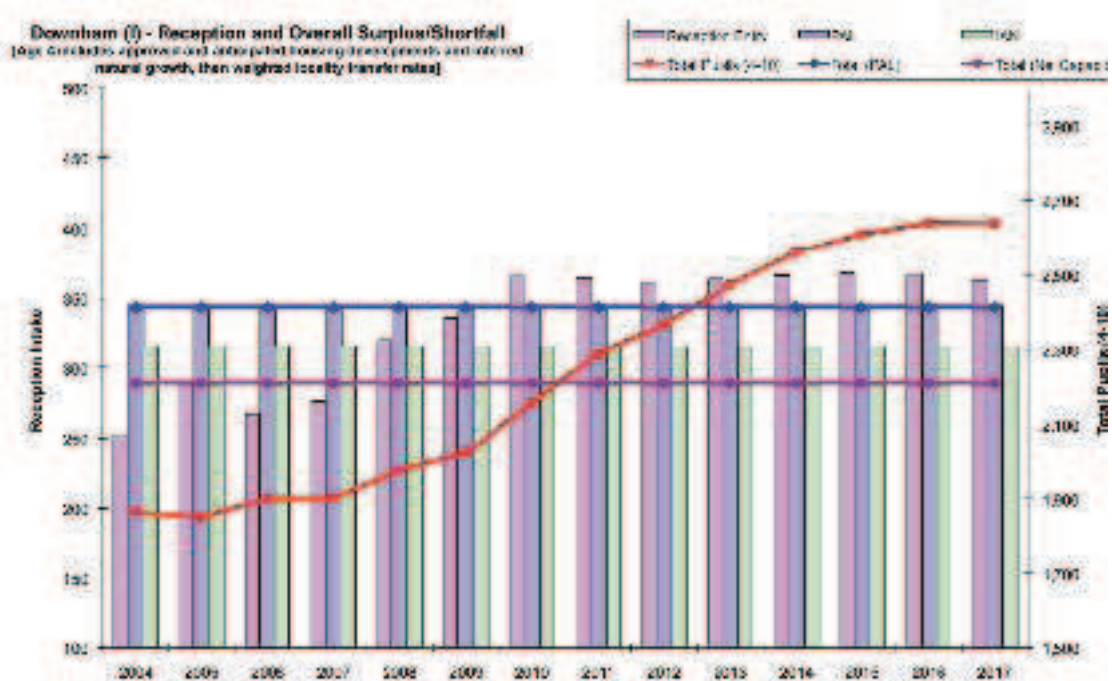
Locality Group I	
Downderry Primary School	Rangefield Primary School
Good Shepherd R C Primary School	St John Baptist C E Primary School
Launcelot Primary School	Marvels Lane Primary School
Merlin Primary School	

5.9.1 Chart 10 below shows that:

- The Reception PAL (345) is predicted to be overtaken in 2010 by 20, and remains relatively flat thereafter until 2017.

- The total roll is currently well below the total PAL, but there is a rising trend from 2007, so that the total net capacity (which is around 60 below total PAL) could fill by 2011 and the total PAL could fill by 2013.
- As a result, there is a potential predicted total shortfall of 58 places by 2013, of 145 places by 2014, and of 226 places by 2016.

Chart 10



Other relevant data

- 5.9.2 Of the 7 schools in this locality, 2 are judged by the Authority to be good. Five schools are judged to be in need of additional support to raise standards.
- 5.9.3 There is 1 RC school.
- 5.9.4 One school has 1.5 fe entry.
- 5.9.5 One school is in the top 16 Lewisham schools requiring conditions works, and 5 schools have significant suitability issues.
- 5.9.6 Three schools have sufficient site area to warrant further investigation of their capacity to move from current 2fe to 3fe if required.

Options for Change to provide future capacity

Initial Options	Total places Yield	Suggested programme priority based on need for places
Improve conditions and suitability at one school.	0	T2
Improve conditions and suitability at one school and consult on addressing its half form entry.	0	T2
Expand one school from 2fe to 3fe.	210	T3
TOTAL PLACES NEED	223	
TOTAL PLACES YIELD	210	

5.10 Initial Investment Priorities

5.10.1 The aims of the of the primary capital programme are set out above in 5.2. Those aims have determined the options for change set out for each locality across the Borough in rest of section 5 of the report. However the resources available from the primary capital programme and other identified sources will not be sufficient to deliver the options set out for all localities.

5.10.2 In moving to investment decisions, the aims at 5.2.2 have been used to determine priorities in terms of the extent to which a proposal will:

1. Provide sufficient places at the right time to meet future needs within and between planning localities in the Borough;
2. Improve conditions and suitability of schools in order to raise standards;
3. Increase the influence of successful and popular schools;
4. Maximise the efficient delivery of education in relation to size of school, removing half-form entries, and promoting continuities of education;
5. Enable school extended services for pupils, parents and communities;
6. Optimise the use of the Council's capital resources available for investment.

5.10.3 Ensuring that sufficient places are provided in localities at the right time will take precedence over significant investment in schools where the rectification of conditions and suitability issues will not produce additional places.

5.10.4 Reductions in school PALs will be discussed with schools as more secure information is derived from actual places data against GLA projections. The LA will seek to avoid short term turbulence in taking down a PAL if there is evidence of the likelihood of medium term expansion.

5.10.5 Indicative costings for Tranche 1 proposals are based on the following estimates:

- The cost of building a new 3fe Primary school with Nursery is approximately £10.5 million. A refurbishment would cost in the region of £8 million.
- The cost of building a new 2fe Primary school with Nursery is approximately £7.7 million. A refurbishment would cost in the region of £5 million
- The cost of an expansion of 0.5 forms of entry (105 children) would be approximately £2.7 million, and of 1fe (210 children) £5.4 million.

These figures will be adjusted in the light of feasibility studies.

Tranche 1 investment priorities: Proposals

	Locality	Child Yield	Comments in relation to criteria	Estimated cost (£m)
New build (or refurbishment) of Gordonbrock to expand from 2.5 fe to 3fe	C Brockley, Lewisham, Telegraph Hill	105	Meets increased locality need for places in a good school, improves conditions and suitability , creates full teaching groups	
New build of Brockley to expand from 1fe to 2fe.	C Brockley, Lewisham, Telegraph Hill	210	Meets increased locality need for places, improves conditions and suitability	
Expand St Barts from 1.5 fe to 2 fe.	A Forest Hill - Sydenham	105	Meets increased locality need for places, improves conditions and suitability , creates full teaching groups	
Expand Our Lady & St Philip RC from 1.5 fe to 2 fe.	A Forest Hill - Sydenham	105	Meets increased locality need for places, creates full teaching groups	
Totals		525		
Expand Dalmain from 1.5 fe to 2 fe. (RESERVE)	A Forest Hill - Sydenham	105	Meets increased locality need for places in a good school, improves suitability , creates full teaching groups	
Expand Kilmorie from 1.5 fe to 2 fe. (RESERVE)	A Forest Hill - Sydenham	105	Meets increased locality need for places in a good school, creates full teaching groups	

Tranche 2 investment priorities: Options

These options will be reviewed in the light of actual locality increases/decreases against LGA predictions

	Locality	Child Yield
Expand a good school by 1fe.	B Lee Green	210
Expand an Infant and a Junior School from 1.5fe to 2 fe	B Lee Green	105
Address suitability issues in one school.	E Catford, Bellingham, Grove Park	0
Consider expansion of one school from 2fe to 3fe.	E Catford, Bellingham, Grove Park	210
Expand one school by 1fe.	H Deptford, New Cross	210
Improve conditions and suitability of one school.	H Deptford, New Cross	0
Improve conditions and suitability at one school.	I Downham	0
Improve conditions and suitability at one school and consult on addressing its half form entry.	I Downham	0
Totals		735

Tranche 3 investment priorities: Options

These options will be reviewed in the light of actual locality increases/decreases against LGA predictions

	Locality	Child Yield
Expand a high performing 2fe school to 3fe	A Forest Hill – Sydenham	210
Expand a good school by 1fe	B Lee Green	210
Consider other options for realising increased capacity as required	C Brockley, Lewisham, Telegraph Hill	630
Consider expansion of one school from 2fe to 3fe.	E Catford, Bellingham,	210

	Grove Park	
Expand one school by 1fe.	H Deptford, New Cross	210
Expand one school from 2fe to 3fe	I Downham	210
Totals		1680

5.11 Our approach to change

Overall Governance

5.11.1 The approval of the Primary Strategy for Change is a key decision for the Mayor.

5.11.2 Given the variety of funding resources for the delivery the strategy and the fact that funding is only announced in three year funding tranches then each tranche of investment activity will require a decision by the Mayor.

The LEP

5.11.3 The intention is to procure the delivery of the PCP using the Local Education Partnership (LEP). There will therefore need to be a structure for the finalisation of options and their formal route to procurement. It is proposed that arrangements similar to those for the Building Schools for the Future (BSF) programme for secondary schools are adopted. These would look as follows.

5.11.4 A Primary Strategic Partnering Board (PSPB) would be established with identical or similar membership to the existing SPB under BSF. The officers supporting the Heads reference group would bring investment options to the PSPB after they had been discussed within the Heads reference group. The PSPB would then shape, guide and approve the projects.

5.11.5 Projects approved by the PSPB would then be offered to the LEP for delivery. Once a viable project with funding has been established there would be an approval required from the Mayor.

Schools

- 5.11.6 The Primary Strategic Meeting of Heads will be the key consultative body on the overall primary strategy for change and its implementation. The Primary Strategic will be supported in this task by a Heads reference group. The group will be made up of two heads from each of the locality planning areas plus a representative from each of the dioceses. The Primary Strategic will maintain the Heads membership of the Reference Group
- 5.11.7 The reference group will be involved in the defining of data it feels appropriate to the development of investment options. The group will analyse the data provided. The group will be serviced by officers in providing the data, interpreting it and supporting the subsequent development of options.
- 5.11.8 The Head of Education Development will be responsible for leading initial consultations with individual schools in order to support the process of options development.
- 5.11.9 The work of the Reference Group will be reported upon regularly to the Primary Strategic.
- 5.11.10 The implementation of the Primary Strategy for Change will have implications for the deployment of Dedicated Schools Grant (DSG) resources. It is therefore important that the Schools Forum considers these implications and how they might be responded to. In the short term it would be appropriate for a sub-group to be established to identify the issues and develop an approach to dealing with them. Longer term, the decisions on the use of DSG to support the PCP would form a part of normal business.

6 Results of initial consultation

Head Teachers

- 6.1 In the autumn of 2006 the foundations for a consultative process were established involving Head teachers, Governors and diocesan representatives. The outcome of that work was a set of principles and criteria. These are set out in Appendix 2 of the report. In addition Heads agreed the 6 planning localities and the general approaches to places planning.
- 6.2 In March 2008 information on the process for producing the strategy was shared at Heads Executive briefing and there was a testing of it and some changes made in the light of the discussions.
- 6.3 A workshop took place with the Heads' reference group using the agreed process to examine the data in detail as well as build on the earlier work on principles and criteria. These criteria are reproduced at 5.10.2 in the report.

- 6.4 The workshop considered the changed context of significantly growing pupil projections alongside the data on assets and schools' performance. In discussions there was a consensus around the issue of the management challenge posed by half forms of entry and that their removal should, where possible, feature as part of the programme. It was clear that either upward or downward adjustments' would be possible in this process.
- 6.5 The size of school was considered in the workshop, and while there was a preference for one and two form entry schools, that did not rule out the creation of larger schools to meet the demand for places and to achieve greater efficiencies in provision. It was recognised that larger schools might pose some greater management challenges and that some parents might prefer the intimacy of smaller schools. However, these views of current Head teachers were not to rule out the possibility that future Heads may see more benefits in larger primary schools.
- 6.6 The group considered the possibility of re-locating a successful school on a site with deficiencies to one that could be expanded perhaps through the amalgamation of two existing schools.
- 6.7 A variety of other issues were raised in terms of developing sites some of these were:
- Ease and safety of transport access to the site;
 - The scope for development to include other community facilities;
 - If there is significant mainstream expansion will there need to be expansion of behaviour support facilities such as New Woodlands;
 - How feasible upward expansion would be on some sites;
 - The opportunities for decanting pupils during rebuilding projects.
 - Concerns were raised over whether the estate and asset information is up to date for schools. While asset information is kept as updated as possible, further consultation on asset information will be carried out with schools.

Dioceses

- 6.8 In discussion with the Dioceses they have raised issues about the procurement route for any new investment on their sites. They have concerns that proposals to use the Local Education Partnership (LEP) to develop VA sites does not reflect fully their particular legal status. In particular there are issues about the fact that there is no contractual relationship between the dioceses and the LEP and what should happen if something should go wrong during an investment project.
- 6.9 The timing of VA projects is very important to the dioceses as they are required to make their 10% contribution to these projects. The profiling of projects across the diocesan area is of great significance as they will need to plan carefully the disposition of their available resources to contribute toward primary capital programme projects.

7 Next Steps

- 7.1 Further consultation with stakeholders is planned prior to the submission of the Primary Strategy for Change, and with Tranche 1 headteachers and governors during the remainder of the summer term on the delivery of their projects.
- 7.2 Governance arrangements will be made, and negotiations with the LEP on the delivery of the programme.

8 Financial Implications

- 8.1 This report has identified three tranches of investment activity for the period 2009 to 2017 with the first tranche covering two years, and the second and third tranches each covering three years. These periods are intended to match the current three year budget planning periods used by central government for financial planning. This report focuses on investment proposals for the first tranche 2009 – 11. The proposals in this report relate to Tranche 1 and fall within the capital resources made available to the Council for schools capital expenditure by central government for the period 2008 - 2011.
- 8.2 The Government has made available resources of £11.1m as capital grant for the implementation of the Primary Capital Programme for the period 2009 – 11. In addition there are resources available as supported capital of £13.9m to meet the demand for additional places in the borough. The DCSF is clear that it expects local authorities to use the PCP capital to lever in other capital resources. The Council has available capital grant resources for the development of extended services in schools to deliver 8am to 6pm wrap around support. The resources for 2008 -09 are being committed to a number of minor projects to continue the delivery of the national agenda. For the period 2009 – 11 the resources of £0.75m are being pooled with other primary capital resources to support the overall delivery of the Tranche 1 investment.
- 8.3 The Government makes capital grant available to schools in the shape of Devolved Formula Capital for them to use on minor capital maintenance and development of their school assets. A one form entry primary school would attract £26k on average and a three form entry school £46k. Once a school has been modernised or rebuilt the allocation reduces to reflect the lower lifecycle maintenance costs such schools will experience. It is proposed that schools pool their DFC for the last two years before renewal and for the first two years after renewal as a contribution toward the capital costs of the investment programme. A reduction would be made for the element of DFC (20%) intended for supporting the costs of ICT infrastructure. This approach could contribute c£0.5m toward the Tranche 1 costs. If this was not agreed then it would be necessary to fall back upon Basic Need funding.
- 8.4 The estimated cost of the Tranche 1 programme is £23.6m. However as two of the proposals involve voluntary aided schools the LA would expect 10% of that share of the costs to be funded by the respective dioceses. This would reduce the cost to the Council by approximately £0.5m. The Locally Co-ordinated Voluntary Aided Programme also provides the equivalent of basic need support for VA schools. This is a grant rather than a supported capital allocation. On the basis of the above the funding would be made up as follows:

£m

PCP Grant		11.1	
Extended Services Grant		0.7	
Schools DFC		0.5	
Diocesan contribution	10%		0.6
LCVAP		1.2	
Basic Need Supported Capital		9.6	
Total		23.6	

- 8.5 The use of supported capital requires the Council to take out loans to finance the capital expenditure. As Lewisham, like many other London authorities, is on the revenue support funding floor the take up of supported borrowing does not attract additional revenue support in future years to meet the cost of the borrowing. In this instance the use of supported borrowing will have a direct consequence for the revenue budget of the Council. At current interest rates (5.9%) each £5m of borrowing incurs an annual debt financing cost of £328k, based on borrowing over 40 years – the expected life of school assets. On the basis of the above profile the debt financing cost to the revenue budget would be £630k.
- 8.6 The revenue resources to meet the additional costs of £630k would need to be taken account of in the overall treasury management strategy. Any variations in the revenue implications would need to be accounted for within the overall budget strategy. The new build schools will be more efficient to run than the existing assets in terms of energy costs and will contribute to a lower need for asset maintenance costs. This might form the basis of an argument that some DSG resources are utilised to support an element of these additional revenue costs.
- 8.7 Given the size of the potential growth in pupil numbers it is unlikely that any release of assets will result from this Tranche 1 programme of investment that could increase the Council's capital resources and so mitigate the costs of the programme.
- 8.8 If the proposed level of resourcing cannot be sustained because of the revenue budget consequences, the level of investment for Tranche 1 would need to be reduced to the available funding envelope.
- 8.9 The community school projects within the Tranche 1 programme will require additional clienting support which can be contained within the existing budget of the Estates Management Unit. The detailed feasibility study work that will be necessary will be funded from the CYP CERA provision.
- 8.10 For Tranches 2 and 3 the Authority will review the potential for the generation of capital receipts from the sale of sites or parts of site where it will support rather than compromise the realisation of the aims of Lewisham's Primary Strategy for Change.

9. Risk

- 9.1 A significant risk exists around the projections of pupil numbers. The strategy set out is cautious in its response to the projections based upon past experience of their not being achieved. If projections are achieved as quickly as forecast, there may be pressures on identifying places for all those seeking them at the time they are being sought. If the projections are realised more slowly, then surpluses may persist for longer than anticipated, thus creating some management and staffing issues for individual schools, and placing pressures on the Authority in relation to the DCSF guidance on percentages of surplus places both within schools and across the Borough.
- 9.2 The funding resources are finite and if pupil projections are realised in full they may be insufficient to meet the demand.
- 9.3 The Tranche 1 programme assumes that schools and dioceses are able to make contributions to the overall funding envelope as they intend, but this may not prove possible in full.
- 9.4 The strategy anticipates that the procurement of these schemes will be through the LEP. The LEP has significant commitments in delivering the secondary BSF programme and may have difficulty in securing the resources to deliver these primary projects.
- 9.5 In undertaking the detailed feasibility work on each of the projects, issues may be identified that challenge the delivery within the anticipated time scale and available resources.

10 Legal Implications

- 10.1 The Human rights Act 1998 safeguards the rights of children in the Borough to educational provision, which the Council is empowered to provide in accordance with its duties under domestic legislation.
- 10.2 Section 14 of the Education Act 1996 obliges each local authority to ensure that there are sufficient primary and secondary schools available for its area i.e. the London Borough of Lewisham, although there is no requirement that those places should be exclusively in the area. The Authority is not itself obliged to provide all the schools required, but to secure that they are available.
- 10.3 In exercising its responsibilities under section 14 of the Education Act 1996 a local authority must do so with a view to securing diversity in the provision of schools and increasing opportunities for parental choice.
- 10.4 The Education and Inspections Act 2006 places requirements on Authorities to make their significant strategic decisions concerning the

number and variety of school places in their localities against two overriding criteria:

- to secure schools likely to maximise student potential and achievement;
- to secure diversity and choice in the range of school places on offer.

10.5 Section 19 of the Education and Inspections Act 2006 provides that where a local authority or the governing body of a maintained school proposes to make a prescribed alteration to a maintained school and it is permitted to make that alteration, it must publish proposals.

10.6 The School Organisation (Prescribed Alterations to maintained Schools) (England) Regulations 2007 provides that proposed enlargements of school premises which would increase the capacity of the school by more than 30 pupils and by 25% or 200 pupils (whichever is the lesser), or where there is a proposed increase in the number of pupils in any relevant age group by 27 or more, are prescribed alterations which means that statutory proposals have to be published, and there must be a period of four weeks for representations before a decision is made.

10.7 The Council, before making any decision regarding the expansion of a school, must ensure that capital funding is in place, interested parties have been consulted, the statutory notice is published and there has been a four week period for representation.

11 Crime and Disorder

None

12 Equalities

No equalities implications result from this report but the subsequent Primary Strategy for Change document may have implications.

13 Environmental Implications

The Primary Capital Programme will seek to enhance the environments of schools and their grounds.

BACKGROUND PAPERS

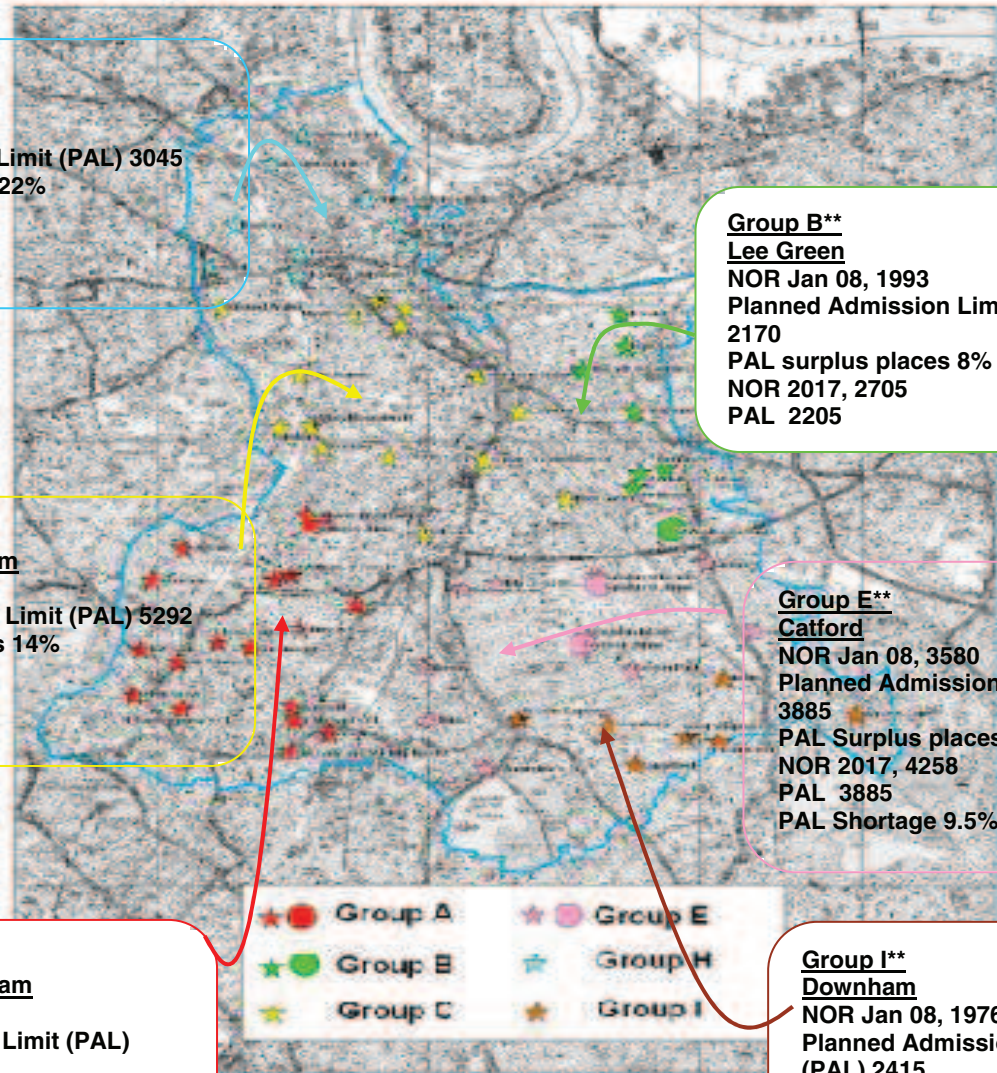
<u>Short title of Document</u>	<u>Date of Document</u>	<u>Location</u>	<u>Ref.</u>	<u>Contact Officer</u>
Review of Primary Places in Lewisham Schools	16.01.2008			<u>Alan Docksey</u>

For more information about this report, please contact Chris Threlfall Head of Education Development, Children & Young People Directorate on 020 8314 9971.

Appendix 1

Place Planning Localities for Lewisham: Jan 2008 School Census

Primary School Localities Jan 07



Group H**
Deptford
 NOR Jan 08 2388
 Planned Admission Limit (PAL) 3045
 PAL Surplus places 22%
 NOR 2017, 3499
 PAL 2940
 PAL Shortage 16%

Group B**
Lee Green
 NOR Jan 08, 1993
 Planned Admission Limit (PAL) 2170
 PAL surplus places 8%
 NOR 2017, 2705
 PAL 2205

Group C**
Brockley - Lewisham
 NOR Jan 08, 4532
 Planned admission Limit (PAL) 5292
 PAL Surplus places 14%
 NOR 2017, 5938
 PAL 4977
 PAL Shortage 19%

Group E**
Catford
 NOR Jan 08, 3580
 Planned Admission Limit (PAL) 3885
 PAL Surplus places 8%
 NOR 2017, 4258
 PAL 3885
 PAL Shortage 9.5%

Group A**
Forest Hill - Sydenham
 NOR Jan 08, 5153
 Planned Admission Limit (PAL) 5775
 PAL Surplus places 11%
 NOR 2017, 6379
 PAL 5670
 PAL Shortage 12.5%

Group I**
Downham
 NOR Jan 08, 1976
 Planned Admission Limit (PAL) 2415
 PAL Surplus places 18%
 NOR 2017, 2638
 PAL 2415
 PAL Shortage 9%

Locality Group A Forest Hill – Sydenham
Adamsrill Primary School
Christ Church C E Primary School
Kilmorie Primary School
Our Lady & St Philip Neri R C Primary Sc
Haseltine Primary School
Rathfern Primary School
Perrymount Primary School
Fairlawn Primary School
Horniman Primary School
Dalmain Primary School
Stillness Infants School
Stillness Junior School
St William Of York R C School
Eliot Bank Primary School
Holy Trinity C E Primary School
St Bartholomew's C E Junior And Infant School
St Michael's CE Junior And Infant School
Kelvin Grove Primary School

Locality Group B Lee Green
All Saints C E Primary School
John Ball Primary School
Our Lady Of Lourdes R C Primary School
Brindishe Primary School
Lee Manor
St Winifred's Infant School
St Winifred's Junior School
St Margaret's Lee C E Junior And Infants

Locality Group C Brockley – Lewisham – Telegraph Hill
--

Ashmead Primary School
Brockley Primary School
Lucas Vale Primary School
Lewisham Bridge School
St Mary Magdalene Catholic Primary School
St Stephen's C E Primary School
Turnham Primary School
Edmund Waller Primary School
John Stainer Primary School
Myatt Garden School
Gordonbrock Primary School
St Saviour's R C Primary School
Hither Green Primary School
St Mary's Lewisham C E Primary School
Holbeach Primary School

Locality Group E Catford –Bellingham – Grove Park
--

Baring Primary School
Coopers Lane Primary School
Sandhurst Infants And Nursery School
Sandhurst Junior School
Torridon Infants School
Torridon Junior School
Forster Park Primary School
Holy Cross R C Primary School
Rushey Green Primary School
Athelney School
Elfrida Primary School
St Augustine's R C Primary School

Locality Group H Deptford –New Cross
Sir Francis Drake Primary School
Deptford Park Primary School
Grinling Gibbons Primary School
St Joseph's R C Primary School
Tidemill Primary School
Childeric Primary School
Kender School
Monson Primary School
St James Hatcham C E Primary School

Locality Group I Downham
Downderry Primary School
Good Shepherd R C Primary School
Launcelot Primary School
Merlin Primary School
Rangefield Primary School
St John Baptist C E Primary School
Marvels Lane Primary School

Appendix 2

Principles and Criteria agreed with stakeholders

The following principles were agreed to inform the formal conduct of the review:

- The best interests of each and every child and a secure choice for parents and carers
- Continuous improvement in children's service provision
- Value for money
- Consultation and involvement of all stakeholders in decision making

The following criteria were agreed through early informal consultation:

- Reduce surplus places and provide places where they are needed to meet demand
- No school should have a surplus capacity of more than 15%
- The minimum number of pupils (Reception class to Year 6) in a primary school should normally be no fewer than 210 (1 form of entry).
- Enhance capacity to raise standards, reduce risk of under-performance or serious weakness, and offer extended schools
- Increase the capacity of schools to provide single year group classes
- Meet parental entitlement to have access to a quality school located within the local community. (The DCSF has defined local as being within a 2 mile radius.)
- No pupil should have to cross significant barriers to access a school. The consultation will set out what is regarded as a barrier in key geographical locations (e.g. the main railway line).
- Consider the development and delivery of extended services. The review will take into account the extended services provided within the school's collaborative for families and wider community.
- Enhance community engagement. The review will take into account the needs of each community and the contribution that each school plays in relation to community achievement of the best possible outcomes for all young people and their families. Impact of proposals on faith communities and areas of deprivation will be taken into account.
- Increase opportunities for inclusive provision of services. In deciding on any reorganisation of primary provision, the review would need to ensure that proposals are not detrimental to the needs of vulnerable groups.
- The review should be designed to improve the condition and suitability of school-based provision. The review will consider the condition and suitability of school premises, including recent capital investment and accessibility issues, and future investment through the Primary Capital Programme.

- The review will be designed to assure Value for Money in the provision of services. The review will consider the financial viability of the school and include in the analysis an open discussion of potential capital receipts.
- The review will consider appropriate 'Safety net' levels of surplus place provision. It is sensible to maintain a safety net of surplus places above the level of the projected primary pupil population. The consultation will set out the implications of several 'safety net levels' and the implications for the number of planned surplus places in individual schools/ localities.
- Enhance the capacity for schools to work collaboratively and federatively in order to manage supply and demand effectively in locality areas.

Mayor & Cabinet		
Report Title	Strengthening Specialist Provision for Children with Special Educational Needs	
Key Decision	Yes	
Ward	All	
Contributors	Executive Directors for Children and Young People, Regeneration, Resources, Head of Law & Head of Access & Support	
Class		Date: 03.10.07

1. Summary

1.1 This report sets out the response to the formal consultation on the Strengthening of Provision for Children with Special Educational Needs Proposals. Taking account of the consultation it sets out proposals for the future organisation of provision for children with special educational needs in mainstream and special schools and services needed to support them.

2. Purpose of Report

2.1 This report is seeking the Mayor's approval to improve provision for children with special educational needs so that there is a continuum of provision of special schools, specialist resource bases in mainstream and mainstream provision. It proposes that a range of specialist provision is made for children with SEN. Proposals also include a management of change programme to be developed that will increase the range of training available to Lewisham teachers and support staff.

3. Policy Context

3.1 Lewisham's Children and Young People's Plan sets out our vision for improving outcomes for all children. It articulates the need to improve outcomes for children with SEN and disabilities by ensuring that their needs are met. This is consistent with the Government's 10 year strategy Removing Barriers to Achievement which sets out five key objectives:

- Build capacity in the children's workforce to enable them to identify and meet children's needs
- Promote a continuum of local provision
- Improve accountability for the outcomes children achieve
- Strengthen partnerships with parents and children
- Improve provision for children with Behavioural, Emotional and Social Difficulties and children with Autism.

4. Recommendations

4.1 That the Mayor:

4.1.1 notes the outcomes of the formal consultation;

4.1.2 considers whether to endorse the principles set out in Section 10 to underpin Lewisham's policy and provision for children with SEN;

- 4.1.3 agrees to increase capacity of mainstream schools to meet children's SEN and approve a range of measures to enhance this capacity as summarised in Section 12;
- 4.1.4 agrees to the publication of statutory proposals to change the provision at the following primary schools to provide new resource bases with specialist staff for children with SEN:
- John Ball Primary – Autistic Spectrum Disorder (ASD)
 - Tidemill Primary – Speech Language and Communication Needs (SLCN)
 - Perrymount Primary – Complex Physical and Medical needs
 - Forster Park Primary – Speech Language and Communication (SLCN);
- 4.2 agrees to the publication of statutory proposals to change the provision at the following secondary schools to provide new resource bases with specialist staff for children with SEN:
- Catford High – Learning Difficulty and Disability
 - Addey & Stanhope - Speech Language and Communication Needs;
- 4.3 considers whether, in light of consultation, to increase specialist primary places further and, if so, to ask officers to begin consultation on a change of provision at Holbeach Primary to provide a new resource base with specialist staff for children with Autistic Spectrum Disorder (ASD);
- 4.4 considers whether, in light of consultation, to increase specialist secondary places further and, if so, to ask officers to begin consultation on a change of provision at Bonus Pastor Secondary School to provide a new resource base with specialist staff for children with Speech Language and Communication Needs;
- 4.5 considers the revised accommodation strategy and agrees to the publication of statutory proposals to change the location and provision at Brent Knoll school as set out at paragraph 12.15;
- 4.6 if recommendation 4.5 is agreed then to consider whether to delay the phasing out of the primary provision at Brent Knoll until sufficient primary resource base places are available;
- 4.7 agrees to begin the competition process for the establishment of a new ASD school for children aged 4 – 19 on the Pendragon School site and to begin the statutory process for the associated closure of Meadowgate and Pendragon Special Schools;
- 4.8 considers whether, in light of consultation, to develop a new ASD outreach service in advance of the new school opening;
- 4.9 agrees that the medical service be managed by Abbey Manor College;
- 4.10 considers whether, in light of consultation, the Parent Partnership Service should be extended in order to strengthen the partnership with parents.
- 4.11 agrees that monitoring and accountability arrangements for SEN are strengthened.

5. Background

- 5.1 The Local Authority (LA) has a duty under the Education Act 1996 to secure a sufficient number of school places to meet the needs of the local child population. It requires the LA in particular to have regard to the need to secure that special educational provision is made for pupils with SEN. Section 315 requires LAs to keep their arrangements for SEN provision under review.
- 5.2 The Government expects that there should be a range of provision for children who have special educational needs. This includes provision in mainstream and special schools and provision in specialist resource bases in mainstream schools. The OFSTED Report – “Inclusion: does it matter where pupils are taught?” (2006) concluded that the key to improved outcomes for children with SEN access to specialist teaching and that, when this is provided in a mainstream school, pupils can make better progress and have a more rounded experience.
- 5.3 In reviewing the capacity of Lewisham schools, consideration therefore has to be given to the type and range of provision in order to meet needs appropriately. The intention is to ensure that all children, wherever they are educated, have a good education that enables them to achieve to the full and prepares them well for adult life.
- 5.4 A report to Children and Young People Select Committee on 4 July 2006 set out the capacity of Lewisham schools in meeting the needs of pupils with special educational needs. It showed that current provision of specialist places is insufficient and many pupils have to travel to schools outside the borough. The report made some suggestions on how to restructure provision in order to meet demand for places in the future. It was agreed that informal consultation should take place in order to obtain opinion about options to be considered as part of a formal consultation process.
- 5.5 Informal consultation with stakeholders was carried out during the Autumn Term 2006. This included the special schools directly affected, mainstream schools, parents, students, trade unions, voluntary organisations and professionals providing services to children. Following the informal consultation, the options were modified and a report was prepared for Mayor and Cabinet on 10 January 2007 seeking agreement to formal consultation.
- 5.6 The report to Mayor and Cabinet on 10 January 2007 included statistical evidence that Lewisham has a relatively high proportion of children with statements of SEN as a proportion of all children aged 0-19. In 2006 this was 2.3% compared with 2.08% for London and 1.98% nationally. The number of pupils with a statement has declined slightly in recent years but is still relatively high compared to our statistical neighbours. This reflects in part the progress other local authorities have made in delegating or devolving funding to schools to support pupils with SEN.
- 5.7 Of the children with statements, about half are in special schools. The number of Lewisham children placed in maintained special schools (5-15 population) is a significantly higher percentage than nationally and compared with some other London boroughs. This indicates a lack of range of provision so that parents have to choose either mainstream or special. A large number of pupils are placed in schools outside of the borough and, for those who attend daily, much time is wasted on travel. A significant number of children placed in special schools outside the borough have behaviour difficulties or autism. This reflects a lack of provision for these particular needs in the borough. Provision for children with behaviour difficulties has recently been expanded with the establishment of Key Stage 3 provision at New Woodlands School and the expansion of the outreach service from

that school. This is expected substantially to reduce the demand for out of borough places for children with behaviour difficulties.

- 5.8 Information provided to us by our colleagues at Lewisham Primary Care Trust shows a significant rise in the number of pupils diagnosed as being on the autistic spectrum. It is expected that this trend will continue so appropriate educational provision must be made for this type of need for the future within the borough.
- 5.9 In June 2007, Lewisham was inspected in a Joint Area Review. As part of this, inspectors considered the current provision for pupils with SEN. Feedback at the end of the inspection indicated that they were pleased to note that the LA had been reviewing specialist provision. They commented positively about the SEN Review and that it was timely that appropriate action is being taken to ensure adequate and appropriate provision to meet needs both now and in for future, and to reduce the high number of statements and children placed out of borough.

6. The Service

- 6.1 The Local Authority (LA) currently has a range of settings and establishments to deliver education to children who have special educational needs. Most children with special educational needs have their needs met in mainstream schools. Those with a statement of special educational needs will have extra support in their mainstream school. Children who have higher level needs may require specialist provision. This can be in the form of a place at a special school which specialises in the type of the difficulty the child has or in a specialist unit or resource in a mainstream school.
- 6.2 Children may be educated in a specialist setting (an early years setting, school or unit/resource) or establishment maintained by the LA within the borough or may attend a similar setting or establishment maintained by a neighbouring borough. A small number of children with severe and complex needs attend highly specialist schools outside of the borough which may be run by independent or charitable organisations. Many of these schools provide residential education.
- 6.3 The current configuration of provision in Lewisham is as follows:

Special Schools

New Woodlands School	Social, Emotional and Behavioural difficulty (Primary and KS3 of Secondary)
Abbey Manor College	Social, Emotional and Behavioural difficulty (KS4 of Secondary to age 16)
Meadowgate	Moderate Learning Difficulty and Autism (Primary)
Pendragon	Moderate Learning Difficulty and Autism (Secondary to age 16)
Brent Knoll	Mixed Learning Difficulty including Autism (Primary and Secondary to age 16)
Watergate	Severe and Profound Learning difficulty (Primary)

Greenvale Severe and Profound Learning difficulty
(Secondary to age 19).

Resource bases/Resource Bases

Rushey Green Hearing Impairment – Oral/Aural (Primary)

Coopers Lane Hearing Impairment – Total Communication
(Primary)

Sedgehill Hearing Impairment – Oral/Aural and to develop Total
Communication

Kilmorie Learning Difficulty and Disability (LDD)
(Primary)

Catford High Learning Difficulty and Disability
(Secondary to age 16)

Deptford Green Specific Learning Difficulty - dyslexia
(Secondary to age 16)

Sydenham Visual Impairment
(Secondary to age 16).

7. Assessment of Need

7.1 The population of children with SEN can be divided into two groups, children with high incidence/low level need and those with low incidence/high level need. Lewisham currently attaches resources to a child's statement of SEN using a matrix system, which is on a scale 3-8. The matrix is based on an assessment of the child's needs and the level of support required to enable the child to access education. Since April 2007 additional funding has been provided to schools to support children with lower level needs (matrix 3-5) so the headteacher can provide support without going through the lengthy assessment process. This applies only to children who have not already been issued with statements. As a consequence, from 2007-08 it is intended that a statement will only be provided for children with higher level need. This approach will align Lewisham with other local authorities.

7.2 The assessment of need in this section has been based upon 2005/06 pupil numbers and projects demand up to 2015/16. Two sets of projections have been calculated – Higher Level and Lower Level. The former assumes that all pupils currently in special schools are pupils with needs at matrix 6-8. We have also factored into this calculation projections from Health, particularly the estimate that 1.2-1.5% of the general population will have ASD. However, it is clear from a review of a sample that a proportion of pupils now in special school were recorded prior to joining those schools as having needs at matrix 3-5 (lower level need), and the majority of professionals agree that, in future, pupils like these should be adequately supported in mainstream. The forecast of Lewisham Resident pupils with statements is attached (Appendix 1).

Identification of Places Needed

7.3 The 2015-16 figures are used for the long term identification of places needed, considering pupils with high level needs. Additional estimates of numbers of places

for the years from now until 2015 will be used to ensure that provision continues to be made at the right level for existing pupils, including all those currently in special provision. There is a particularly high number of pupils with SLD in Year 4 in 2006-07 which has carried through in the tables to a high number in Year 13 in 2015-16. Despite this, we expect to see a gradual decline in the number of pupils with SLD, to a 'core' number. From this analysis it is clear that the area of greatest demand is places for children with ASD.

- 7.4 The tables below provide a comparison of the projections with the present numbers. It is estimated that there will be an additional 37 places required in the primary phase and 26 places in secondary (11-19) by 2015 (the latter reducing by about 12 when the high SLD cohort has moved through). The figures have made allowances for a predicted increase in the number of pupils entering Lewisham schools over the decade.

Number of pupils in 2006-07 with high level needs

Primary Need	3-11	11-16	16-19	Total
Autistic Spectrum Disorder	87	65	8	160
Behavioural, Emotional and Social Difficulties	26	86	7	119
Hearing Impairment	5	20	1	26
Moderate Learning Difficulties	28	136	18	182
Multi-Sensory Impairment	1	0	0	1
Physical Disabilities	23	20	4	47
Profound and Multiple Learning Difficulties	13	14	6	33
Speech, Language and Communication Needs	41	39	4	84
Severe Learning Difficulties	79	65	25	169
Specific Learning Difficulties	4	14	1	19
Visual Impairment	9	5	2	16
Total	316	464	76	856

2015-16 projections of pupils with high level needs

Primary Need	3-11	11-16	16-19	Total
Autistic Spectrum Disorder	149	140	27	316
Behavioural, Emotional and Social Difficulties	20	57	21	98
Hearing Impairment	10	21	3	35
Moderate Learning Difficulties	26	38	12	76
Multi-Sensory Impairment	0	1	0	1
Physical Disabilities	30	26	5	61
Profound and Multiple Learning Difficulties	21	8	5	34
Speech, Language and Communication Needs	23	40	10	73
Severe Learning Difficulties	61	61	58	180
Specific Learning Difficulties	4	15	7	26
Visual Impairment	9	9	2	20
Total	353	416	150	919

8. Principles

8.1 A well established set of principles has underpinned Lewisham's approach to SEN, these are:

- Every child who can be should be educated in a mainstream school;
- Support, training and resources should be provided to ensure that mainstream schools are confident and able to provide children with special needs with a high quality education;
- All special schools have an outreach function, to support and help to develop what mainstream schools offer;
- Children in special schools should have some opportunity, according to their needs, to learn alongside those in mainstream schools;
- Children and young people should be educated locally wherever possible;
- There needs to be a strong partnership between the Authority and parents; this requires good services and information;
- Resources from out-borough placements should be re-directed into mainstream schools;
- Early recognition of a child's needs and early intervention are vital. We will ensure funding is available at an earlier stage, not just through a statement;
- An efficient service for statutory assessment should be maintained for those children who still need it.

9. Consultation

Consultation Structure: Documents and Activities

9.1 Place Group, an education consultancy, was employed to run the consultation on behalf of the LA and to report the outcomes. Their report is attached in Appendix 2. Place ran nearly thirty focus groups of various interests, who were:

- Learners from each of the special schools mentioned in the proposals
- Learners with and without disabilities attending mainstream schools
- Lewisham learners at special schools outside the borough
- Staff from each of the special schools affected
- Staff from mainstream schools with potential specialist resource bases
- Professionals including teaching and support staff
- Parents using services provided particularly for children and young people with special educational needs
- Trade union representatives.

9.2 The purpose of the groups was not merely to discover the extent of agreement with consultation proposals but also to explore why there was agreement or not and to hear respondents' further ideas. In order to support discussion with the groups of young people with special educational needs, an "easy-read" version of the consultation document was produced for use by the adult leading the group.

9.3 There was also a consultation event for the public and another for professionals which was attended by staff from schools and the health service. The public event was visited by approximately 70 people but only 43 completed the attendance record, some of whom also participated in other group consultation activities, and the professionals' event by 55 people. Each was led by Place Group with a number of officers in attendance for discussion and to respond to questions.

9.4 Despite some people expressing concern that the summary document and questionnaire was written by officers to gain only the answers desired, Place Group

confirmed that respondents took the opportunity to write extensively about the proposals. Many wrote at some length about the broad issues, while ignoring the detail of specific questions, which made analysis more difficult than expected. However, the analysis was thorough, with particular care taken to check for consistency between the “yes/no” element of a response and the text which followed. A number of respondents appeared inconsistent, which reinforced the view that simply counting those who stated they are for or against a proposal does not necessarily give an accurate picture of respondents’ views.

- 9.5 The consultation allowed three different methods of response; a full consultation mixing qualitative and quantitative data, a shorter leaflet version of the full consultation, also containing qualitative and quantitative data, and letters addressed to the council. Overall the response to the consultation was relatively low. Only 186 responses were received of which 120 were full consultations, 62 leaflets and 4 letters. With these 186 responses, 95 stated that they had children currently attending school in Lewisham and 46 stated their child had a statement. It is estimated that 1 in 5 UK school children will have a special need at some time in their school career. In Lewisham this translates to approximately 6800 of the 33,947 school population (Warnock Report 1978). Therefore the total consultation response only accounts for the parents of 3% of the actual population of children with special educational needs.

The Consultation Process

- 9.6 The full consultation paper was based closely on the 10th January 2007 Report to Mayor and Cabinet, with some effort to address concerns raised in the informal consultation. This is attached as Appendix 3. This was the main document used for discussion. Copies were sent to the parents/carers of all Lewisham resident pupils with statements of special educational need, to Headteachers and Chairs of Governors of each Lewisham school, to all statutory consultees and a number of other organisations. A second, shorter version of the consultation paper was prepared and distributed through schools to parents of all children in mainstream provision. This version was also made available to the public through libraries and other information centres in Lewisham. Each document included a questionnaire for return by Freepost. Both versions were available to the public on the Lewisham council website and a facility was provided for responding on-line, as well as an email address to which questions could be addressed

10. Feedback on Current SEN Provision and the Underlying Principles

Current Provision

- 10.1 As a prelude to seeking stakeholder views on the proposals to Strengthen Specialist Provision for Children with Special Educational Needs they were also asked to comment on the current arrangements and the underlying principles.
- 10.2 42% of respondents did not express a view on this. Of those that did one in four were satisfied with current provision and three out of four were not. During the focus group discussions the consultants were able to explore and identify issues of dissatisfaction more clearly. Many of the concerns they raised are addressed within the proposals and will be dealt with later in the report. These were:
- The need for increased training and expertise within mainstream schools
 - Greater understanding of children’s needs throughout the mainstream schools
 - Greater availability of multi-agency input and in particular health and therapist services

- The need for more places for children with SEN and in particular for children with ASD
 - There should be greater strategic planning and communication between professionals
 - There should be more flexibility in services and higher levels of resources for children with emotional and behavioural difficulties
 - The requirement for properly designed facilities and premises that are accessible to students with SEN
 - Organisational changes are needed including changes to class size, policies and procedures to enable one to one support and create an inclusive culture to enable learners to be taught appropriately
- 10.3 There are two important issues that arose that fall outside of the proposals but do need to be addressed. The other issues are dealt with later in the report. These concerns can be broadly grouped together as follows:
- Dissatisfaction with the LA's management of the statutory SEN process, the use of statements and reducing reliance upon them
 - A desire for greater recognition of parental expertise and engagement with them. Higher levels and greater consistency of support to them including information and advice.

Commentary

Statutory Assessment and Reduction in Statements

- 10.4 Parents were unhappy about the length of time it took to get a statement and felt that it was the sole route for them to receive the support and services they needed. The statutory assessment process is a legal procedure with prescribed deadlines. It is bureaucratic and involves a considerable amount of time spent by professionals in assessing a child and writing reports. The timescale prescribed in the Education Act 1996 is six months (26 weeks) from the request for a statutory assessment to the issue of a final statement. However, there can be delays if reports from professionals are not received on time. Lewisham's performance in statutory assessment improved in 2006/7 and 98% of statutory assessments excluding valid exceptions, were completed within the 18 week timescale given from a decision to assess is agreed. Performance where valid exceptions were included showed 63% completed within the 18 weeks.
- 10.5 Some respondents suggested that an external agency should be responsible for carrying out the statutory assessment. However, the current arrangements for SEN are a matter of national policy and statute. Alternative proposals are outside the scope of this review.
- 10.6 Lewisham has taken steps to minimise the bureaucratic processes involved in the statutory assessment process. This is in line with Government's recommendations set out in 'Removing Barriers to Achievement'. Nearly all local authorities have now adopted similar approaches. In Lewisham, funding that was previously allocated through statements for children with lower level needs has now been made available directly to schools. This enables them to fund additional support without the need for a statement. This means that a child can get help quickly without needing to wait for the outcome of the lengthy assessment. Monitoring is through a variety of means including financial reports from schools, school improvement officer intervention, school inspection reports, school governors and individual education plans or provision management plans.

Parental Engagement

- 10.7 Improving outcomes for all children especially those with SEN is dependent upon a strong and secure partnership with parents. It is recognised that there have been tensions around assessment and placement of children. Placement of a child with a statement of special educational need is decided by Lewisham through its Special Educational Needs Panel. Places in special schools must be reserved for those children who have high level needs which cannot be met in a mainstream school. The decision making process by the SEN Panel is seen to be robust, as evidenced through the recent Joint Area Review inspection. However, this procedure may be seen by some parents as cumbersome and time consuming. Officers are required to follow this procedure to ensure consistency of approach. Every effort is made by officers to provide advice and information to parents in a sensitive and neutral way. Advice to parents about the statutory assessment process is also available through our Parent Partnership Service which is delivered through Lewisham Pre-School Learning Alliance and is independent of the Council.
- 10.8 It might be possible to address this concern by extending the Parent Partnership Service to strengthen the partnership and to facilitate greater engagement with parents. This is put forward for the Mayor to consider later in the report. Under this proposal, the Parent Partnership Service would extend its range and provide a more flexible service to parents. This could be achieved by creating a tiered service providing information and support and more targeted support for parents during the statutory assessment process. The service could cover children of all ages and enable development of expertise to support parents with transition planning, including working with the Connexions service. In the consultation some parents suggested forming a Reference Group to work with officers. This might be facilitated by the Parent Partnership Service.

Principles

- 10.9 38% expressed no views on the principles. Of those that did respond a little over half did not agree with Lewisham's principles. A higher number of parents from the primary sector than those from the secondary sector agree with the principles. A higher proportion of staff from mainstream schools agree with the principles than those from special schools. A higher proportion of parents with children with SEN in mainstream schools agreed with the principles than those with children at special schools.
- 10.10 Two principles appear to have generated the most debate and contention:
- * Every child who can be should be educated in a mainstream school
 - * An efficient service for statutory assessment should be maintained for those children who still need it
- 10.11 The second of these principles stimulated discussion about the statutory assessment process and the use of statements which has been addressed earlier in the report.
- 10.12 There were diverse views on the first principle. Some parents had strong views that although their children could attend a mainstream school it is not necessarily where they would want them to be, Some parents with children at mainstream school expressed very strong views that this was the right option for them. A very small number of written respondents stated a very clear dissatisfaction with provision at special schools. The Green Party stated that although they believe that it is a human right for a child to be educated in an all ability setting, the proposals do not set out the assessment criteria.

- 10.13 There was less disagreement about the other principles although often they were qualified by conditions that should be in place:
- an improved level of resourcing in mainstream
 - greater staff training
 - no reduction in the number of special school places (though it is not always clear whether respondents are referring only to places physically located in special schools or whether specialist places in resource bases are included)
 - improved staffing ratios.
- 10.14 Learners attending special schools expressed a high level of satisfaction about the services they receive. Learners from Brent Knoll and those young people with and without SEN in mainstream schools are strong advocates of attending mainstream schools. For them this means that they can be socially included, both now and in later life. They recognise parents' anxieties but wish to be "as employed and visible as everyone else". They wish their schools to be a truer cross-section of society and point out benefits, to both group of non-disabled learners and those with disabilities learning together. There is a feeling that if the process begins early enough it is possible for cultures to change.

Commentary

'Every child who can be should be educated in a mainstream school.'

- 10.15 In relation to this principle, it was clearly stated in the review that for it to be practicable there has to be confidence in the level of training, the availability of resources, and in the support mechanisms being put in place in mainstream; that the culture and organisation of mainstream schools needs to change considerably if it is to be inclusive; and that special schools will remain the right place for some children irrespective of the quality of provision made in mainstream. It is accepted that a change management programme is needed to achieve this.
- 10.16 Much of the SEN debate locally and nationally has focused on the issue of where children are taught. Lewisham's vision for its special schools is that they should meet the needs of children with more complex needs. In order to achieve this places will need to be reserved for children with complex needs and not be taken by those with lower level need. If this does not happen the most vulnerable members of our community will need to be educated outside of the borough. The proposals improve provision for children with lower level need in mainstream schools. It is now the expectation that children placed in special schools will spend some of their time in mainstream schools and if appropriate some will progress to dual or full time placement. A key element of the SEN strategy is to ensure that mainstream schools have access to sufficient specialist support to ensure that children with lower level SEN make progress against outcomes. The majority of young people thought that access to mainstream was important for them socially and helped them prepare for a role in wider society.
- 10.17 These principles have underpinned Lewisham's approach to SEN for many years. Setting high expectations for children is important and our principles reflect this. For these reasons it is not recommended to change the principles.

11. Views on the Proposals

- 11.1 The shorter of the two consultation documents asked three yes/no questions, as follows, with an opportunity to give supporting reasons for each answer.
- Do you agree that we should be improving what mainstream schools can offer children with special educational needs? This includes increasing the support given to them by special schools.
 - Do you agree that we should set up specialist resource bases in some mainstream schools?
 - Do you agree with the proposals to change some special schools to provide more places for children with autism and other complex needs?
- 11.2 The response form to the full version included substantially the same questions, but with specific opportunities to comment on one or more elements of the detail offered against each proposal. In this report each of the three proposals is discussed separately, although there is clearly some interdependence. The full version also included discussion of, and the opportunity to respond to, alternatives for the management of the Hospital Outreach and Education Service.

Outcomes of the Consultation on the Proposals

- 11.3 In each of the following sections there is a summary of the consultation responses, followed by an officer commentary.

Do you agree that we should be improving what mainstream schools can offer children with special educational needs? This includes increasing the support given to them by special schools.

Responses

- 11.4 The majority, about 75%, of those who responded in writing were positive that this should happen, but did not treat this proposal in isolation. Many were wary that improving the capacity of mainstream schools could be to the detriment of other parts of the service, especially the special schools, and emphasised that we should ensure this does not happen. Respondents commented on the current difficulties in meeting the needs of pupils with SEN in mainstream provision, notwithstanding that for many pupils this is managed well. In writing and in focus groups participants spoke of their perceptions of:
- **limited resources** available and the strain put on staff;
 - **limited training** of mainstream staff to work with pupils with special educational needs;
 - **performance criteria** for mainstream schools which may cause them to focus key activity on children who will make a significant difference to achieving those criteria and not those whose national curriculum levels are lower;
 - **managing the behaviour of** some pupils with SEN in large classes and social areas whatever the level of support.
- 11.5 There were a number of positive views expressed about the current outreach services, but a number of respondents commented that outreach services are not a substitute for special school teaching, and they were wary that a positive response to this question might have a consequent impact on the availability of special school places. Some of the staff participating linked the opportunity to improve outreach

services with the personalised approach to learning promoted by the Every Child Matters agenda. It was pointed out by the special schools particularly that there is a cost to providing outreach and that currently at times they feel inadequately financed to meet the needs.

- 11.6 A number of respondents drew attention to issues linked to poor behaviour of some pupils. They state that the management of behaviour is not adequately addressed either through the current provision or through the proposed arrangements. It was suggested that a significant percentage of children with behaviour difficulties do not have any diagnosis and that the resource allocation to manage behaviour in ordinary mainstream classes is consequently inadequate.
- 11.7 A small number of participants suggested that investing in mainstream schools was a waste of money and that it would be better spent on special schools.

Commentary

- 11.8 The intention is to maintain and improve the potential outcomes for young people currently in the school system and to enhance the attainment, participation and employability of the following generation. While there was much criticism of practice in mainstream schools the evidence of Ofsted inspections does not support the view as practice is reported to be at least satisfactory and often good in Lewisham Schools.

Resources

- 11.9 Lewisham's expenditure on SEN is above the national average. The adapted financial arrangements put in place from April 2007 have been an opportunity for schools to reconsider their budgets and will be increasingly so as delegated finance changes over the next few years. The proposals taken together envisage a realignment of finance, making savings in the long-term on placement out of the borough, some of which will be recycled into mainstream school budgets. This will increase the flexibility of schools to develop provision which addresses the needs of pupils with SEN. It is agreed that the local authority should further develop its monitoring procedures and support schools to improve their own reviews so that it is demonstrable that schools are not under-using the finance intended for pupils with SEN. It is proposed that the outcomes of monitoring will be reported regularly to Schools Forum.

Training

- 11.10 It is agreed that to take forward the ambitious agenda set out in Strengthening Specialist Provision for children with SEN, that there is a need to:
- develop staff with advanced skills in SEN
 - develop new mixed skills teams that can provide outreach support
 - build on the National Strategies that support all schools to have inclusive practice.
- 11.11 Following the strong views expressed during consultation we have reviewed our Training Strategy to strengthen our approach. In order to build up the specialist expertise across the collaboratives of schools including mainstream schools developing resource bases, we will work with higher education institutions and other providers to support the development of training and specialist qualifications for those working within the mainstream or specialist sector. Schools developing resource bases will have specialist SEN staff this will be achieved through training or recruitment. We will work with schools to identify the most helpful approach to strengthening provision. An audit tool will be provided to schools so that they can identify SEN training needs. The outcomes of audit will inform school and LA

training plans. Approaches to training could include a list of preferred providers for particular needs, subsidised training and an agreed protocol requiring specified post-holders to attend specialist training. A menu of training will include:

- * Specialist ASD training
- * Speech and communication
- * Literacy and numeracy
- * Behaviour management

Developing the strategic role of SENCOs to play a fuller part in policy development and school improvement is a priority. Learning Support Assistants and Learning Mentors have a key role in supporting children with SEN and the development of these staff will also be a priority.

- 11.12 Building on the success of the out-reach services developed from New Woodlands school we will support the development of similar services from all special schools. We will support schools to develop multi-agency teams so that they can support children across all the ECM outcomes and give advice to their families. The Workforce Strategy will support the development of these teams. The strategy will also impact upon the LA's central team and we will comply with the new generic minimum standards set for support services.
- 11.13 The National Strategies support all schools developing ambitious targets and having high expectations for children with SEN. The LA will support schools to identify what good progress is for pupils with SEN and ensure that the school target setting for SEN is personalised and ambitious.

Performance of schools

- 11.14 It is frequently stated that finding ways to improve the outcomes for pupils with SEN will lead to a school having a wider range of strategies for working with all pupils. There is evidence that supports this view. Nationally, descriptions such as "assessment for learning" and "personalised learning" are used for methods which support this, and they are promoted in the national strategy for education. Local authority staff will continue to work with schools to implement improvement in teaching and learning, with a particular focus on the effect on pupils with SEN. It is agreed that we should consider incentivising schools to want to take children with SEN, perhaps through publicising outcomes separately to show schools' performance in this area.

Managing Behaviour

- 11.15 Officers recognise that insufficient emphasis may have been put into the consultation paper on working with pupils whose behaviour disrupts normal classroom activity. This was because there has been successful development in this area in primary provision, and the opening of New Woodlands Key Stage 3 classes and the enhancement of secondary outreach provision are already in hand. There has been good evidence of the effect of the specialist teacher team and other strategies at primary level, and it is expected that there will be a significant change at secondary level from Autumn 2007. The impact of this change will be monitored. Regarding resources for such children in mainstream schools, the finance made available to schools (apart from that attached to statements) is related to a number of factors, some of which may be statistically related to behaviour. It is not directly linked to individual pupils whose behaviour may be challenging, so each school therefore allocates resources to classes as is seen fit.

Do you agree that we should set up specialist resource bases in some mainstream schools?

Responses

- 11.16 In each category of respondents to the written consultation, there was a majority response in favour of the introduction of resource bases. This included about 80% of the parents or primary children, 70% of secondary and over 80% of the staff replying. A number of participants in focus groups welcomed the opportunity for clarification of how they might work, and of how such bases run in other authorities.
- 11.17 Several key themes emerged in reasons for supporting this proposal:
- The bases will help more children with learning difficulties
 - The schools need specialist resources to teach children effectively
 - The bases will support those children with SEN already absorbed within the mainstream roll
 - The bases will provide a good transition point between mainstream and special schools and vice versa
- 11.18 However, a large number of respondents agreeing with this proposal also expressed reservations or stated conditions necessary for their implementation. The trade unions were opposed to the introduction of resource bases. Different concerns were expressed by different respondents. They included:
- **There must be sufficient resources**, including trained and skilled staff if they are to work for children
 - **The bases should be complementary** to special school places but not replace them
 - **Parental preference** – parents and professionals should have a strong voice and choice in where children are placed
 - **The number of resource** base places must be sufficient for those who need them
 - **Concerns about bullying** – and potential isolation of children in resource bases
 - **Funding** arrangements must be clear
- 11.19 Of the proposals put forward for initiating specialist resource bases there was little overall difference in the level of their acceptance between one school and another. Secondary school staff were a little more cautious in relation to what they might be expected to do when pupils from the resource base are in mainstream classrooms, but all welcomed the idea that there would be specialist staff appointed to the bases who would be able to give guidance. It was also considered beneficial that these staff might bring expertise which could be used more widely in the school.
- 11.20 A number of respondents including the NUT and Brent Knoll parents, strongly opposed to the potential loss of the primary provision at Brent Knoll, were guarded in their acceptance of primary resource bases, recognising the connection between the two proposals. The proposal to cease a primary provision at Brent Knoll school is not supported by parents at the school. Some respondents suspected that the provision of resource bases would lead to children being inappropriately taught in mainstream classes of unwilling teachers. There was concern expressed that funding would not be sufficient and the implementation would take place against the wishes of Headteachers.

Commentary

Bases should be Complementary

- 11.21 It is agreed that the bases should be complementary to special school places. In line with the Every Child Matters and the national strategy for SEN, schools are expected to work collaboratively and where possible in Federations to meet the needs of children with SEN. Strong networks of schools sharing responsibility for children in their area have enormous potential to improve the quality of teaching and learning. Mainstream and special schools working together can open up new pathways for children with SEN. For example, a child may spend some of their time in a special school and progress to a resource base in a mainstream school. The proposals break down the divide between mainstream and special schools to create a unified system where more children can be included within a wider community of schools.
- 11.22 The proposals will maintain primary special school placements at Watergate, New Woodlands and the new ASD school and an additional 80 places across five primary schools. On the basis of the evidence it is considered that this will be a sufficient and well balanced range of provision. It would provide a continuum of provision that is lacking in the current situation. It is envisaged that the new arrangements will see more children moving between schools through dual placements or transition to mainstream. Children currently placed at Brent Knoll will remain there as long as the provision is appropriate to their needs and parental wishes. As there will be new provision across the Borough more local provision can be made. The proposals aim to break down the divide between mainstream and special schools to create a unified system where more children can be included within a wider community of schools.

Parental Preference

- 11.23 The legislation on SEN and the Code of Practice ensures that parents express a preference for a maintained school they wish their child to attend. Local authorities must comply with a parental preference unless the school is unsuitable to the child's age, ability, aptitude or SEN or that the placement is incompatible with the efficient use of resources. These proposals do not change in any way parents' rights. Professionals will be asked for their views on the child's needs during the statutory assessment process.

Bullying

- 11.24 There were concerns in both mainstream and special schools about bullying. The Restorative Justice (RJ) approach is an effective means of combating bullying in schools. In Lewisham we have schools now with national and international reputations for RJ practice and their expertise will be used to support other schools. Additional resources have been allocated to RJ in the 2007-08 financial year.

Funding

- 11.25 Financial resourcing of the resource bases will treat them as special schools, so that they will receive funding based on the number of places being made available rather than the number of places occupied. This system ensures that the school has a stability of resources to plan appropriately and make provision for the needs of their children. The level of resource will enable schools to ensure the safety of children and to make the appropriate support is available to encourage access to all aspects of the wider school curriculum. The allocation of resources for the bases will be clearly identified within the schools' budgets. We will specify the requirements which they are funding and will monitor against those.

Specific Proposals

Primary Resource Bases at John Ball, Tidemill, Perrymount and Forster Park

11.26 There was a general view that primary school resource bases would be successful. The four schools wishing to develop resource bases were positive and saw this initiative within the strategic development of their schools. Parents and professionals were particularly positive about Perrymount which already has children with very complex needs. Several respondents thought that all schools should have a resource base. The proposed phasing out of Brent Knoll affected the views of many respondents. Two thirds of staff who raised concerns were from two schools, Myatt Gardens and Lucas Vale. There was a general level of enthusiasm amongst parents of younger children about the opportunity for their child to be supported in a mainstream environment.

Secondary Resource Bases – Catford High, Addey & Stanhope

11.27 There has been a small specialist resource at Catford High for one year. The school is positive about the development. They are keen that they are involved in the decision making about children being placed at the provision.

11.28 Addey & Stanhope are very supportive and enthusiastic about the development of a resource base. There were some concerns that it would not be physically possible to locate a base at the school. The school has reviewed its accommodation requirements so that the base can be included. They are about to appoint a speech and language therapist.

Commentary

11.29 Work will continue to support the schools in developing this provision. The schools have already been working together to plan training and they have researched best practice nationally.

Do you agree with the proposals to change some special schools to provide more places for children with autism and other complex needs?

Responses

11.30 A significantly higher proportion of stakeholders are in favour of these proposals than those who are not. About 3 in 4 respondents to the written responses are in favour of making the proposed changes, focused especially on the opening of a specialist school for children and young people with autism. In general these have been from people with no direct stake in Brent Knoll or Pendragon. There is a widely agreed recognition that further provision is needed for children with ASD.

11.31 Responses to these proposals have shown a high level of concern about any changes from stakeholders directly involved with Pendragon (parents, staff, students and governors), and also from parents with children at Brent Knoll. Other stakeholders linked to Brent Knoll have voiced concerns but students especially have considered positively some of the proposed change. Staff, governors and parents currently linked to Meadowgate have been divided in their responses. The key issues arising from the consultation are:

- Management of change, particularly the proposed new school and closure of Meadowgate and Pendragon schools: “Why change schools that are performing well?” and there was a view “Why fix something that is not broken?” During the consultation period new draft guidance was published

by DCSF introducing the concept of a fair test for the re-organisation of special schools. Respondents were keen to know how the proposals matched this test.

- The PCT and CAHMS were concerned to continue to work with us recognising that children with complex needs and ASD are very different group and need to be considered separately within the proposals.
- Finding a suitable site for the proposed new school and the ability to maintain a separation of primary and secondary sections. There was concern that the Pendragon site would be too small for a 120 place school and that there would be insufficient outdoor play space.

Commentary

Management of Change

- 11.32 These proposals are based upon an analysis of need and future projections for special needs places. It is not because there is any concern about the quality of provision and standards within our special schools. There have been concerns that too many children with lower level needs are placed in special schools with the consequent effect that children with more complex needs are placed outside of the Borough and it is agreed that the special schools provide good quality services and standards are high. (The current arrangements do not sufficiently meet the needs of all Lewisham children). There is an increasing need and demand for ASD places.
- 11.33 Several respondents suggested that the current provision should be maintained and an additional special school for children with ASD be provided. This model would require the Local Authority to continue to place children with lower level need in special schools. An additional special school will increase expenditure on SEN which is already high: under these circumstances it would be very difficult to ensure value for money. It would also increase the number of children in special schools when Lewisham consistently has a higher percentage of children placed in maintained special schools compared to the national average. In 2005 England had 1.19% of the 5-15 population in special schools compared to 1.72% in Lewisham. It is accepted, however, that change for children and parents currently at those schools is difficult and re-affirms the commitment to an incremental change progress. This will ensure that children will remain at their current school if it is their parents' preference and it meets their needs.
- 11.34 The SEN strategy requires a complex programme of projects to be delivered on time and within budget. Additional programme management costs have been factored into the cost plan. The council's systems for programme management will support implementation of the strategy.

SEN Improvement Test

- 11.35 Several respondents cited the draft guidance published by DCSF attributed to Lord Adonis in the consultation and the need to adhere to its principles. The draft guidance introduces the concept of the Statutory SEN Improvement Test. The test is that when proposing the re-organisation of SEN provision the LA needs to demonstrate to parents, the local community and decision makers that the proposed alternative arrangements are likely to lead to improvements in the standard, quality and range of SEN provision. The draft proposals sets out the following key factors to be taken into account:

- Identify the details of the specific benefits that will flow from the proposals in terms of:
 - Improved access to education and associated services including the curriculum, facilities and equipment, with reference to the LA's Accessibility Strategy
 - Improved access to specialist staff, both education and other professionals, including any external support and outreach services
 - Improved access to suitable accommodation
 - Improved supply of suitable places
- Arrangements for the alternative provision for displaced pupils if a school is to be closed.
- Transport arrangements that support access and the LA's policy for SEN and disabled children
- Specification of the funding of the proposals and the planned staffing arrangements that will be put into place.

- 11.36 Although the guidance is draft and was published after Lewisham began its review of SEN the LA's proposals do meet the new SEN Test. The proposals provide improved supply of places particularly for children with ASD. The report of 10th January identified the high number of children with statements (390) who are currently placed in schools out of the borough with 90 of those children in non-maintained special schools or independent schools. It is not in the best interests of children that so many are placed outside their home communities. These proposals will ensure that more children are educated in Lewisham. The development of a continuum of provision will ensure greater flexibility of provision that can better meet children's changing needs. BSF funding will provide better physical environments that can transform children's learning. The proposals include outreach services from all the special schools and specialist resources, increased access to therapy and respite services. The proposals meet the requirements for better access to education, supply of places and other services.
- 11.37 The proposals will not result in the displacement of children. Although technically both Pendragon and Meadowgate will close in order to form the proposed new ASD school, children will not be displaced. Similarly the re-designation of Brent Knoll to be a 11-19 school will not result in displacing children. We are proposing an incremental approach that will mean children can stay in their current placement as long as it is meeting their needs and their parents wish them to stay there.
- 11.38 The LA's transport policy will be applied to the new proposals which should result in more children having their needs met closer to home. Every child attending a special school or a special resource base/unit will have their transport needs assessed and provision of transport will be dependent upon this.
- 11.39 The proposals are costed and include additional outreach, therapy and respite services. The staffing of special schools and the special resource bases will continue to be linked to national guidance contained in Circular 11/90.

Outreach Service for Children with ASD

- 11.40 There was a general view that the current service supporting ASD children in schools is inadequate with some concerns about quality. It is accepted that the current service needs to be expanded and improved. This needs to be done quite

urgently and in advance of full implementation of proposals. The development of the new service will need to involve other partners particularly Health. The partnership will specify the requirements of the new service based on an analysis of need and views of stakeholders and will be commissioned jointly.

Placement of Children with Emotional Needs

- 11.41 In response to concerns about children with emotional needs being placed with children with ASD we confirm that New Woodlands school will continue to provide for children with challenging behaviour. It is proposed that children who have emotional needs arising from trauma or mental health needs would be placed at Brent Knoll. This builds upon the work already undertaken by the school in meeting the needs of this group.

Specific Proposals to change Brent Knoll School

Response

- 11.42 A large number of responses expressed praise for Brent Knoll school. Parents were particularly keen to see how a resource base would be an improvement above the special provision made at the school. The proposal to phase out the primary provision was opposed by parents of the school. Respondents were anxious about the proposed rate of change and would prefer that resource bases are successfully established before phasing out the primary provision. The staff of the school had anxieties about job security. There were very few responses to the proposal to make 16-19 provision at the school but those who did respond were in favour.

Commentary

- 11.43 Having considered the concerns expressed carefully it remains officers' recommendation that primary specialist provision at Brent Knoll should be phased out and replaced with specialist resource bases in mainstream school. Respondents asked why we could not have specialist resource bases and primary places at the school. We have looked again at projected need and with primary places at Watergate, the proposed new ASD school and New Woodlands, it is officers' advice that there is insufficient projected need for further places for children with complex needs, such that would require a special school place. There is a need for children with less complex need which can be catered for in specialist resource bases. The proposals will not result in the displacement of children. If the proposals are agreed staff and their professional associations will be consulted fully and the Local Authority will take the appropriate steps to ensure that the risks of redundancies are minimised. The proposals overall create an additional 27 primary specialist places and 58 secondary specialist places. Staff in all the schools involved will be given access to appropriate training and appropriate action will be taken to retain the services of skilled staff within Lewisham.

Specific Proposals for a New ASD School

Response

- 11.44 Whilst there is a general consensus that a new special school for children with ASD is required there is less agreement about how to achieve this. The proposal to form the new school through the closure of Meadowgate and Pendragon receives very mixed views. Amongst those in favour of the proposal are a number of parents with

children at Meadowgate. This proposal is generally opposed by students, staff and parents at Pendragon. Health professionals and some mainstream schools expressed their support of the proposed all-through school. Children at Meadowgate expressed a desire to have their secondary school closer to them. There is a strong sense amongst learners at both Pendragon and Meadowgate that the services that they currently receive are those that they both want and need. Concerns about the suitability of the existing Pendragon site became a recurrent topic in the consultation with staff and parents.

Commentary

- 11.45 The need for a new ASD school is generally accepted. In developing our proposals we have considered carefully the need to build upon good practice, ensure continuity in children's learning and the physical environment. Meadowgate already provides very specialist provision for children with complex needs including autism. Pendragon is just beginning to adapt its provision to match its feeder primary school. There have been problems in ensuring effective transition for children with complex ASD but collaborative working has been developing. The accommodation at both schools is no longer fit for the changing population of pupils. One school providing for children 5-19 will enable greater continuity across all key stages and minimise the effects of transition. Funding is available through BSF for an all-age special school. The options for the location of the proposed new ASD school are considered later in the report.

Watergate & Greenvale

- 11.46 Very few comments were made on the proposed development of a federation between Greenvale and Watergate schools. Governors have agreed a "soft" federation of these two schools, which demonstrates commitment to a close working partnership, but maintains two separate governing bodies. The Executive Headteacher for the federation has been appointed, to further the joint working and to develop the key role of the schools in Lewisham's strategy for SEN. Although no specific reference was made to these schools in the consultation report it is recognised that in both schools a substantial number of pupils have autistic spectrum disorder alongside their cognitive difficulties.

Hospital Education and Outreach Service

- 11.47 Comparatively few respondents expressed a view on the proposal for management of this service. Almost all those who did have some direct involvement as professionals, from either health or education services, and the one learner who provided a written response to the consultation was part of this service. The Management Board of Abbey Manor College were strongly in favour of incorporating this service with theirs, seeing a coherence in the type of provision which the two services make. This group suggests that creating a shared governance, and therefore financial structure, will enable the vocational offer already embedded at Abbey Manor and John Evelyn to be extended to the learners of the Hospital Service. Other respondents prefer the option of the Hospital provision (HEOS) working as an independent service, highlighting the GCSE route as one which is most suitable for many of their students. They consider the discordance between the mental health needs of a significant number of learners in the HEOS, which leads them to be cautious about their involvement with other young people, and the challenging behaviour of learners at Abbey Manor.

Commentary

- 11.48 Lewisham's approach is to promote collaboration between schools including hard and soft federations. This approach enables resources to be used efficiently so that they better support outcomes for children. The establishment of a stand alone small unit would be inconsistent with this approach and would require additional funding for the management arrangements. There are benefits both in terms of service quality and best use of resources in having a shared governance and management arrangement with Abbey Manor College.
- 11.49 It is not proposed that the HEOS should be located on one of the existing Abbey Manor College sites, therefore, the risks of the two pupil population's needs being compromised are not significant.

Responses from the Trade Unions

- 11.50 The Trade Unions that responded to the consultation including the NUT, ATL and Unison were opposed to the proposals. The NUT state that they support the principle of Inclusion but oppose these proposals because there were insufficient financial details and the need for more resources was paramount. Staff would need access to training and expert support. They cite the research of Cambridge University "Costs of Inclusion". All unions expressed concerns about the impact on staff and the need for training. A common issue was that the proposals lacked detail on arrangements to support children with Behavioural and Emotional Needs. At the request of some of the Trade Unions a separate focus group was set up and representatives took some time to explore the wider implications of the proposals and suggested conditions that would be needed to implement the proposals

Commentary

- 11.51 It is accepted that the proposals are dependent upon a cost plan that supports increased levels of specialist teaching and non-teaching staff and access to appropriate training. Lewisham's funding for SEN is high. The proposals will enable the re-alignment of budgets to meet the costs of improved local services and the management of change programme. The detailed proposals on Behaviour Support were not included in the report as plans to increase provision at New Woodlands were well in hand. The KS3 provision which includes a comprehensive secondary outreach service opened in September 2007.

12. Resulting Proposals to Improve Provision for Children with SEN

- 12.1 The following measures are recommended in order to increase the capacity of mainstream schools to meet children's SEN:
- a management of change programme that includes a training programme for teaching and non-teaching staff in mainstream schools
 - the development of specialist resource bases in mainstream primary and secondary schools include services for providing advice and support to other schools
 - that the special schools each offer outreach services developing their role in providing advice, training and support to mainstream schools and other services
 - that the special schools support children moving from special to mainstream where that is appropriate to their needs
 - that the LA expands its monitoring role for children with SEN and the use of resources delegated to support them, and that there will be regular reports to Schools Forum.

- 12.2 In response to concerns expressed by stakeholders the following areas are ones where changes might be considered to strengthen further our original proposals.

Issue	Response
Number of specialist places	It would be possible to increase specialist places further and the consultation responses indicate this would be welcomed. Holbeach primary school and Bonus Pastor secondary have been identified as possible locations.
Training	We have reviewed and strengthened the Training Strategy. Further consultation will be carried out with schools to ensure that the measures we propose are robust.
Support and advocacy for parents	It would be possible to increase the role of the Parent Partnership service so that the concerns identified in the consultation can be addressed.
Outreach services	We propose to bring forward the start date for the ASD Outreach team
Monitoring and reporting	The authority's systems for monitoring statements will be made stronger and more accountable
Phasing out of primary provision at Brent Knoll.	To consider delaying this until sufficient places are available in the primary resource bases.
Appropriateness of school site	Other site options have been explored

Issue 1: Increasing Specialist Places.

- 12.3 The proposals in the 10th January 2007 report set out proposals for establishing new resource bases as follows:

- John Ball Primary School – 16 places for ASD
- Perrymount – 16 places for Complex medical and physical needs
- Tidemill – 16 places SLCN
- Forster Park – 16 places SLCN
- Addey and Stanhope – 25 places for SLCN
- Catford High – 35 places for LDD
- New Secondary School – 20 places LDD

- 12.4 In order to offer increased flexibility in response to the concerns that there may be insufficient specialist places available, the Mayor is asked to consider the development of additional resource bases as follows:

- Holbeach – 16 places ASD
- Bonus Pastor – 25 places SLCN

- 12.5 Appendix 5 shows how in each phase the overall requirement for additional places for pupils with high level needs will be met.

Issue 2: Training

- 12.6 As set out earlier access to training was identified by many stakeholders as key to implementing the proposals. In response the SEN Training Plan has been reviewed and strengthened.

Issue 3: Support and Advocacy for Parents

- 12.7 In recognition of the expressed concerns about the difficulty for parents in dealing with the bureaucratic SEN process, it is proposed that the Parent Partnership service should be expanded.

Issue 4: Outreach Services for Children with ASD

- 12.8 The consultation highlighted the urgent need to improve services for children with ASD. In the long term it is proposed that this will be delivered through the special schools, with the lead taken in due course by the new ASD school. It is proposed that a new ASD Outreach service is developed in advance of the opening of the new school and that the LA works with the PCT in assessing the scope for jointly commissioning this.

Issue 5: Monitoring and Reporting

- 12.9 The LA has systems for monitoring the quality of provision and progress of children with special educational needs. However, the consultation responses implied limited knowledge of these and suggested the need for a more public approach. There was some concern whether delegated and devolved funds would be used efficiently and solely to support the pupils for whom they are intended. It is agreed that accountability systems do need to be strengthened. This will be done and it is proposed that regular reports are provided to the Schools Forum and the Children and Young People's Strategic Board.

Issue 6: Primary places at Brent Knoll

- 12.10 In response to concerns raised during the consultation The Mayor to consider whether primary provision at Brent Knoll should be phased out when sufficient places are available in primary resource bases

Issue 7: Accommodation Issues for Special School Provision

- 12.11 The SEN Strategy in January 2007 proposed :
- The development of a single special school for children with ASD 4-19 years old. The proposal was for a school with 120 places;
 - Adaptations to Brent Knoll because of the requirement to take secondary children with more complex needs, and a reduction in places from 132 to 84.

12.12 The key drivers for the development of design options for Brent Knoll and new ASD school were:

- The provision of transformational facilities which will meet the educational and social needs of the pupils who will attend.
- The development of options to address any suitability, sufficiency and condition problems which exist in the current buildings.
- A desire for facilities which comply with best practice in building design and embrace the more generous space and specification standards of BB77 including sufficient outdoor play space.
- Centres of excellence for SEN teaching that embody at least the following characteristics: good internal and external aesthetics; flexible and adaptable accommodation; design appropriate for different types of SEN pupil, especially in respect to access and mobility; circulation that is clear and appropriate
- Sustainable developments that respond to current climate change concerns
- Minimising disruption for pupils during any rebuilding or remedial work.

12.13 In developing these options it was recognised that there were a number of constraints, principally:

- The available budget as at January 2007, based upon funding from the BSF programme;
- Potentially appropriate sites for development are restricted in the borough. Sites identified for exploration included the existing Brent Knoll, Pendragon, Meadowgate and Leahurst Road sites (the latter being the current decant site for Northbrook Secondary School).

12.14 The budget is insufficient to build two new schools at current prices and under current building regulations and requirements. The priority has been to ensure that new ASD places are established locally, in settings which appropriately reflect pupils' needs.

12.15 Taking all the factors into account, the Mayor is asked to consider the recommendation that the new ASD school should be established on the Pendragon site, and that Brent Knoll should be relocated to the Leahurst Road site.

12.16 Full details of the consideration of sites appear in Appendix 4.

13. Financial Implications

Revenue Implications

13.1 The paragraphs below quantify and give a brief description of the cost implications of the action proposed in the report. At the end of this section there is a table summarising the implications, showing that the proposed action will be self financing once fully implemented.

- There is a reduction in the places at Brent Knoll school to 84 with a change from mixed SEN provision to complex and enduring needs. The current formula funding is £12k per place. The resources for the new provision are

estimated to be funded at £16k per place. This would provide a net reduction in formula funding of £204k.

- The new Pendragon/Meadowgate school will provide 120 places rather than the 204 currently. The current provision at the schools is funded at £12,800 per place. The new provision is estimated to be funded at £16,900. This produces a net reduction in formula funding of £256k.
- The 80 additional primary resourced unit places supporting ASD and LDD places will require an additional formula funding of £1,120k. This assumes an average per place funding of £14k.
- The 105 additional secondary resourced unit places for LDD and SLCN places will require additional formula funding of £1,365k. This assumes an average per place funding of £13k.
- The review assumes an increase in 16-19 places of 33 which will attract £52k additional funding from the Learning & Skills Council (LSC) based upon the 07-08 rate of £1,583 per place.
- The change in the local provision in special schools, mainstream resource bases and mainstream schools will enhance the capacity to support children with SEN locally and reduce the dependency upon out of borough placements. An examination of the cohorts of pupils in the principal SEN need groups indicates that up to 20 pupils per annum would in future be accommodated in the local provision that currently would be placed out of borough. Over a five year period up to 85 pupils from a total of 327 currently out of borough would be supported locally. There would not be a 'bringing back' of pupils already placed out of borough but would be a reduction of such placements over time. This would lead to a reduction in expenditure of £2.5m which has been costed at the average out of borough placement cost of £29k. This would be used to finance the enhanced local provision. It should be noted that many placements cost over £45k per annum and so the estimate of cost saving is prudent assuming that the change in numbers is realised.
- Additional costs of enhancing therapy and respite care will be minimised by combining the resources of the Authority and the Primary Care Trust and commissioning the enhanced services. It is, however, estimated that there will be a cost of £125k over and above the current level of resources. Currently through increased SEN delegation school collaboratives are spending over £225k on speech and language therapy.
- The enhanced local provision and subsequent increase in pupil numbers will attract additional funding through the Dedicated Schools Grant (DSG). Over a five year period a reduction of 85 pupils placed out borough is expected. If this is fully realised then additional resources of £454k could be attained.
- The review assumes that outreach work will be essential to ensure that the new pattern provision realises its potential to enhance local capacity to support children with SEN. At this stage it is estimated this would require an equivalent resource to 6 additional full time staff with on costs and training amounting to £450k. The resource would be based in the Special Schools/Specialist Resource bases.

<u>Summary of financial implications</u>	Reduced costs (full year effect) £k	Proposed costs (full year effect) £k
Primary resource bases		1,120
Secondary resource bases		1,365
Outreach service and training		450
Therapy and health needs		325
Respite Care		125
Increase in Parent Partnership support		35
Total additional expenditure		+3,420
Out of borough placements	2,455	
Brent Knoll	204	
Pendragon	256	
Total expenditure reductions		- 2,915
Additional LSC funding	52	
Additional DSG funding	453	
Total increase in grant		- 505
Net cost on full implementation		0

13.2 It can be seen from the table above that, based on current costings, the action proposed in this report is self financing, once fully implemented. In the short term there will be an additional cost of managing change of £76k per annum for three years. This cost will be contained within existing budgets.

Capital Implications

13.3 Financial implications for the capital programme are commercially sensitive and are therefore not included in this report.

14. Legal Implications

14.1 The Human Rights Act 1998 safeguards the rights of children in the borough to educational provision which the local authority is empowered to provide in compliance with its duties under domestic legislation.

14.2 Section 14 of the Education Act 1996 places a general duty on local authorities to secure that there are sufficient schools for providing primary and secondary school education and requires them in particular to have regard to the need to secure that special educational provision is made for pupils with special educational needs. Section 315 of the Education Act 1996 requires local authorities to keep their arrangements for special educational needs provision under review.

14.3 Section 9 of the Education Act 1996 places a general duty on local authorities and funding authorities to have regard to the general principle that children are educated in accordance with their parents' wishes, so far as that is compatible with the provision of efficient education and training and the avoidance of unreasonable public expenditure.

- 14.4 The Education and Inspections Act 2006 gives local authorities the responsibility for determining school reorganisation proposals in the first instance. The Act provides that where there is concern about a local authority's decision the governing bodies and trustees of foundation special schools, and local strategic education partners (those previously represented on the School Organisation Committee), will be able to refer the proposals to the independent Schools Adjudicator who will consider them afresh.
- 14.5 The Education and Inspections Act 2006 requires local authorities to consider and respond to parental representations when carrying out their planning duty to make sure that there is sufficient primary and secondary provision and suitable SEN provision in their area.
- 14.6 Many children with special educational needs will also be disabled, and some disabled children, though they may not have special educational needs, may have particular access requirements. Local authorities are under a statutory duty under the Disability Discrimination Act 1995 to increase the accessibility of schools for disabled pupils and to prepare accessibility strategies showing how they plan to:
- Improve the physical school environment
 - Increase the extent to which disabled pupils can participate in the school curriculum
 - Improve the delivery to disabled pupils of information normally provided to non-disabled pupils in writing in different formats
- 14.7 The Disability Discrimination Act 1995 requires local authorities and schools to have regard to the need to eliminate discrimination and promote equality of opportunity for disabled people (children, staff and members of the public using their services) and produce disability equality schemes showing how they will do this.
- 14.8 The local authority in conducting its review of special educational needs is required to conduct a disability equality impact assessment. Reference to such assessment appear at paragraph 15. In arriving at decisions in this regard the local authority is required to demonstrate that:
- a) the decision is based on objective criteria (justification);
 - b) the decision is a reasonable means of achieving a legitimate aim (justification) - this is relevant in the event that the decision is found to be a failure to make reasonable adjustments;
 - c) the views of disabled people have been taken into consideration and their participation and engagement have been encouraged (mere consultation is not enough);
 - d) once it has been established that the decision will significantly impact on disabled people, steps have been taken to minimise the impact. Such steps may include better partnering with the health and the voluntary sector, reallocating grants between directorates, publicity and information about the availability of alternatives (such as the availability of voluntary sector grants or external funding) etc.
- 14.9 Departmental guidance requires that when proposals are developed for reorganising or altering special educational needs provision local authorities and/or other proposers will need to show how they will improve standards, quality and/or range

of educational provision for children with special educational needs. Such factors are addressed at paragraphs 11.35 – 11.39 of the report.

- 14.10 When planning any changes to SEN provision, including closing special schools, opening new special schools, or adding, changing or removing SEN provision in mainstream or special schools, the local authority should consider whether statutory proposals are required. Where proposals are required proposers will need to follow the statutory process for new schools, school closures and for changes to SEN provision in mainstream schools as set out in the Decision Makers Guidance.
- 14.11 Current legislative provision for the establishment, discontinuance or alteration of schools is contained in sections 7, 15 and 18 of and Schedule 2 to the Education and Inspections Act 2006. Those sections stipulate that proposers shall before publishing statutory proposals consult such persons as seem appropriate, having regard to any guidance issued by the Secretary of State.
- 14.12 Should the Mayor decide to pursue any of the proposals with regard to the establishment, discontinuance or prescribed alteration of any school as set out in this report, statutory notices will need to be issued in accordance with detailed procedure laid down in Schedule 2 to the Education and Inspections Act 2006 and supplemented by the School Organisation (Establishment and Discontinuance of Schools) (England) Regulations 2007 and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007.
- 14.13 Once statutory proposals are published there follows a 6 week statutory period during which representations can be made. Such representations must be sent to the local authority. Section 21 of the Education and Inspections Act 2006 provides for regulations to set out who should decide proposals for any prescribed alterations. The School Organisation (Prescribed Alterations to Maintained Schools)(England) Regulations 2007 make detailed provision for the consideration of prescribed alteration proposals. Most decisions will be taken by the local authority with some rights of appeal to the schools adjudicator.
- 14.14 If the local authority fails to decide proposals within 2 months of the end of the representation period the local authority must forward proposals, and any received representations (i.e. not withdrawn in writing), to the schools adjudicator for decision within one week of the end of the 2 month period.
- 14.15 In relation to school closure proposals most decisions will be taken by the local authority; however there is some right of appeal to the schools adjudicator. Where there are objections to the proposals, or there are no objections but the proposals are “related” to other proposals, the proposals will be decided as set out above.
- 14.16 In progressing proposals for the establishment of a new special school the local authority is ordinarily required to comply with the competition requirements prescribed in section 7 of the Education and Inspection Act 2006. The competition process does enable the local authority to publish proposals of its own for the establishment of a foundation special school or, where the local authority has a current APA rating of 4 on the day that the competition notice is published, publish proposals for a community special school without the consent of the Secretary of State. Alternatively a local authority may publish proposals for the establishment of a community special school with the consent of the Secretary of State, if on the day that the competition notice is published the authority has either a current APA rating of 3 or 2.
- 14.17 Decisions on school competition proposals are decided by the local authority except where the local authority is the proposer of a school or where there are proposals for a new foundation school where the local authority are a member of the foundation,

appoint a member of the foundation or a charity trustee or where the local authority exercises voting rights in the foundation or appoints anyone who can exercise voting rights. There is no right of appeal against a local authority's decision on school competition proposals.

- 14.18 In deciding whether to agree the recommendations, the Mayor must be satisfied that to do so is a reasonable exercise of his discretion on a consideration of all relevant matters and disregarding irrelevancies.

15. Equalities Implications

- 15.1 The proposals seek to improve access to specialist provision for vulnerable groups, including secondary aged children with autism and with behaviour difficulties who currently have less access to appropriate local educational provision. Provision for secondary aged pupils with behaviour difficulties will be extended from September 2007.
- 15.2 The proposals seek also to increase opportunities for pupils with SEN to access mainstream provision. Nearly half of all pupils with a statement are in special schools. Only 3% are placed in resource bases or resourced provision in mainstream schools. Recent research indicates greater progress can be made by pupils with SEN if they have access to specialist teaching in a resourced unit in mainstream provision.
- 15.3 The proposals support the achievement of the LA's goals as set out in its Access Plan. They significantly improve access to the curriculum for children with disabilities. The refurbishment and rebuilding of schools support physical access to the curriculum.
- 15.4 In common with all aspects of education in Lewisham, close equalities monitoring is undertaken in relation to children with SEN. As proposals are developed following consultation, further equalities impact assessments will be carried out.

16. Crime and Disorder Implications

- 16.1 There are no direct crime and disorder implications arising out of this report.

17. Environmental Implications

- 17.1 These proposals will enable provision to be made more locally for children with SEN. This would reduce the requirement for so many children to be transported to schools outside of their locality including placement outside of the Borough.
- 17.2 The proposal for a new special school and new resource bases in mainstream will be designed to meet environmentally sustainable standards. As a minimum all new school facilities will have a Building Research Establishment Environmental Assessment Method (BREEAM) rating of "excellent". Furthermore, in line with Planning Policy Statement 22, 10% of the annual carbon emissions resulting from the operation of the school buildings will be offset with renewable sources of energy installed on site such as wind, solar hot water collectors, photovoltaic and biomass.

18. Risk Analysis

Primary Resource Bases

- 18.1 There are four primary resource bases which will require capital. The School Access initiative would provide some of the funding for these projects but not the whole. The strategy assumes a reduction, overtime, in the proportion of children placed out of borough. If this is not delivered overall costs will rise and create pressure on the Directorate's budget.

Estates Strategy

- 18.2 The strategy requires a complex programme of projects to be delivered on time and within budget. Although BSF resources have been identified each project will require detailed agreement with the BSF partner before work commences. The primary element of the programme includes projects where resources have still to be confirmed. All work is currently priced at 2007 prices; costs of inflation will require additional funding in due course.

Health Services

- 18.3 These proposals are dependent upon health professional e.g. speech and language therapists being available to work across special and mainstream schools. The proposals will require an increase in the health workforce and the Local Authority will need to consider how these services will be provided. There is an agreement with the PCT to the joint commissioning of the new services. Recruitment to these specialist posts are a potential risk. We will work with colleagues in health to help manage this risk by looking at innovative ways of developing the provision and a recruitment strategy.

Appendix 1 Forecast of Lewisham Resident Pupils with Statements per Age Group per Category of Need over the next 10 years

Age Group	2006/07			2007/08			2008/09			2009/10			2010/11		
	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19
Primary Need															
ASD	143	77	10	150	86	10	149	99	12	149	109	15	150	120	16
BESD	67	178	15	53	171	22	38	154	29	27	135	35	21	121	31
HI	19	28	2	21	24	2	15	28	3	14	25	4	13	21	6
MLD	68	214	28	57	178	37	44	136	47	35	107	45	33	80	36
MSI	1	0	0	1	0	0	1	0	0	1	0	0	1	0	0
PD	30	28	5	27	35	3	26	34	3	26	34	5	27	32	6
PMLD	13	14	6	15	10	7	15	9	10	18	9	7	17	10	5
SLCN	96	95	11	76	106	10	55	117	10	45	115	12	42	96	17
SLD	87	71	27	83	75	32	77	80	37	63	90	40	63	89	42
SPLD	42	145	11	29	120	17	20	94	22	13	70	23	10	52	20
VI	12	6	2	11	9	0	11	9	0	13	8	1	10	9	2
Age Group Totals	578	856	117	523	814	140	451	760	173	404	702	187	387	630	181
Year Totals	1551			1477			1384			1293			1198		

Age Group	2011/12			2012/13			2013/14			2014/15			2015/16		
	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19
Primary Need															
ASD	148	127	19	145	139	21	144	140	24	147	139	28	149	140	27
BESD	20	100	30	19	87	28	19	73	26	20	62	25	20	57	21
HI	11	19	6	11	20	3	10	16	4	10	15	6	10	13	3
MLD	32	66	26	28	59	19	26	48	18	26	41	17	26	38	12
MSI	0	1	0	0	1	0	0	1	0	0	1	0	0	1	0
PD	28	29	7	29	25	8	28	26	7	29	25	6	30	26	5
PMLD	19	5	7	18	9	7	19	8	7	20	9	2	21	8	5
SLCN	27	88	23	21	74	24	21	54	24	22	42	19	23	40	10
SLD	60	83	51	58	81	52	59	75	56	60	61	61	61	61	58
SPLD	7	42	15	4	34	13	4	25	12	4	17	10	4	15	7
VI	8	12	2	9	9	2	9	10	2	9	12	1	9	9	2
Age Group Totals	360	572	186	342	538	177	339	476	180	347	424	175	353	408	150
Year Totals	1118			1057			995			946			911		

Appendix 2

London Borough of Lewisham

Report of Feedback and Analysis of the SEN Consultation

September 2007

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Executive Summary

This report sets out the detailed views of stakeholders expressed in response to the London Borough of Lewisham consultation on proposals for changes to provision of education for children with Special Educational Needs.

The report addresses views about the principles which underpin the proposals and the specific proposals themselves.

In addition, it provides commentary on views about the consultation process itself and some general observations about consultation and change management.

Key findings:

- a) Views were often strongly held and passionately expressed. There is real anxiety and frustration among stakeholders which influenced responses;
- b) Many stakeholders told us that they mistrusted the consultation and that they felt that ‘the deal had already been done’;
- c) Some criticised the language of consultation papers and the timings of focus group sessions;
- d) A significant number of focus group participants told us that they were encouraged by the Authority’s choice to engage consultants as third party facilitators;
- e) Similarly they saw the process of engaging them in debate to be a positive step towards their continued participation in shaping the future of services;
- f) The Authority’s principles are generally seen as positive, although their openness to interpretation drew some strong views from stakeholders;
- g) Many chose not to provide a ‘yes’ or ‘no’ answer but instead gave a series of conditions under which the principles would be acceptably implemented;
- h) Two issues dominated debate and written responses:
 - i. The first is that a significant number of stakeholders see special schools as a positive choice for many young people with SEN rather than the place to go when you can’t go to mainstream.
 - ii. The second issue was that of statementing; who gets a statement, how this is assessed and the way that this links with resource entitlement were all subjects of discussion;
- i) There is no clear consensus on the proposals for the re-organisation of special education. There is as much support for many of the proposals as there is opposition, though there are many more written respondents in favour of the various proposals than there were focus group participants;

Respondents and participants alike frequently articulate the conditions under which the proposals could be successfully implemented and there is a degree of scepticism about whether adequate resources are available. Because of this, the quantitative data should be read in isolation.

1. Introduction

Place Group Consultants were commissioned by London Borough of Lewisham to assist the Authority in its consultation with key stakeholders; schools, school staff, parents, learners and professionals.

The output from this consultation would then be used by the Borough to help guide the development of proposals for the reorganisation of the provision of services for children and young people with Disabilities and Special Educational Needs.

Our consultants' brief was to support the Authority's team by engaging a wide range of key stakeholders in active dialogue about the proposed changes and also through the analysis of responses to a more conventional process of written responses.

This report sets out the context of the consultation, details the feedback that has been received - through both written submissions and face-to-face engagements - and provides a commentary on the responses canvassed.

1.1 Background

London Borough of Lewisham has for some time needed to confront a significant shortfall in appropriate school places - in its own special schools - for children with particular impairments. This has led to some of those children having to learn in schools outside the Borough.

As the numbers of children with a diagnosis of autism, complex learning and communication needs continues to rise, the Authority has been compelled to review its arrangements for the provision of special education and to propose new solutions which better meet the needs of all the Authority's children.

Place Group was commissioned primarily to support the Authority in reviewing their proposals for improvement of their Special Educational Needs services with stakeholders across the Borough but also to analyse the written responses to the consultation that were received by the Authority.

2. Our Approach

2.1 Place's role was to impartially facilitate the process of engagement with stakeholders.

It was the Authority's express desire that we facilitate dialogue with stakeholders who use, deliver, contribute to or are associated with the current services and who as a consequence have 'expert' insight into the implications of implementing the proposals.

We have attempted to remain impartial and objective in writing this report and have desisted from making recommendations.

Nevertheless, we believe that the report is rich in data which we trust the Authority will find valuable in taking its next steps towards meeting the needs of children with SEN.

2.2 Nearly thirty focus groups were organised drawing together stakeholders in groups representing users of particular services. By nature, a focus group is relatively small and designed to enable participants to each have a say and to debate issues with each other in a facilitated forum. As a consequence focus groups were arranged on an 'invitation only' basis in order to try to develop a balanced view of the issues by calling on a range of opinions. The stakeholders engaged in focus groups broadly comprised:

- a) Learners from each of the special schools mentioned in the proposals
- b) Learners with and without impairments attending mainstream schools
- c) Lewisham learners at special schools outside the Borough
- d) Staff from each of the special schools affected
- e) Staff from mainstream schools with potential specialist resource bases
- f) Professionals, including teaching staff
- g) Parents using particular services provided for children and young people with special educational needs

2.3 Invitations to parents were intentionally sent to those known to have strong views about some of the issues contained within the proposals as well to those whose views were not previously known so that each group would have the best balance of views possible.

2.4 In addition, two much larger events were held; one for members of the public, including past and present service users and parents who had not been able to attend a focus group and one for professionals working in Lewisham.

2.5 As impartial facilitators, our consultants' role was to create an environment in which all felt they could participate, to listen to and record views, to stimulate a deeper debate by exploring specific issues and to challenge contributions to verify or establish an accurate understanding of the views expressed.

2.6 Alongside the stakeholder engagements, our team also collated and analysed written responses from all stakeholders. Stakeholders sent written responses in several ways:

- a) By responding by post to seven questions set out at the end of a full consultation paper;
- b) By responding by post to three main questions set out at the end of a short leaflet;
- c) By emailing an account set up for the purpose of the consultation, answering the main points of the consultation in their own way, or by directly answering the seven set questions;
- d) By completing an on-line survey; and
- e) By contacting officers or the Mayors office directly

The total number of written responses received was 186.

3. Summary of views and findings about the process

3.1 In order to ensure that the consultation process adopted met the needs of stakeholders, we sought feedback on the process. Overall, the process was considered acceptable; providing participants with a means for voicing their opinions which they would like to see continue. There was some underlying cynicism regarding the ultimate value of the consultation process in determining the future shape of services in the Borough.

The stakeholders' key views on the process adopted are summarised below:

- a) The appointment of impartial third party facilitators for the consultation was received positively;
- b) The process of engagement in focus groups helped to clarify stakeholders' understanding of the proposals;
- c) Stakeholders welcomed the opportunity to begin a closer dialogue directly with officers and wish to see this continue;
- d) Stakeholders frequently appeared to lack a common understanding of the proposals and the reasons for their development;
- e) In some stakeholder groups, views were so similar amongst all group members that it seems likely that considerable preparatory discussion had taken place;
- f) Some stakeholder groups, and in particular some schools wrote 'en masse' and in one case sent photocopies of the same response;
- g) Differences in response rates may mean that the views of some stakeholder groups are over or under-represented
- h) Meadowgate parents chose to devise their own response form and faxed 26 responses on the form directly to the Mayor;
- i) There is a surprisingly low response rate from parents with children at special schools;
- j) Written responses from these parents do not consistently align with the strong oppositional views expressed within focus groups;
- k) Some professionals and to a lesser extent parents chose to focus their response on those specific questions that directly affected them;
- l) Unions have generally taken a much stronger oppositional view in their written responses than they did in focus group discussions;
- m) There is generally a much higher written response rate from within the primary sector than there is from secondary sector stakeholders;
- n) There was a tangible level of anger, anxiety and frustration across all stakeholder groups about the way the proposals were presented;
- o) There were strong feelings that the 'deal was already done';
- p) Discussions about the mistrust of the process dominated the debate in several focus groups;
- q) In focus groups stakeholders often said they had no information or view about services that did not directly affect them;
- r) Criticism about the timing of consultation sessions was frequently made;
- s) Many stakeholders said they thought the wording of the consultation papers was loaded or misleading; this particularly applies to the shorter summary paper;

- t) Some stakeholders felt that the short paper was too short whilst others found the longer paper too long;
- u) Stakeholders wrote freely and comprehensively on the vast majority of written responses received but did not always directly answer the questions asked; and
- v) A very high proportion of 'yes' or 'no' answers are subsequently qualified with caveats and conditions within written responses; to consider the quantitative responses in isolation is therefore highly misleading.

A detailed breakdown of responses on the process that was adopted in the consultation has been provided in Appendix 1.

4. Summary of views about the current SEN provision

- 4.1 Within the written responses, there is a significant difference between responses from parents and those of staff, schools and other professionals. Over half the parent respondents state that the existing provision is as they would like it whereas staff, schools and other professionals consistently say that existing provision, within Lewisham, is not as they would like it.
- 4.2 There is no significant difference between the views of parents with children in special schools and those with children in mainstream schools. The common themes for improvement remain; more places, better resources and better training.
- 4.3 Focus group discussions which provided the opportunity for exploration of the issues revealed that there are specific and common aspects of provision which stakeholders would like to change or improve; the main aspects are listed below, and the same areas for improvement are also raised frequently in written responses:
- a) Greater efficiency and a more sympathetic process for statementing is needed;
 - b) There is concern that mainstream schools lack the ability to provide for the range and complexity of needs;
 - c) Greater understanding of children's needs throughout the mainstream schools is required;
 - d) There is a need for increased training and expertise within the mainstream schools (articulated by parents, staff and other professionals);
 - e) Transition arrangements between primary and secondary schools could be improved;
 - f) Outreach services are highly regarded by mainstream schools but special schools may lack the resources to support them;
 - g) There should be more and greater availability of multi-agency input and in particular health and therapist services;
 - h) There should be higher levels and greater consistency of support, information and advice for parents and families (articulated by parents);
 - i) There needs to be greater recognition of parental expertise and increased parental involvement;
 - j) There is a need for more places for children with SEN, and in particular children with Autistic Spectrum Disorder;
 - k) There should be better strategic planning and communication between professionals;
 - l) There should be more flexibility in services and a higher level of resources for children with emotional and behavioural difficulties;
 - m) There is a requirement for properly designed facilities and premises which are accessible to students with SEN;
 - n) There should be greater flexibility in the pedagogical approach and methods of assessment;
 - o) Organisational changes are needed; including changes to class sizes, policies and procedures to enable one-to-one support and create an inclusive culture to enable learners to be taught appropriately;
 - p) A review of school and staff performance criteria should be carried out to take account of a student population with an increasing number of learning disabled students;
 - q) Higher levels of funding is needed to support mainstream and special schools, and
 - r) There is an overall need for more special school places

A detailed breakdown of responses on current SEN provision has been provided in Appendix 2.

5. Summary of views about the principles

5.1 A set of principles have been established by the Authority to guide the development of proposals;

- Every child who can be should be educated in a mainstream school;
- Support, training and resources should be provided to ensure that mainstream schools are confident and able to provide children with special needs with a high quality education;
- All special schools have an outreach function, to support and help to develop what mainstream schools offer.
- Children in special schools should have some opportunity, according to their needs, to learn alongside those in mainstream schools;
- Children and young people should be educated locally wherever possible;
- There needs to be a strong partnership between the Authority and parents; this requires good services and information;
- Resources from out-borough placements should be re-directed into mainstream schools;
- Early recognition of a child's needs and early intervention are vital. We will ensure funding is available at an earlier stage, not just through a statement;
- An efficient service for statutory assessment should be maintained for those children who still need it.

5.2 Views about the principles of the proposals are summarised as follows.

- a. A higher number of parents from the primary sector than those from the secondary sector agree with the principles and overall, a total of just under half of all parent respondents agree with them;
- b. A higher proportion of staff from mainstream schools agree with the principles than those from special schools;
- c. A higher proportion of parents with children with SEN in mainstream schools agreed with the principles than those with children at special schools;
- d. There is a very high frequency of providing no 'yes' or 'no' answer but in these cases, narrative is often provided by respondents;
- e. Where focus group participants generally agreed with the principles, they also set out a number of conditions and caveats to their agreement;
- f. Two principles caused particular contention:
 - i) 'Every Child who can be should be educated in a mainstream school' and
 - ii) 'An efficient service for statutory assessment should be maintained for those children who still need it';
- g. The second of these raised debate over the need for statementing and the efficiency of the current service; an issue which did not form part of the consultation process;
- h. A large number of respondents expressed a view that it should not be an automatic assumption that mainstream school was the right place for a child;
- i. Many focus group participants related their resistance to this principle to their own child's experience of mainstream school;
- j. We observed very little optimism that the mainstream estate could ever be an appropriate environment for children with SEN;
- k. A significant number of focus group participants expressed concern about the amount of time it would take to change the mainstream culture;

- l. Stakeholders state in written responses and in focus groups that for many children a special school is the right environment rather than a place to go when you 'can't' go to mainstream;
- m. In sharp contrast, Brent Knoll Learners and learners with and without SEN at mainstream schools were unanimous in expressing a strong desire to attend a specialist base in a mainstream school;
- n. These learners articulated the conditions under which they could attend mainstream school;
- o. Some parents with children at mainstream school expressed very strong views that this was the right option for their child;
- p. Mainstream staff expressed views that there need to be considerably higher levels of resources within mainstream schools to accommodate children with SEN;
- q. Several respondents and focus group participants say that a proper assessment procedure should be in place to determine where children are placed, and
- r. A high number of participants and respondents express concerns about the level of scrutiny that will be in place to monitor the allocation and investment of resources for mainstream school.

A detailed breakdown of responses to the principles has been provided in Appendix 3.

6. Summary of views about specific proposals

Improving the provision of SEN in mainstream settings including outreach services

- a) improvements in mainstream provision should not be to the detriment of special schools – especially if the resources required to do so are prohibitive;
- b) The current organisation of mainstream schools does not support good SEN practice;
- c) Mainstream schools have major challenges if SEN provision is to be successful
 - i. Existing understanding of SEN needs is poor in the view of parents
 - ii. Staff lack the expertise to manage SEN learners
 - iii. Mainstream schools would like to have input from special schools but they, in turn, may lack the resources to help;
- d) Current provision for some categories of SEN learners are inadequate and future provision seems to fail to take the growth in numbers of children with e.g. behavioural difficulties into account;
- e) There is a belief that mainstream schools are currently failing SEN learners;
- f) Integration into mainstream schools can be hampered by the fact that learners attend special schools – they are singled out;
- g) Some learners feel that special schools are the only solution for learners like themselves;

Views about the introduction of Resource Bases

- h) The nature of resource bases is not universally understood;
- i) The majority of respondents are in favour of resource bases
 - i. Bases will help more children with learning difficulties
 - ii. The schools need specialist resources to teach children effectively
 - iii. The bases will support those children already in mainstream schools
 - iv. The bases will provide a good transition point between mainstream and special schools;
- j) There are, however, some concerns about isolation of children in resource bases and the likelihood of bullying;;
- k) There is concern that resource bases will be less successful in secondary schools than in primary and parents want evidence that they work;
- l) This was a concern that was repeated more generically – parents feel that resource bases are untried and untested.
- m) Some – including the unions - are directly opposed to the introduction of resource bases;
- n) There is a concern that staffing of resource bases is inadequately explained in the proposals;
- o) Concern over ‘who decides who goes where’ was expressed;
- p) Concern was expressed about whether families would have a choice over the right provision for their child;
- q) There is concern about the use of pilots with most parents not wishing their child to participate;
- r) There are some strong advocates for resource bases amongst stakeholders;
- s) There is concern over the availability of multi-disciplinary support within the resource bases;
- t) The PCT would like to be more closely engaged in planning at a strategic level;

Views about the proposed increase in provision for children with Autistic Spectrum Disorder and other complex needs

- u) A higher proportion of stakeholders are in favour of these proposals than are not;
- v) Respondents tended to relate the discussion to their own situation rather than the broader context;
- w) There is a consensus that more places are required for ASD and complex needs but the PCT and CAMHS stress that Complex Needs and ASD are very different groups and should not be considered together within the proposals. The proposed ASD provision may not meet the needs of adolescent pupils with severe challenging behaviours;

Views relating to the proposed formation of a new, all-through school

- x) While health professionals and some mainstream schools are in favour of an all-through school, there is no clear consensus from the Meadowgate and Pendragon schools themselves;
- y) There is a belief among a significant number of respondents that the number of places for the proposed new school is less than the combined number provided for at Meadowgate and Pendragon schools and some felt that the proposals amounted to the closure of the special schools;
- z) Concerns were raised about the suitability of the Pendragon site;
- aa) Parents generally recognise the need to reorganise provision but there is a high level of anxiety about how this will be achieved;
- bb) Staff at Meadowgate and Pendragon schools are concerned about the move to an all-through arrangement;
- cc) There is widespread concern for the safety of young learners under the proposals;

Views about Brent Knoll

- dd) There is widespread praise for the service provided by Brent Knoll;
- ee) There is concern that a resource base will not offer an improvement over current provision – contrary to Lord Adonis' statement;
- ff) Staff have anxieties about their future roles and job security;

Views about the proposals for governance arrangements for the Hospital Education Service

- gg) Many stakeholders had inadequate knowledge to express a view;
- hh) Those who were able to express a view, unanimously and strongly stated their preference for the service to be managed independently of Abbey Manor College, and
 - ii) The Hospital Outreach staff state that the service's students are not necessarily suited to a vocational offering above an academic one.

A detailed breakdown of responses to the specific proposals has been provided in Appendix 4.

7. General Observations

- 7.1 It is important to note that discussion about the provision of education for children with Special Educational Needs consistently creates very strong and polarised views, and these are reflected in the current national and well publicised debate.

The polarisation of opinion is an indicator that the impact of impairment is unique to the individual and that each persons needs are far more complex than might be assumed through the label created by diagnosis.

The organisation of provision of special education varies across the country and there is no one Authority who could be said to have provided the exemplar model which could be immediately transferred wholesale to other Authorities.

In almost all stakeholder sessions, participants were extremely concerned to discuss the flexibility of proposed arrangements and their ability to meet the wide range of children's needs which is consistent with what we believe to be the underlying cause of the pendulum swing of national public opinion.

- 7.2 It is worth noting that learner stakeholder groups were more definite and united in their views about the arrangement of provision of Special Education.

Two separate groups of stakeholders, learners from Brent Knoll and learner from mainstream schools, of whom four had impairments, were unanimous that it was very important that children with SEN should be included within the mix of a mainstream student population.

By contrast, learners from Pendragon special school were vehemently opposed to students with SEN being placed in the mainstream estate.

- 7.3 Consistent with the national struggle to actually define 'inclusion', opinions about what the term means in Lewisham vary amongst stakeholders; some associate the term with an inflexible policy of mixing students with and without special educational needs within mainstream classes as they exist within the estate at the moment.

A small number of stakeholders and notably, these were parents who have children with SEN in just such arrangements, the thought of what they fear will be an indiscriminate and ill-considered 'dumping' of children with SEN into mainstream schools is not unsurprisingly abhorrent.

- 7.4 Many stakeholders have focused their responses on their own direct and immediate experience of education services and the experiences of their peers, whether they are fellow students, parents or staff.

We would suggest that this is absolutely to be expected and understandable but is likely to have swayed responses in certain directions. It may also be an indicator of the opportunity that exists to promote the role of special schools, raising their profile and status and legitimising their contribution to the combined educational offer within the borough.

- 7.5 Without any intention of diluting or dismissing the views that have been expressed about the proposals, it is important to note that the range of hopes and fears that underpin the responses in Lewisham are consistent with those commonly expressed when faced with the prospect of major change.

Few of us are comfortable with change and it is common for stakeholders to feel angry, anxious, distressed, unsettled, disorientated and frustrated, and these feelings will manifest themselves perhaps more noticeably when the impact of the change is not yet defined in any detail.

Stakeholders need to understand what the changes mean for them and in the absence of new information, often use what they do know as a reference point, sometimes forced to interpret 'silence' or gaps in the detail in ways which are not accurate.

- 7.6 We would suggest that regardless of the very real opportunity that we believe exists to improve outcomes for children with SEN, all stakeholders are acutely aware of the associated risks inherent in an ambitious programme of change and that resistance to signing up to the proposals where this is the case are related to fears which in some cases are overwhelming.

For those who feel strongly that the mainstream estate has failed their child, or indeed where children

themselves feel that mainstream has failed them, the prospect of that experience being repeated for them or anyone else is understandably utterly unacceptable; as a consequence we believe that some stakeholders have rejected the proposals.

- 7.7 The consistent request to provide evidence or proof that the proposals will work and a far higher level of detail than is currently available throughout stakeholder engagements is significant: the majority of the stakeholders who have responded or who have attended groups are not those who envisioned the changes as ‘innovators’, and although some are ‘early adopters’, most are at the very most ‘late adopters’.

A characteristic of ‘late adopters’ and what sets them apart from ‘innovators’ is their need to understand the whole solution in detail and to apply it to their own circumstances. It is almost inevitable that anxiety and disquiet is being expressed at this time; no final decisions have been made and the detail that would allay fears is as a consequence not yet available. A coherent strategy and change programme to which all stakeholders can contribute and own will be an essential component moving forward.

- 7.8 The very fact that so many stakeholders with such diverse views have taken the time and trouble to express them is an indicator of interest, ownership and expertise, a resource that can be harnessed and built upon in whatever improvements follow this report.

Appendix 1

Detailed comment on the process adopted

1. **The engagement of independent consultants was widely welcomed.** Throughout the consultation process, there was a widespread positive response to the fact that a team of consultants was engaged to facilitate an impartial engagement process and provide stakeholders with an opportunity to actively contribute their views in open discussion. Several focus groups said that they felt that this signified the potential for a new opportunity for a re-calibrated relationship between themselves and the Authority and its officers.
2. **The opportunity for stakeholders to engage in dialogue was well received.** Several focus groups that we met had not previously fully understood some of the proposals and their implications and found the opportunity to have them explained face-to-face highly beneficial. Stakeholders at focus groups frequently commented that the opportunity for more fluid dialogue with officers was an improvement that they would welcome. It became a common theme of discussion that more sessions like these would be well received by parents and staff as source of both receiving accurate information and for contributing views. One stakeholder commented ‘you realise that we get all our information from each other?’
3. **There is some evidence that the proposals are poorly understood.** Written responses suggest that the respondents may have gleaned information about the proposals from sources other than the consultation paper itself. For example, a common view is expressed amongst a large number of stakeholders that the proposals are a ‘cost cutting’ or ‘cost saving’ exercise despite the fact that the proposals set out plans for a significant investment in training and other resources as well as new premises. Stakeholders also state that they believe that the number of places available to students with special educational needs will be reduced rather than increased, and that the proposals are, in essence, for the ‘closure’ of special schools. Whilst implementing the proposals in full would include phasing out the primary classes at Brent Knoll and quite literally closing the premises of either Meadowgate or Pendragon to bring the two together on a single site, to interpret this as ‘school closure’ is not entirely accurate as a significant number of the current places would still be available. This view also does not take account of the fact that a new post 16 provision is also proposed. The consistency of response about these issues amongst stakeholders may have developed through receiving information such as the NUT paper in circulation or from other lobby groups. Stakeholders also frequently cited an earlier cabinet paper as evidence in which they say it was made clear that the proposals would satisfy BSF objectives and would be ‘cost neutral’.
4. **Participants sometimes responded on behalf of a group rather than as individuals, suggesting a degree of pre-discussion.** There were some focus groups in which the debate was characterised by a set of very strong and shared views about the proposals and typically these were where stakeholders of the same specific provision attended the session together. In both staff and learners’ sessions at Pendragon for example, an almost unanimous perspective that the school should remain as it is was expressed. Similarly in parents’ groups which comprised several parents from Pendragon, the same view was expressed. In one case, the Pendragon parents who attended a focus group told us that because of the ‘invitation only’ approach to organising the focus groups, they were speaking on behalf of a larger group rather than simply on their own / their child’s behalf. This was impossible to verify and inappropriate to question.
5. **Differences in response rate means that some schools’ views may be over or under-represented.** There are a very high number of responses from staff from particular schools, and in particular Myatt Garden and Lucas Vale Primary schools. In both cases, the views of all the staff who have responded are almost exactly aligned. Because the representation of views from these schools is disproportionate, the quantitative analysis of responses has been affected by their views. The specific views of both schools are taken into account under each separate issue. Parents of children at Myatt Garden Primary have also sent more response forms than those with children at other mainstream schools.
6. **The designated response channels were not always adhered to.** Twenty six parents from Meadowgate faxed a copy of an identical response sheet of their own design to the Mayor stating whether or not they are in favour of the amalgamation of Pendragon and Meadowgate schools. Of these, sixteen stated that they are in favour of amalgamation and ten stated that they are not in favour of amalgamation.
7. **With the exception of Meadowgate, there has been a surprisingly low response rate from parents of children in special schools.** Other than parents from Meadowgate, there has been a surprisingly low rate of response from parents of children at special schools, given the strength of feeling expressed by

some parents of these schools expressed at focus groups. In addition to the faxed responses from Meadowgate parents, just over fifty responses were received through various channels. Those who have responded have not expressed views that are aligned to those expressed in focus groups. In fact, whilst in almost all cases, these parents qualify their answers; considerably more parents of children in special schools have responded that they are in favour of improving SEN provision in mainstream schools, introducing specialist resource bases in primary and secondary mainstream schools and with increasing provision for children with Autistic Spectrum Disorder. This does not necessarily mean that in all cases these parents are in favour of the specific proposals for each of the special schools.

8. **There are a far greater number of responses from the primary sector than the secondary sector.** This is equally true of parent, staff and school respondents.
9. **Responses from professionals tended to focus on the issues that directly involve them.** There are a number of responses from professionals who chose to send a response only to the question which relates to the future governance of the Hospital Education Outreach Service, and these stakeholders are mostly health professionals who have a direct association or involvement with the service itself.
10. **Trade Unions have all expressed opposition to the proposals.** A number of the unions have responded to the consultation, including the NUT, the ATL and Unison. These Unions all state that they are opposed to the proposals. This reflects the views consistently expressed by them in the lobbying papers and protests that they organised throughout the consultation period. Union members who attended a focus group arranged for them at their request expressed very similar views but during the focus group, representatives took time to explore some of the wider implications of the proposals and suggest the sorts of conditions under which they might be implemented.

Stakeholder feelings about the consultation / engagement process

11. **There was a tangible and extreme level of anxiety, anger and frustration amongst some stakeholders about the way the proposals have been presented and on several occasions, they raised their voices, expressing very strong views.** This was particularly apparent when we spoke to parents, learners and staff from Pendragon School and parents with children attending Brent Knoll primary school. During sessions where stakeholders from these groups contributed, the integrity of the process was questioned with considerable force, with many expressing a view that the 'deal is already done' and that the Authority's decisions about their own or the children's futures have already been made.
12. **Mistrust of the consultation process dominated several focus groups.** This reduced the time to debate the actual proposals, leaving us to conclude that considerable preparatory debate had already taken place before the those groups were held in which scrutiny of the process had been a significant topic of debate. We feel that this belief that the stakeholder engagement has masked a disingenuous process is one that has had a significant influence on the anger and frustration that was expressed in various sessions about the specific proposals themselves. The degree of cynicism expressed about the transparency of the process itself is still a factor but much less marked within written responses.

In other groups where stakeholders had not previously met each other, they expressed and displayed much less cynicism and a greater diversity of opinion. These groups were generally more mixed in the services they used and typically included parents who have children with SEN who are placed in mainstream schools as well as those who are placed in special schools.

13. **Stakeholders in focus groups were most vocal and informed about the services that they use directly.** On many occasions we were told by participants that they had no opinion at all about proposals for schools other than those with which they had direct association; some did not want to discuss them at all. This correlates with the written responses; stakeholders have frequently answered only some and sometimes only one of the questions.

Stakeholder views about the timing of proposals

14. **Although focus groups were organised at various times to accommodate stakeholder availability, there was criticism of the timings.** Some criticism has been raised about the timing of focus groups and a small number of parents have been very angry about this. It is worth noting that almost 30 meetings were facilitated over a six week period at different times of the day, specifically to accommodate stakeholders with different commitments. Where we were made aware that the proposed timing of particular meetings was inconvenient or inappropriate, a new meeting was arranged to accommodate this group.

Stakeholder views about their own involvement in developing services

- 15. There was a consistently strong desire expressed in focus groups for stakeholders to continue to participate in and contribute to the shaping of services moving forward.** In part this appears to be driven by a desire to contribute personal and professional expertise but participation is also seen as a key factor in assuring stakeholders that the right decisions are being made and providing them with an ability to evaluate developments and see progress or otherwise for themselves, allowing them perhaps some sense of control that they may not have previously felt.

Stakeholder views about the composition of the consultation documents

- 16. The distributed consultation documents were criticised on several counts.** Much criticism has been directed towards the consultation documents that were circulated and in particular, the shorter of the two with many parents and professionals asserting that there was insufficient background information in the booklet, that the questions were ‘the wrong questions’ and that their phrasing inhibited parents in particular from expressing their real views. Stakeholders have said that they believe that the questions are phrased in such a non-controversial way that as one stakeholder put it ‘it’s a bit like signing up for love and happiness’.

By contrast to those who thought the short response form was too short or superficial, one stakeholder expressed the view in a focus group that the longer of the two documents was far too long and that this was inappropriate for working parents of children with SEN who have very little spare time to read and digest this amount of text.

- 17. The majority of written responses contain a considerable amount of additional feedback.** We can confirm that the majority of response sheets contains a considerable amount of feedback and whilst it is difficult to gauge what might have happened with a different style of questions, with more questions or with even the ‘right questions’, it is important to note that the text included on most of the returned sheets frequently ignores the exact wording of the questions and discusses instead the issues more broadly as the respondent sees fit. In fact, there are several instances in which a respondent has ticked ‘yes’ or ‘no’ to a question and then goes on to qualify it with an answer that contradicts this.
- 18. Parents and other stakeholders have expressed their views regardless of the document format that they were presented with.** Sometimes the responses take the form of a two line email or a single paragraph on a printed response form, largely ignoring the formal questions themselves.

Almost all respondents qualified their ‘yes’ or ‘no’ answers with comments. It is essential to note that there are very few examples where respondents have not qualified their ‘yes’ or ‘no’ answers; more commonly these answers are conditional. For example, there is a significant number of people who have said that they agree with a specific proposal but have said they only agree with it ‘if resources are put in place’ which is frequently the case for responses to question 2 in the full paper or ‘if special school places are not affected’ an answer that is repeated in response to questions 4 and 5.

Appendix 2

Detailed comment on the current SEN provision

1. **Parents tend to relate SEN provision to their own child's situation or that of similar children.** In a large number of written responses, parents of children from both mainstream and special schools who say that the provision is as they would like it, relate this question to their own child's current situation or children like theirs. These quotes provide a snapshot:

- a) 'My child is making good progress at Coopers Lane Hearing Impaired Unit'
- b) 'My little boy is getting better since he was statemented and his special needs teacher has started to help him'
- c) 'My son attends mainstream school and although it took us a long time to get the support we needed to be in mainstream school, we feel we made the right decision for my son and the school have dealt with his needs very well'
- d) 'Mainstream has proved the correct option for my son and I would like it to remain an option for all children with SEN'
- e) 'She is able to do her school work on her own' (parent of learner at a Pendragon school)
- f) 'Currently Brent Knoll provides a small school environment with an ability to set the lessons commensurate with students' ability'
- g) 'Yes because Brent Knoll is perfect for my son and no because I know of other parents struggling to find places for children with special needs'
- h) 'As far as Watergate is concerned, it meets the present development needs of my son'

2. **Where parents felt that current provision was as they like it, they were keen to stress their satisfaction with their children's particular school.** Similar issues were also discussed at parents' focus groups and parents with children in special schools were particularly keen to emphasise their satisfaction with the particular school itself and in direct relation to this, their anxiety that places for children like their own might not be as available in the future. This is discussed later in the report. It is less frequently the case that parents who responded that the provision was not as they would like it relate the question to their own child's circumstances. The issues raised above by focus groups are also raised by individual parents in their written responses:

- a) 'Not enough places in special schools, not enough staff or places in secondary'
- b) 'Teachers have little or no knowledge of conditions like Autism and parents have to fight to get something done'
- c) 'The provision does not meet the current needs of the boroughs children. The provision should be increased not reduced; there should be more places at special schools'
- d) 'I do not think there is enough provision in Lewisham for children with SEN. Both my children have been in classes with SEN children who need more help than is being provided by well-meaning but poorly trained TAs'
- e) 'There is insufficient physiotherapy provision.....the current waiting list for physiotherapy is closed and children on the list are waiting for over a year, during which time, parents are receiving little or no support'
- f) 'Cutbacks and insufficient funding in SEN schools has meant that provision and resources have decreased which has affected our children's education'
- g) 'There are not enough places for children on the Autistic Spectrum'

3. **There is no significant difference between the views of parents with children in special schools and those with children in mainstream schools.** In that the common themes for improvement are stated as a need for more places, better resources and better training.

4. **In written responses over two thirds of schools and three quarters of individual staff members said that the current SEN provision was not as they would like it to be.** Governors and governing bodies responded similarly. The main areas that concern respondents are related to capacity within the estate to provide the right education.

5. **Respondents across all groups consistently state that there are not enough specialist places for children with special educational needs.** In particular, schools and their staff mention the need for additional places for children with Autistic Spectrum Disorder and 'severe' learning difficulties. Haberdashers' Aske's Knights Academy states that it feels there is no speech and language therapy service available to secondary age children, and All Saints and Torridon Junior also state that the SaLT services and other health services are insufficient, as do a significant number of individual staff respondents. Northbrook and Catford High both note a need for more provision for children with ASD and Northbrook also states that there is a greater need for provision for young people with emotional social and behavioural difficulties. Concern about provision for students with SEBD is expressed by Governors of Forest Hill and by a large number of individual school staff.
6. **Myatt Garden and Launcelot schools express concern about the borough's ability to provide for the range and complexity of need.** In particular, this is perceived to be a problem within the mainstream schools. In focus groups, all the schools that we spoke to also stated views that there were insufficient places for children with learning difficulties and in particular for children with ASD.
7. **A number of mainstream schools mention in their responses that they would like improved outreach services.** There is considerable praise mentioned throughout the response forms for the outreach services provided by Brent Knoll amongst mainstream primary schools.
8. **To parents, many of the schools and a large number of individual staff from both mainstream and special schools mention that they feel there is paucity of expertise within the mainstream schools.** This includes insufficient provision of training to properly support and teach children with special educational needs.
9. **Many of the schools and school staff state that early intervention and assessment should be improved.** They go on to state that they have considerable concerns about the changes to statementing for children on lower matrix levels. Staff and parents alike express their concern about the reduction of statements and a fear that this will reduce entitlement to support for some children. Another common theme that respondents link to this is the incidence of long waiting lists to receive therapist and other specialist support. This is raised by both parents and staff.
10. **Several school respondents and individual staff state that there is a need for greater flexibility of services** Including outreach services with many linking this to providing a personalised approach to support deriving from Every Child Matters; though the Every Child Matters agenda is discussed more frequently in relation to the range of placements available.
11. **Professionals would like to see closer collaboration across services.** Professionals from a range of disciplines, including school staff and health professionals, state that there needs to be a greater level of strategic planning and closer partnership between professionals.
12. **Transitional arrangements between primary and secondary schools could be improved.** A small number of professionals, including the LSC, raise a concern that post-16 provision for children with SEN in Lewisham is currently limited. The LSC also states that there are transitional arrangements for children with SEN between primary and secondary schools could be improved and made less disruptive.
13. **Travel times for children with SEN should be minimised.** Both the LSC and the Green Party state that they have concerns that travel to a special school for children with SEN frequently involves a lengthy journey across the borough.
14. **There is a need to provide particular specialist provision.** The NADCS state that they feel the provision for deaf children in the Authority is not as they would like it and in particular the Authority's provision for profoundly deaf children which they feel may not be adequately provided for solely by Sedgemoor School. The PCT and CAMHS also stated that total communication and Aural / Oral communication are two different communication approaches and that provision for the latter should be contained within the proposal. In addition, they identified the need for specialist provision for visually impaired children in the primary estate and challenged whether the mainstream estate will be able to support children who have Sickle Cell, Brittle Bone Disease, Cystic Fibrosis and children requiring rectal diazepam.
15. **Waiting times for statutory assessments (statements) are considered to be too long.** In focus groups there was considerable discussion about the length of time parents and their children have to wait for statements, regardless of where children were ultimately placed. Parents frequently expressed a view that their child's statement was the sole catalyst for them receiving the support, understanding and services they needed and provided them with an entitlement for a place at a special school for their child. In addition to the length of time

that they said the process takes, parents frequently told us that they felt that the system was overly bureaucratic and complicated and that rather than having received advice and support throughout the process, they felt they had been obstructed or ignored by officers.

16. **Parents and staff expressed concerns about the shortage of multi-agency staff and in particular health professionals.** A related issue of the availability of and access to resources also emerged in focus groups. Parents and staff teams alike expressed concerns that there is a national and local shortage of multi agency staff and in particular health professionals and as a consequence they said that they felt their children were not getting the input that they required. The PCT and CAMHS also expressed concerns that there is neither the staff nor the funding to pay for therapists and other health professionals.

Views of young people expressed in focus groups

17. **In their focus groups, learners expressed a relatively high level of satisfaction with the services that are provided to them.** Some learners passionately expressed views that they wanted no change at all. This was particularly true at Pendragon School. At Brent Knoll School however, whilst the learners told us about their satisfaction with the school and in particular the school's ability to meet their range of needs, the young people were unanimous that they find having to attend a special school detrimental to their social relationships. They each told us of incidents where they have been bullied, have lost friends or have lost the quality of their friendships by disclosing the nature of the school they attend. A small number of the Brent Knoll children told us that they did not like the distance that they have to travel to school. All agreed that 'being different' or perhaps being seen to be different was unhelpful.
18. **Children from mainstream schools want staff to develop a greater understanding of their needs and to make adjustments for them without singling them out.** They expressed strong views that although they much preferred being in a mainstream school, they wanted staff to develop an even greater understanding of their needs and to make adjustments for them without patronising them or singling them out. They said that they felt that people avoided the subject of disability, that it is an important issue and that the whole school culture would improve if it were discussed openly, perhaps even taught in PHSE.

Appendix 3

Detailed comment on the responses to the principles

1. **Opinion is divided on the principles.** A number of broad principles set the context for the proposals for improving the provision for children and young people with SEN. Just over half the parents of children in mainstream primary schools who responded agree with the principles, whereas fewer than half the parents of children in mainstream secondary schools who responded agree with them. Just fewer than half the parents with children in primary and secondary schools who responded agree with the principles.
2. **Parents are more likely to agree with the principles than mainstream school staff.** Under a quarter of the staff from mainstream schools stated that they agree with the principles and most of the special school staff did not agree with them. Over half the parents with children in primary special schools said that they agree with the principles whereas only a third of parents of children in secondary special schools agree with them.
3. **Many respondents are uncertain about their agreement with the principles or qualified their agreement in some way.** A significant number of respondents in all groups either did not tick 'yes' or 'no' or said that they were unsure. In fact, the issues raised by respondents - whether they state that they agree with the principles or not - have some common themes. Debate in focus groups very much echoes the tenor of written response. It is important to note that almost all written respondents qualified their answers with comments, whether they agreed or disagreed and there is a synergy between what written respondents say and what was said in focus group discussions.
4. **Agreement was frequently conditional on certain conditions being met.** Where respondents or focus group participants generally agree with the principles, they frequently qualify this agreement with a statement which says that they only agree under certain conditions. These conditions relate to the way that the principles should be implemented and are summarised as follows:
 - a) That there must be more resources in mainstream schools;
 - b) There must be better training for staff;
 - c) That the number of special school places should not be reduced, and
 - d) That pupil / staff ratios would need to be changed.
5. **Two principles appear particularly contentious.** Two principles appear to cause particular contention amongst those who disagree with the principle and to a lesser extent those who agree:
 - a) 'Every Child who can be should be educated in a mainstream school', and
 - b) 'An efficient service for statutory assessment should be maintained for those children who still need it'.

A large number of respondents and participants who disagree with the first of these principle express very strong views that some children can attend a mainstream school, but that this does not mean that it is the right place for them.

On the principle to educate every child who can be in a mainstream school:

6 **There is a widely held view that families should have the option to select mainstream or special school for their children.** In written responses as in focus groups, stakeholders stress the diversity of children's needs and their view that it is important for them to have the option of where their child should attend school. There are three related issues expressed by stakeholders. The first is an issue of whether the mainstream schools are appropriate for children with SEN, the second a principle of retaining parental preference and the third the definition of the children who 'can't' and the way in which children and young people will be assessed to inform placement, and how decisions are reached.

7 **There is a common perception that Placing a child in a mainstream school would be detrimental to them.** Certainly within the parents focus groups, we observed a common perception that placing a child with special educational needs in a mainstream school would be detrimental to them, though when explored through questioning and challenging, stakeholders frequently said that their views were based on the historical experiences of their child attending a mainstream school in the past. Mainstream and special school staff have also expressed concerns that their schools are not equipped with the staff, resources or class sizes to properly support children with SEN.

There appears very little optimism amongst those parents and staff who disagree with the principles that the mainstream

estate can adapt sufficiently to accommodate their child's needs or that new resource bases could ever replicate the quality of education that they say that children receive in a special school.

8 Many stakeholders from both schools' and parents' groups express the view that a child-centred approach which they relate to the Every Child Matters agenda would not automatically promote a mainstream school above a special school as the best option for every child Instead, they would prefer an arrangement that considers every case on its merit. There is a subtle but important difference between the Authority's proposal and that expressed consistently by stakeholders. Under the Authority's proposal, children would attend a mainstream school unless they 'can't'. Stakeholders express a view that some children should go not go to a mainstream school if a special school would provide them with better experiences and outcomes.

9 In sharp contrast, two groups of learners, those from Brent Knoll and those from mainstream schools, with and without SEN, were strong and unanimous advocates of children with SEN attending mainstream schools. For those in mainstream, they discussed the benefits as being the ability to be socially included both at school and in later life. They recognised that parents were anxious about this and some told us that in their own schools, things weren't always perfect but that they want to be 'as employed and visible and everyone else'. They saw other benefits such as the school representing a truer cross section of society and indeed the one in which they would need to operate later within life. One non-disabled learner suggested that there was too much focus on the benefits of 'inclusion' for students with SEN and not enough on the benefits for learners without SEN, relaying how much he had learnt from a peer with autism. Fear of bullying within mainstream which was a consistent theme in all groups was also discussed by these learners who felt that cultures could change if you put children together early enough.

10 The Brent Knoll learners told us about very painful experiences of being bullied because they attend a special school. One said: 'I had some friends and then I told them where I go to school; they're still my friends but we've lost the bond', whilst others reported losing friends or being picked on when people find out which school they attend. These young people were unanimous in their positive view about the way that they are supported at the school and wanted to have access to the same level of support and understanding but within a resource base at a mainstream school.

11 The young people told us clearly that their access, learning, support and health needs must be met in a mainstream school. They went into some detail describing these needs to us but they were highly enthusiastic about the prospect of these needs being met in the context of a mainstream estate. They advocated a training programme for non-disabled learners at mainstream schools and peer mentors who would look out for them and help them when they got into difficulties.

12 There has been a strong level of support amongst written respondents for more children with SEN being taught in mainstream schools. This is particularly noticeable amongst parents of children with SEN attending primary mainstream schools. These parents say that the mainstream school is the right place for their child.

13 Mainstream schools are concerned about their ability to cope with SEN provision. Mainstream schools express views in written responses that although they support inclusion, staff should not be forced to take on a greater burden than that which they already have and some clearly state that the mainstream schools will not cope. Catford High points out that they feel schools have a vital role in determining whether a placement is suitable or not and Northbrook expresses concerns that young people could not be forced into places that are not suitable. Staff members who support the principles also express concern that placing children in mainstream schools can only work if much higher levels of training, support and advice are available to them.

14 Pendragon learners were anxious to not repeat previous poor experiences in attending mainstream schools. Although Pendragon learners were positive about their experiences at their own school, were critical of their previous experiences from mainstream school and the fact that they are targeted for bullying as a consequence of having Special Educational Needs. The difference between the groups is that the Brent Knoll learners were hopeful that changes to the culture and organisation of the mainstream estate could be made, whereas Pendragon students appeared to have arrived at the conclusion that things within mainstream would remain the same and were clear that they did not want to return at all.

15 The issue of parental preference was expressed more strongly in focus groups than in written responses. Parents in particular, and especially those whose children attend special schools, expressed concern that if the number of children with MLD or less severe incidence of need could not be placed in special schools in the future, then their choice as parents would be reduced. In fact the same parents also recounted their own experiences of not having been presented with choice of placement in the first instance and instead having to rely on the statementing process to secure a special school place for their child.

On the principle to provide an efficient service for statutory assessment for those children who still need it:

16 **Almost all parents and staff focus groups expressed concerns about reducing statements and a high degree of concern about the way that funding levels would be agreed, distributed and monitored.** The proposal to reduce the number of statements for children on lower matrix levels is discussed less in the written responses than it was at the focus groups. Almost all parents and staff focus groups expressed concerns about reducing statements and a high degree of concern about the way that funding levels would be agreed, distributed and monitored. The subject was also a considerable point of discussion in the main professionals' meeting.

17 **There is concern about effective provision in the absence of statements.** Many, but not all, parents who attended focus groups say that have fought hard to get a statement for their child and are very cynical about whether devolved resources would either be sufficient or would be appropriately spent on those children who need it most in the absence of a statement directing the school in how it provided resources

18 **There is lack of clarity and anxiety about how children will be assessed as to their suitability for attendance at mainstream schools.** The Green Party state that although they believe that it is a human right for children to be educated in an all ability setting, the proposals do not set out the assessment criteria. This concern was echoed in focus groups. In particular, the group for parents with children in special schools suggested that a transparent and third party assessment panel was introduced to ensure fairness of process and outcome. Special school staff in both focus groups and their written responses also expressed their concern that they do not feel that there is sufficient clarity at this stage about which children would be attending special schools in the future under the proposals.

19 **Parents with children at special schools and special schools themselves express particular concerns about the scrutiny with which spending would be monitored.** This concern is exacerbated by the fact that the level of understanding of SEN within mainstream schools is perceived to fall dramatically short of what would be required.

One particularly favoured principle was that the Authority and parents should have more direct dialogue with each other. Parents of children who use Respite Care were particularly vocal about this, welcoming more opportunity to receive information about what was happening to their child, better access to the 'bigger picture' and to be able to ask questions of the Authority when they needed. Nevertheless, most groups echoed this and groups were very keen to become members of a reference group, helping to reflect upon and shape future services.

Appendix 4

Detailed comment on the specific proposals

Improving the provision of SEN in mainstream settings including outreach services

1. **In almost all categories of respondents, there is a majority response in favour of improving the provision of SEN in mainstream schools.** In some categories - mainstream staff and schools and parents of children in primary schools - over 80% of respondents agree with this proposal. This said, the vast majority of the respondents qualify their answers and a significant number of respondents were not able to give a specific 'yes' or 'no' answer to the question, typically adding to their form that 'it depends'. Particular issues that are raised as qualification in response to this question are:
 - a) Outreach services should not be at the cost of special school provision;
 - b) Outreach services have limitations;
 - c) Some students are unable to cope in mainstream settings due to large class sizes, lots of different teachers and rigidity of practice;
 - d) The 'strain' on teachers in mainstream is already high and greater support is required;
 - e) The playground and social areas are as important as learning environments – children with SEN also need to feel they belong here;
 - f) Resources must be sufficient to support the schools, and
 - g) School performance criteria need to be reviewed to reflect a higher number of children with SEN
 - h) **The most common qualification in written responses to this question is that the improvement of mainstream must not be to the detriment of special schools.** This includes two issues: outreach services should not be considered as a proper substitute for special school teaching and support, and the increased number of mainstream places proposed should not cause a reduction of special school places.
2. **The most common qualification in written responses to this question is that the improvement of mainstream must not be to the detriment of special schools.** This includes two issues: outreach services should not be considered as a proper substitute for special school teaching and support, and the increased number of mainstream places proposed should not cause a reduction of special school places.
3. **There is significant concern amongst stakeholders that the amount of additional resources required to appropriately support children in mainstream may be so great as to be prohibitive.** This links with the common assertion that mainstream schools are already having great difficulty supporting children with SEN already on roll. There is a layer of mistrust expressed amongst some respondents that the Authority intends to make the required investment at all. This may derive from a belief amongst some stakeholders that the proposals amount to a 'cost cutting exercise' as described above. The stakeholders of course could not support such an argument if they were also to subscribe to a genuine intent to invest significant amounts in the mainstream estate.
4. **The organisation of mainstream schools does not support good practice in SEN.** Participants and respondents from mainstream and special school staff teams and unions consistently describe the 'strain' that they say is put on teachers and support staff where resources to support children with SEN are not available. Although they do not attribute the strain simply to this; the organisation of mainstream schools, with larger class sizes than special schools and policies and performance measures is seen to inhibit good practice and inadequate training is seen as a significant issue.
5. **Parents expressed very strong feelings about what they perceive to be a very poor understanding of the needs of disabled children amongst mainstream schools.** Union representatives also express clear concerns in both written responses and in face-to-face discussion about their colleagues and members being inadequately equipped with training, support or advice to work successfully with the combination of children with SEN and their mainstream, non-disabled peers.
6. **Many respondents and participants expressed the view that there are currently inadequate places for children with Autism.** Particularly in the context of a dramatic rise in diagnosis rates. Whilst not all of them welcomed the proposed arrangements, increasing the number of places appears to be an essential improvement. A number of

participants and respondents questioned the sufficiency of the proposed number of places available in meeting the increasing diagnosis of children on the Autistic Spectrum. As a related issue, as described earlier, a number of respondents say that they feel that the number of these places is reducing under the proposals where it is in fact increasing. We suggest that these stakeholders do not perceive that additional places provided through the new resource bases are comparable or 'real' places.

7. Some stakeholders, and in particular unions and mainstream schools, state that the management of behaviour is not adequately addressed either through the current provision or through the proposed arrangements. Participants in focus groups and respondents from mainstream secondary schools say that they wish the Authority to consider the behavioural issues associated with children with SEN in the wider context of their general intake – this was a particularly strong theme of discussion in the focus group at Catford High but was also raised in other staff focus groups and is articulated in a number of responses, including those from parents. The Unions state their concern as being about the 'critical balance' of learners who have behavioural difficulties as well as other impairments in large classes and the difficulties that this causes the whole school population, including those learners with no behavioural difficulties. A number of stakeholders at various focus groups stated that there is a significant percentage of children who have behavioural difficulties that do not have any diagnosis at all and they are concerned that resources allocated to schools to manage the behaviour of a 'standard' class would be inadequate. This was a particularly noticeable concern at the focus group for Catford High and that of the union representatives. Northbrook school said that greater flexibility in the working relationship between Abbey Manor College and the mainstream estate, with more dual roll placements and outreach work was an important improvement that needs to be made.

8. There is concern that the rise in the number of children with behavioural difficulties has not been adequately provided for. A recurrent theme expressed by groups of stakeholders throughout the engagement process was that they felt that the numbers of students with behavioural difficulties has risen and that this increase is neither taken into account in mainstream schools nor acknowledged in the proposals with an associated plan to improve provision. The former of these assertions is expressed most commonly by staff from secondary schools and the schools themselves.

9. A very small number of written respondents stated a very clear dissatisfaction with provision at special schools, stating that the schools did not teach their child adequately or prepare them for real life, describing them as 'baby sitting services'.

10. In several focus groups, considerable criticism was levelled at the ability of mainstream schools to support and properly teach children with SEN, though this was not raised in support of argument to improve provision in mainstream. More commonly, this view was asserted in support of an argument to maintain if not increase special school provision. In fact a small number of participants told us that investing in mainstream schools was a waste of money and that it would be better spent on special schools.

11. There is a belief that mainstream schools are failing learners with SEN. The belief that mainstream schools are currently 'failing' a significant number of learners with SEN has been one of the most consistent assertions across almost all categories and respondents and focus group participants, regardless of whether stakeholders said they thought something should be done about this. By contrast, parents of children in mainstream primary schools stated an opposite viewpoint.

12. Attendance at a special school is perceived by young learners to be a major barrier to their acceptance into a mainstream school environment. In their focus groups, young people from special schools recounted examples of their experiences in mainstream schools and they generally linked these to the fact that they attend a special school. Their reasons ranged from teachers and other staff not understanding their learning and behavioural difficulties (and therefore not being able to manage them properly) to what they perceive as the lack of flexibility within the mainstream system. The latter includes an example of a young person believing that the reason they attend special school is that no one in their previous mainstream school knew how to give them their medication.

13. Learners consistently praised the way in which their own special schools supported them, and there are perhaps some common areas which are useful when thinking about how to transfer good practice from special schools to mainstream. Common themes in groups was the shared feeling that in special schools, learners 'difficulties' were understood and 'no big deal'; in fact those learners from mainstream school said that they had also experienced some sensationalism and curiosity about their impairment when they first joined a mainstream school.

14. Young people consistently talked about the need for schools to balance understanding their difference, the range of their needs and meeting those needs with treating them 'just like everyone else'. One learner from a mainstream school told us about a time when she had sent a rather rude email and being told 'we will respond to you through your LSA'. She was frustrated by this and said she felt slightly patronised.

15. Striking the right balance between ‘strictness’ and ‘kindness’ is a skill found in good special schools.

Meadowgate learners told us ‘we like our teachers because they are strict and kind’, and although there was no specific articulation of this, there was an implication that previous teachers had not been able to strike that balance.

16. Pendragon learners consistently expressed strong views that special schools were the only solution for learners like themselves though they were perhaps the most vocal in expressing their high levels of dissatisfaction with their experiences of mainstream schools.

17. In written responses, those who state that they are satisfied with the current provision generally relate this to their own experience of their child and in general these responses come from parents and staff from the special schools most affected by the proposals. A number of respondents use the phrase ‘don’t mend it if it isn’t broken’ but again this often relates to the learning experience of specific children for whom the special schools are clearly working well. These views are mirrored by staff and governors of special schools, who state that they want to retain their current organisational arrangements regardless of what other improvements they would like made.

18. A significant number of staff in mainstream schools voiced their very strong support of the proposal to have greater input from the special schools and high satisfaction about the outreach services provided by Brent Knoll primary school. Staff and governors from Brent Knoll said that their outreach service is at its most effective when they can provide mentees with the ability to observe real teaching practices at the school and that this service cannot be provided if the primary provision is phased out.

19. In addition, staff from special schools expressed concerns that they themselves are inadequately resourced to provide an effective outreach service whilst still maintaining their own role. In order to perform a role successfully, they state that they will need additional expert training so that they can retain and improve their skill levels. Finally these staff expressed anxieties about whether their jobs would change and whether they would under new arrangements be required to work in mainstream rather than in special schools.

Views about the Introduction of Resource Bases

20. In each category of respondents to the written consultation, there is a majority response in favour of the introduction of resource bases. As is the case with other questions however, a large number of those who said that they agree with this proposal also expressed reservations, provided caveats or conditions. The main caveats and reservations are summarised as follows:

- a) The bases are suitable for some but not all children with SEN;
- b) There must be sufficient resources, including trained and skilled staff if they are to work for children;
- c) The bases should be complementary to special school places rather than replacing them;
- d) Parents and professionals should have a strong voice and choice in where children are placed;
- e) The number of resource base places must be sufficient for those children who need them;
- f) The social needs of children with SEN, including interaction at break times and extended school activities must be also taken into account in introducing bases into mainstream schools;
- g) Funds for children with SEN in mainstream must not be solely used within a resource base but must be used for those who are simply within the mainstream classes

21. Many stakeholders state that they have concerns about the potential isolation of children in resource bases and the likelihood of bullying. These views are particularly expressed by parents of children who attend special schools, special school staff and special school students. In fact this was the most common anxiety expressed by students from most of the special schools during our engagements, though students at Brent Knoll talked with some optimism about the possibility of changing this culture and training learners and staff to be more aware of their needs.

Students with and without SEN attending mainstream school talked at some length about bullying and said that bullying was less of an issue in reality than parents thought and one added ‘parents always worry’. Another felt that where there were a greater numbers of children with disabilities, the culture was more likely to change.

22. Several key themes emerge that support the proposal. Several key themes emerge in the reasons for supporting this proposal. The following summarises the themes:

- a) The bases will help more children with learning difficulties;

- b) The schools need specialist resources to teach children effectively;
- c) The bases will support those children with SEN already absorbed within the mainstream roll;
- d) The bases will provide a good transition point between mainstream and special schools and vice versa
- e) **The proposed phasing out of Brent Knoll colours the views of respondents towards resource bases.** Many respondents, and particularly those staff and parents from primary schools, expressed a specific view about the bases in relation to the proposed phasing out of Brent Knoll Primary provision, vehemently opposing this proposal, whether they generally agreed with the proposal to introduce resource bases or not. Of written respondents, two thirds of staff who raised this concern were from two schools, Myatt Garden and Lucas Vale.

23. **There is a suggestion from some respondents that every school should have a resource base.** Several respondents suggest in their written responses that every school should have a resource base and this was also raised in parents' focus groups. There are three reasons that stakeholders give for this suggestion. The first is linked to other discussions about the belief that there will be more places needed than those provided. This argument is also expressed by multi agency professionals including the Early Years Team. The second reason is one of proximity to children's homes and is linked to the principle that the borough should provide places in Lewisham; some parents stated that their most local school was actually across the Borough boundaries in a neighbouring Authority. The third reason is one of parity in culture; a range of stakeholders express the view that if the inclusive culture is to work, all schools should have specialist provision.

24. **There is concern that resource bases will be less successful in secondary schools than in primary schools.** A number of parents with children in mainstream primary schools state that they are less sure that bases will work in a secondary school culture than in primary schools and this view that secondary school culture is not appropriate is also expressed by unions and secondary school staff.

25. **Perrymount primary school is praised by parents and professionals.** Several of the parents with children at Perrymount Primary School state how happy they are with the way that the school has worked with them and their child. Praise for the school is also shared by professionals; Honor Oak Early Years Centre says of Perrymount 'Excellent school. It fully embraced children with SEN. There were no barriers and they were able to adapt where necessary. When I visited with a prospective family, they were friendly and welcoming'.

26. Specific praise was given to Sedgehill by a parent with a child attending the school whilst some others whose children go to special schools said that Sedgehill mainstream students bullied their children when they saw them on school transport.

27. **The National Deaf Children's Society (NDCS) express a view that Sedgehill school will need to employ deaf role models, deaf instructors, communications support workers and interpreters and will need to establish new ways of working.** It makes a more general comment that disabled children can become more isolated in a resource base than in a mainstream school. It further states that choice should be offered to parents with children with disabilities and that resource bases are only one type of service within what needs to be a continuum.

28. **Those who directly oppose the proposal to introduce the resource bases are represented in each stakeholder category and include amongst them some of the unions.** Some of their reasons for not supporting the proposal are already described earlier in the report and relate to the capacity of mainstream schools to manage the additional intake, and specifically, the 'critical balance' of children without SEN and those with SEN in any one school. This point was re-iterated in focus groups and stakeholders raised the issue that as they saw it, many children had additional needs but fell below the statementing threshold so that resources and support to meet their additional needs were not available; as a consequence when a large number of these children were enrolled in any one school, they felt that the balance overloaded the teachers and that adding a resource base in this context was inappropriate and perhaps unworkable. The NUT also state that the staff who will need to be up-skilled in schools with resource bases should be properly remunerated.

29. **Staffing of resource bases is inadequately explained in the proposals.** The Headteacher of Pendragon School takes issue with the phraseology used during the course of engagements in describing the way resource bases will be staffed. In particular, he questions the use of the phrase 'staffed similarly to special schools' and makes the point that this would mean replicating the breadth and depth of expertise in his own staff team, and would include the need to provide staff who had high levels of skill and experience in both SEN and curriculum areas. This last point was also raised by the staff team at Pendragon during their focus group. Pendragon staff were extremely concerned about the resourcing of bases and wanted reassurance that learners placed in this arrangement would receive both SEN and subject specific teaching expertise in equal measures, so that there is a comparable learning experience and the same high level outcomes for young people placed in a resource base rather than a special school. They stated that very size

of bases suggests to them that they would not have the capacity to deliver the breadth of the curriculum offer that is provided by Pendragon.

30. Concerns about the staffing arrangements for the bases were raised throughout the consultation. The staff at Brent Knoll, Pendragon and Meadowgate expressed specific anxieties about their own futures since they currently represent a significant proportion of the specialist staff within the Authority. They asked a number of questions such as: ‘Will I be redeployed?’ and also ‘Will I be expected to train other staff and if so how will this happen?’ and ‘How might my role look later if special school staff are going to support the staff in bases?’ Staff found it difficult to be reassured by our explanation that it is too early in the process to have arrived at this level of detail. A related issue was also raised across stakeholder groups that staff with the skills and qualifications required would not be available in sufficient numbers to staff the number of bases within the proposed timescale.

31. The process of directly engaging stakeholders revealed a level of misconception amongst participants about the nature of a ‘resource base’ and some of those who attended with an already fixed position on the proposals found it difficult to shift their position during the group. Others, by contrast found that in developing their understanding about how they could work in practice and how they are working elsewhere were pleasantly surprised, reassured and intrigued. One parent told us:

‘I don’t think people understand what these are about – I didn’t. At the moment, they just feel loss and they don’t really know what’s coming’ and another said ‘if they work, I feel much easier about my child going to mainstream’.

32. They still expressed a need to be reassured about the availability of funding to support the bases and a strong desire to support their implementation with advice and training. Some parents talked about their own positive experience of having a child in a resource base either in Lewisham or other Authorities.

33. Concern over ‘who decides who goes where?’ was frequently expressed. This was asked by parent and staff groups alike but most noticeably in groups associated with special schools. An extreme level of anxiety and anger was expressed by some parents who told us that they believed that the bases would be inappropriate for their own child and for others like them, and that they feared that the children concerned may no longer be eligible for a place at a special school in the future.

34. A significant number of participants and respondents have expressed anxieties about whether under the new arrangements children and their parents would have choice about whether to opt for a special school or a place in a resource base for their children. We believe that this in part is created by their interpretation of the principle that ‘every child who can should go to a mainstream school’ and the proposed increased focus of special schools on young people with a higher incidence of need. In short, they said that they believe that young people with a lower incidence of need will have no choice but to go to a resource base if they decide to remain in borough. Some even said that they had been told this by the Director for Children and Young People. Concerns about lack of choice were perhaps most strongly voiced in relation to the proposal to phase out primary provision at Brent Knoll and many parents said that there would be no choice for children like theirs if Brent Knoll Primary is phased out.

35. Many stakeholders said in engagements that they would feel more reassured about the appropriateness of the new resource bases if they could see some evidence of their success. If so, was it measured transparently and impartially by a third party, advocating a longer lead in time for implantation and trialling or piloting of solutions. Evidence that the proposed arrangements worked in other authorities was also welcomed as a means of reassuring parents, staff and other stakeholders, including the ability to talk with their counterparts and peers already using similar resources.

36. Although many advocated pilots, parents often didn’t want their own child to be part of the pilot and thought this should be an option available for those parents who wanted the bases. We would suggest that this type of concern about transformation is echoed throughout the country and is particularly prevalent in the culture of BSF educational ‘transformation’; staff, learners and parents need to be assured that the present generation of learners will not become acceptable casualties in achieving the big picture goals.

37. New arrangements would need to be sufficiently flexible to meet the needs of all children. There was considerable discussion amongst respondents and participants of focus groups about the wide spectrum of impairment amongst learning disabled students and its unique impact on the individual. So the ability of the new arrangements to be sufficiently flexible to meet all children’s needs has been a strong theme throughout as has been who decides what the ‘cut off point’ is for learners to be placed in special schools. In the absence of definitive answers to questions about who would be eligible for one type of placement over another, we observed a general tendency to assume that either the complexity of issues had not been understood by the Authority or worse that a more sinister policy of placing children in arrangements that could be afforded rather than where they really need to go.

38. **In summary, a significant proportion of concerns appear to stem from an uncertainty about a future state which is new and untested for most of the respondents and participants.** As a consequence, respondents would like these concerns allayed by the introduction and transparent publication about the change process once decisions about whether to proceed with each of the proposals have been reached. Facilitating contact with others who have either been through the process or who currently use similar resource base arrangements seems an important element of any change programme. Stakeholders would also be more reassured if the success criteria of the resource bases is set out and preferably in partnership with them so that early success can be monitored.

39. **Resources bases have some strong advocates amongst stakeholders.** Despite all the concerns raised by stakeholders about resource bases, there were several participants in focus groups who were strong advocates of those currently in place and a general satisfaction with the blend of specialist input and contact with the mainstream mix of the school population was expressed. Several parents told us that their child was thriving under such arrangements in Lewisham schools and that this was absolutely the right place for them. There was a general level of enthusiasm amongst parents of younger children about the ability to enable their child to learn in an environment which more closely matched the society in which they will later live. One parent said ‘you cannot wrap them up in cotton wool, regardless of your desire to protect them. We made a conscious decision that our children would go to a mainstream school to reduce the adjustment that they need to make later and to teach them to overcome barriers earlier rather than later’. There was some shift in perspective throughout the period of engagement from parents who began with a fixed position that resource bases were unworkable and inappropriate and later said that they could see that the bases could be valuable for some children, although these parents still had a residual fear that resource bases will ultimately cause the reduction of places at special schools and perhaps will be used as a justification for a greater reduction in years to come.

40. **There has been considerable debate both in face-to-face focus groups and articulated in written responses about the availability of multi-disciplinary support within the proposed resource bases.** This appears to be an issue that concerns learners, staff, parents and even the professionals who provide such services. In particular the current local shortage of therapists which does mirror the national picture was described as a significant concern and there is considerable and widespread enthusiasm for a vision which includes a step change in this type of specialist provision, though this is evenly matched by cynicism amongst stakeholders that these staff could neither be afforded or secured.

41. The PCT expressed a strong desire to dramatically increase the extent to which joint planning takes place at a strategic level between themselves and the Children and Young People’s Directorate, although It is likely there will be no additional funding injection from the health service.

Views about the proposed increase in provision for children with Autistic Spectrum Disorder and other complex needs in other schools

42. **A significantly higher proportion of stakeholders are in favour of these proposals than those who are not.** Over three quarters of parents with children in mainstream schools agree with the proposals and over half those from each of the other parents categories also agree, including parents with children at special schools. Teaching staff and other professionals have also indicated agreement by a significant majority. Nevertheless, there has been a high degree of opposition expressed by some specific groups and anxiety in a much broader range of others about what this proposal means in practice. As is the case with other questions in the proposals, a significant percentage of respondents who agree with increasing provision express reservations or attach caveats to their responses.

43. **Again, respondents confined their responses to their own situation rather than the general proposal.** A characteristic of responses to this proposal for restructuring three special schools is that respondents who are parents with children at specific schools and staff of the individual schools affected generally confine their comments to the schools or services with which they are associated with rather than commenting on the total proposal, and perhaps those proposed changes which would directly impact on them themselves.

44. It is also characteristic of responses to these proposals that many respondents who agree with them focus their comments on the need to address unmet needs and lack of in-borough places of children with ASD rather than the needs of children who currently attend the schools affected.

45. **Whilst there is general consensus that more places are required for learners with ASD and other complex needs, there is considerably less consensus about the way in which those places should be provided.** A significant number of respondents express a belief that there should be a new school for these children and that existing places at the current schools should not be altered to accommodate them.

46. As is indicated in responses to the proposals for introducing mainstream bases, responses to this proposal also frequently state a need for respondents to better understand the nature of the children that would attend the special schools in the future and an associated unease that the impact on the children currently attending the schools is less clear than respondents would like.

47. **The PCT and CAMHS express concern that children with Complex needs and ASD are very different groups but are being considered together within the proposals.** They express a concern about frail/delicate complex needs children being placed in the same provision as children who may have challenging behaviour. They state that there will be a need to address appropriate respite care needs for both these groups of children.

48. **The Health response also states that they think there is a serious under-estimation of the numbers of children and young people within the ASD spectrum.** They suggest that the provision will have wide-reaching impact across all agencies in meeting needs, for example local respite service, and that there should be an adequately resourced service to diagnose, provide interventions and give support to families locally. They suggest that immediate discussions are required to ascertain what sort of multi-agency resources will be required to meet the holistic needs of children and young people with ASD and state that Outreach teams from ASD provision will be required to be flexible to enable the meeting of needs during acute phases of their lives.

49. **The CAHMS and the PCT combined response questions whether the ASD provision will be able to meet the needs of adolescent pupils with very severe challenging behaviours** and suggest that implementing the proposals will require appropriate respite provision locally to support children and young people to remain at home in borough, and particularly for those with challenging behaviours. They state that the dedicated resource locally would increase the need for mental health services.

50. **They further state that keeping children and young people with a diagnosis of ASD in Lewisham would require additional CAMHS resource** to assess needs, manage medication and provide ongoing support to the child, family and also education staff. In addition the state that the proposed provision will have a significant impact on health resources as these C&YP require holistic care, provided by all agencies including Mental Health, Occupational Therapy and Speech and Language Therapy. They state that there is currently no educational psychology input into the ASD service.

51. **There is no clear response to the proposed amalgamation of Meadowgate and Pendragon schools.** Amongst those in favour of the amalgamation of Meadowgate and Pendragon schools in a new all-through school are a significant percentage of parents with children at Meadowgate but a much lower number of parents with children at Pendragon. The number of written responses from parents at both schools is much lower than we had anticipated given the strength of feelings in opposition to the proposals at focus groups.

52. **Health professionals and some mainstream schools expressed their support of the proposed all-through school** stating that the new arrangement would enable a better consolidation of resources, far better transition planning between primary and secondary provision and consistency for the children attending.

53. **In their focus group, Meadowgate children also expressed a desire to have the secondary school closer to them and said that they liked this idea.** It meant that they would not lose relationships with their teachers or the school, that they would have people they knew and trusted if things went wrong and that they could return to ask for support and to visit their friends more easily. However when asked about whether the secondary element should be immediately next to the primary or slightly separated, they were less certain, with many wanting a clear physical separation between the two. Pendragon students by contrast were unanimously opposed to the all-through school saying that they would not like the children from the other school and that they would not get on. They also said that there would not be sufficient room on the Pendragon site to accommodate more children.

54. **A significant number of responses show that respondents believe that the number of places proposed for the new school is less than the combined number currently provided** by Meadowgate and Pendragon and therefore state that they consider the proposal will bring about a loss of places rather than a gain as the consultation paper suggests.

55. **In addition many respondents' comments and those expressed during the engagement period suggested that they felt that the proposals amount to closure of the special schools .** Several parents, unions and staff from the special schools quote Lord Adonis' comments: 'when local authorities reorganise their provision for children with SEN they don't close special schools without first demonstrating that the replacement provision will be an improvement on what went before' suggesting that no evidence has been provided that the proposed arrangements will improve upon what is currently provided in place.

56. **There is a very strong sense amongst learners at both Pendragon and Meadowgate that the services that they currently receive are those that they both want and need.** Learners from each school very favourably contrasted their experiences at their special school with those of a mainstream school; 'we are a family, we understand each other and help each other – no-one is different here'. We were concerned that despite clear group organisation and preparation for our session by students from Pendragon, they appeared to believe strongly as a group that their school was going to close and expressed high levels of anxiety about this prospect. We have some concerns that the perpetuation of this notion has contributed to the strength of opposition where it has been expressed to date.

57. Concerns about the suitability of the existing Pendragon site are expressed throughout the written responses and became a recurrent topic of discussion in both parent and staff sessions. Staff at Pendragon expressed specific concerns that moving their site would mean that many of the lower paid staff who they said they felt bring an important level of expertise would not be able to travel to a new site and that they would have to leave their jobs instead, causing a destabilising effect.

58. There are very few instances where respondents have commented on the proposal to add a post-16 provision at Brent Knoll but those who do comment are in favour of providing such a provision.

59. Parents recognise the need to reorganise the special schools estate but there remains a high level of anxiety. Whilst a high level of anxiety about the proposals to re-organise the special school estate was expressed by parents with children at the special schools concerned, there was also a widespread agreement that the number of children and young people with a higher and more complex level of need is increasing and that places are not available in borough to enable them to learn locally. Meadowgate, and to a lesser extent Pendragon, fully acknowledged that the numbers of children with Autism with a much higher level of need that they teach are already increasing and that they are likely to continue to rise. Meadowgate governors and staff from all three schools stated that they have already begun to take children with a much higher level of need and there are varying degrees to which respondents infer a level of disingenuousness on the Authority's part in consulting on a change that they say has already taken place.

60. Parents concerned about whether all-through school will have enough places to cater for the two client groups. The views expressed are generally not resistant to this gradual shift in the balance of client group though both schools express concerns about whether the numbers of places within the total population of the proposed all-through school will be adequate to cater for the numbers of children with this level of need.

61. A concern expressed amongst respondents and focus group participants is that the increasing focus of special schools on intake of learners with higher levels of need will impact their ability to take young people with a lower incidence of need and the ability of mainstream schools to cater for these learners. This concern is rooted in their experience of their own school populations having a high number of children who have 'been failed' by the mainstream schools. The extent to which they believe that these children have been wrongly placed in the first instance, and who should always have been in a special school is not entirely clear. However all three special schools that we spoke to had significant anxieties about the ability of mainstream schools to appropriately cater for the students who did not have the higher incidence of need in both the short and the medium term.

62. Staff from Meadowgate and Pendragon schools are concerned about the move to an all-through arrangement. Meadowgate and Pendragon say that they have developed an increasingly close working relationship with each other in recent years as Meadowgate is the natural feeder school for Pendragon. Staff team from each expressed considerable concerns about moving to a new culture within an all-through arrangement if the consequence of this is that they lose the excellence in provision and their own balance that it has taken such a long time to establish.

63. Both schools asked questions about their own training if they are to have a significantly raised profile as expert resources within the Authority. We would concur that many of these staff are likely to have such high levels of skill that on more generalist courses they may in fact know more than their trainers so 'master class' and high level training will need to be arranged for them so that they can maintain their skills levels.

64. Concerns about the proposed amalgamation of the two schools focus heavily on the safety of younger learners. For learners from Meadowgate, the prospect of being bullied by much older children was of primary concern to them, though there is no evidence to suggest that students with Autism are any more likely to bully their peers than those in mainstream. Several Meadowgate students expressed anxieties about moving to Pendragon and as might be expected, this is particularly noticeable for year six learners who are typically anxious about transition.

65. Staff from both schools expressed concerns about the personal safety of young people and were united in saying that they would prefer a clear physical separation of the primary and secondary facilities to minimise potentially dangerous incidents, but for these staff, the issue is more one of the low levels of empathy and understanding of danger that is prevalent in Autistic children than one of bullying by older Autistic children.

66. In addition to the formal consultation responses, Meadowgate parents faxed through their own response sheets to the Mayor (see 3.1.6) that seem to indicate that they have had their own meeting to debate the proposed amalgamation. From a total of sixteen responses, six are in favour of amalgamation and ten oppose the proposal.

Brent Knoll

67. **A very large number of responses from mainstream primary school staff, other professionals and parents with children attending Brent Knoll express praise for the school.** There is particular praise for the primary provision and for the outreach services that the school provides. Amongst written responses and in focus group discussions there has been consistent and very strong opposition to the phasing out of the primary provision at the school and this is expressed in a balanced way by stakeholders from different groups. Parents whose children attend Brent Knoll primary provision have been extremely vocal in their opposition to the proposals despite assurances from the Authority that their own child / children would not be affected. They say that their concerns are as much to do with the high level of satisfaction they have of the present service as with their concerns about their children's previous experiences of mainstream and that they remain entirely unconvinced that a resource base in a mainstream setting could provide an equivalent high level of service.

68. **In reference to Lord Adonis' statement quoted earlier, they were keen to discuss how a resource base would be an improvement above the special school provision that is currently available.** Concerns were also raised about the scale of change required to successfully embed a culture of inclusion and to set up effective resource bases. Timescales are as much a factor in this as anything else, and they wanted to know whether change needed to happen as fast as is proposed, preferring that resource bases are successfully established before the primary provision is taken away. Governors have expressed their anger that the consultation comes after the phasing out of the primary service has begun. It is true that the consultation paper covers changes that are already in place and those that are new.

69. **Brent Knoll staff, like other special school staff, re-enforced their belief that a special school place is precisely the right environment for some children** and made the point that their outreach and training service has its most powerful impact when mainstream staff can observe teaching taking place, advocating that some primary provision remains in the school. The school's collaboration with mainstream schools and alignment of the curriculum with that of mainstream was observed by mainstream primary staff to be extremely positive for young people.

There is less commentary about the proposed 6th form though we believe from the feedback we have received that this is generally welcomed and seen as a positive addition to the school.

70. **Like other special school staff, the Brent Knoll staff had anxieties about their future roles, including their job security.**

71. **A very high level of praise for all three of the special schools concerned was continuously communicated by parents with children attending those schools.** Indeed, this was reinforced by the students themselves. However, we had the impression that a number of children had been placed in special schools less because it was the right place for them and that their placement had been a positive choice than that mainstream schools could not accommodate their needs. This was re-enforced by comments from some stakeholders. One young person who spoke English as a second language told us 'when I was at mainstream, I couldn't read or write – I learnt that here because they have helped me'. We wondered whether whilst laudable, that this was any more the role of a special school than a mainstream school and whether it was perhaps a factor of smaller classes and more one-to-one attention. Another learner told us 'I couldn't do the work and my teacher slammed the book on my desk shouting 'just do it' – I ran out crying and didn't want to go back. There are clearly a number of issues here but it seems that the culture of personalised learning and flexibility of service that is clearly reflected in all the special schools in question is one that should be adopted by mainstream and whether in fact when the solution to such incidents continues to be to transfer the young person to a special school place rather than address poor training, support and understanding, whether the culture in mainstream schools will ever be forced to change.

Views about the proposals for governance arrangements for the Hospital Education Service

72. **Within both focus groups and through written feedback, most stakeholders said that they had inadequate knowledge of the service to express a view.** In fact, with the exception of the focus group held with the Hospital Outreach Service itself, none of the focus group participants offered a view about the governance options.

73. **Those who answered the question tended to be directly employed by or closely connected with the HES.** Of those who have answered the question in written responses, there are a high number of stakeholders who are either staff from the Hospital Education Service itself or health professionals and organisations with a direct knowledge of, and perhaps regular contact with the service, as well as a learner. This is the only learner who has completed a written response within the consultation.

74. **These stakeholders unanimously and strongly state a preference for the service to be managed independently of Abbey Manor College as a Pupil Referral Unit.** The reasons they provide are as follows:

- a) The young people have entirely different needs from those of the young people attending Abbey Manor College;
- b) The specialist nature of the service is better promoted with greater management autonomy;
- c) The mental health needs of many of the Hospital Outreach Service users, which include acute anxiety and depression, may be adversely impacted upon if greater collaboration and contact with students from Abbey Manor College, many of whom have behavioural difficulties, were to result from a single management structure;
- d) The needs of the learners may be subsumed by those of the PRU student in strategic planning and funding decisions;
- e) The wholly vocational curriculum followed by the College's students may not be appropriate for those of the Hospital Service, some of whom are more skilled academically;
- f) Separate registration would meet DCSF best practice guidelines, and
- g) The service has thrived and grown since its management changed from the PRU to Brent Knoll.

Whilst very few other stakeholders expressed a view, those who did have also expressed a preference for the service to be managed independently. Whilst there are less specific views articulated that support this preference, where they are expressed they broadly align with those above. The most common reason given for this preference is the difference in needs of the children in the different groups.

75. Staff from the service itself stated clearly in their focus group that they wish to be self managing and independent of Abbey Manor College. One of the reasons for this is that their own client group have very different needs and characteristics to those of the young people attending Abbey Manor or John Evelyn; in fact their view is that the high levels of anxiety associated with their own client group's mental health conditions make the two groups of students entirely incompatible. This should be considered in relation to perhaps the clearest argument in favour of bringing the service under the governance structure of the PRU which is the ability to extend the vocational offer it has embedded to the Hospital Education Services students.

76. The Hospital Outreach Staff and their close associates state that the service's students are not necessarily suited to a vocational educational offering above an academic one. Staff perceive that having their own governance arrangements will enable them to legitimise their function and build their profile within the borough, providing in the future a higher level of preventative work and earlier intervention. They fear that by being managed by the PRU will lead to their needs being subsumed within an agenda and an approach that differs from their own.

77. Whilst the PRU Management Board have made a direct offer to take on the governance of the service, staff from the service stated that they had recently received a communication from John Evelyn setting out reasons that they could not provide a suitable environment of service for the one student they thought might benefit from learning within the PRU.

Appendix 3**Consultation document****Proposals for improving the education of children with special educational needs in Lewisham****Contents**

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Introduction

In Lewisham we aim to do the best for every child. This means making sure they are able to gain all the knowledge and skills they need to become confident adults who are good members of their local communities and able to play their part in society.

For children with special educational needs, our main principles are:

- (i) that they should be able to go to a school in Lewisham and
- (ii) that as many children as possible can go for all or part of their learning to ordinary (mainstream) schools, so that they can learn and play alongside other children with a range of abilities and backgrounds.

Many do that already, and some of the children in special schools spend a day or more a week in mainstream schools. However, too many children have to go out of Lewisham to a special school, especially when they reach secondary age. This is particularly true for the growing number of children with autism and other complex difficulties.

There is much good practice in Lewisham. We have some staff in mainstream schools very skilled at working with children with special educational needs (SEN), and our special schools offer various levels of 'outreach', support to the mainstream schools, to help them to work well with children with SEN. Some special school teachers see pupils in the mainstream and give advice to their staff. One particular special school, New Woodlands, which teaches children with emotional and behaviour difficulties, runs the borough's support service for that type of need, and takes some mainstream children on a short term place, which helps them to be more successful when they go back to their mainstream school.

There are also things we need to improve. We have to provide more places for children with autism in schools in Lewisham. We need to move on from a position where the options for a child are either just a special school or just a mainstream school. We need all our special schools to become the local authority service for their particular specialism, providing support for staff in mainstream schools and more flexible types of placement for children with particular kinds of SEN.

There are many successful models in the country of 'specialist resource bases'. These are specially funded bases in mainstream schools for children with a particular type of need. In these the school employs specialist staff and the children with that special need are taught for part of the time in the base and for part of the time with specialist support in mainstream classes. The results of OFSTED research in 2006 "Inclusion: Does it Matter Where Pupils are Taught?" demonstrate the value of this approach.

The proposals are intended to increase the number of specialist places offered in the borough and any redistribution of costs will maintain the total level of expenditure on special educational needs provision in mainstream schools, in specialist resource bases and in special schools. No child currently attending a special school affected by a proposed change will be expected to move unless the parents and the school, working through the usual Annual Review process consider a move or other change to be in the child's best interests.

Lewisham will benefit over the next few years from national finance in a programme called "Building Schools for the Future". We intend to make use of this to help us to redevelop some of our special school provision, as well as for the proposed changes in secondary schools noted below.

This consultation

The proposals in this document were presented to Mayor and Cabinet on 10 January 2007. The Mayor agreed to formal consultation being undertaken in the period from February to May 2007. The outcome is intended to lead to the development of specialist provision within

the borough to enable children¹ with special needs to have the best possible learning opportunities as well as to equip them with the skills to take them successfully into adulthood.

The period of consultation will run from 26th February 2007 to 7th May 2007. The Authority will hold a number of events with people from key groups concerned with children with SEN during the months of March and April. In addition, there will be a public event on April 23rd (see page 78) and another for professionals on a date to be arranged. We intend that all those with an interest in the development of specialist provision should have an opportunity to ensure that their views are heard. Attached to this document is a consultation response form to enable you to submit your comments in writing. The consultation process will be led for us by the Place Group, which is a commercial consultancy independent of the Authority. They will analyse and report to the Authority the responses to the consultation.

Summary

The proposals on which we would like your views are:

- Increasing the ability of mainstream schools to teach and support children with SEN better and more flexibly, with, for example, greater input from specialist teachers;
- Building on our own experience and nationally recognised good practice by setting up several new specialist resource bases in mainstream schools;
- Making changes to some special schools to have better local provision for children with Autistic Spectrum Disorders (ASD) and other complex needs.

We are also using the opportunity of this consultation to seek views on changes to the management of the Hospital Education service.

The proposals in this document mean that there will continue to be special schools within Lewisham but there will be some changes in the way they are organised to ensure that the provision available within the borough matches the needs of the children the borough serves.

The proposals aim to ensure more children will be educated successfully in mainstream schools with specialist resources. They also aim to reduce both the number of children who, on transfer to secondary school, leave mainstream to go into special school, and the number who have to go to a special school outside the borough. By strengthening the links between mainstream and special schools we would also expect to gain the flexibility of placement referred to in the introduction.

Current Provision for Pupils with Special Educational Needs

There are currently 6 special schools and both secondary and primary Pupil Referral Resource bases (PRU) in Lewisham providing a range of provision.

- **Watergate School** – 75 places for boys and girls aged 4-11 years. This school caters largely for pupils with severe learning difficulties (SLD) including pupils with profound and multiple learning difficulties (PMLD). Watergate School is the primary feeder school for Greenvale School for many pupils. This is a new, purpose built school.
- **Greenvale School** – 83 places for boys and girls aged 11-19 years with SLD including (PMLD). This is the secondary school for many primary pupils transferring from Watergate School. Its new building next to Forster Park School is planned for completion in August 2007 and it will eventually offer 100 places.
- **Meadowgate School** – 70 places for boys and girls aged 4-11 years of age with learning difficulties. This school has in the past catered largely for children with moderate learning difficulties (MLD) and associated needs. Over the past three years Meadowgate has changed its provision so that it can meet the needs of children with

¹ In this document “children” means children and young people.

more complex needs including children with autistic spectrum disorder (ASD). It has developed some excellent practice. Recent development has done much to restore parental confidence in in-borough ASD specialist provision and reduce the pressure for primary out-borough placements. The buildings are in poor condition.

- **Pendragon School** – 123 places for boys and girls aged 11-16 years with moderate learning difficulties (MLD) which has usually taken most of the children from Meadowgate School and some from mainstream primary schools. The school has specialist school status for Humanities. Pendragon has adapted the building to make some good provision for pupils with autism who transferred from Meadowgate School in September 2005 and September 2006, but more places are needed at secondary level. It would be hard to continue adapting the building to include further groups of pupils with ASD.
- **Brent Knoll** – 128 places for boys and girls aged 4-16 years with mixed needs. The buildings consist of new build attached to more traditional 1960s buildings. The secondary provision is cramped for the needs of the students who are there. The primary children usually all transfer to the secondary department. Originally designated for “delicate” children, it now takes children with language and communication disorders, including a significant number with autistic spectrum disorder, others with emotional difficulties and a small number with severe physical or medical needs.
- **New Woodlands** – 40 primary places plus 12 in a primary aged Pupil Referral Unit (PRU). This is a primary school for pupils with emotional and behavioural difficulties. There is a major building project being undertaken at the school, due for completion by September 2007. This will extend it to cater for a further 48 pupils in Key Stage 3 of whom up to 24 may have statements. Others will be there for short-term intervention. The school provides an extensive behaviour support service across Lewisham and this will be increased in Key Stage 3 once the current building work is completed.

The above schools all have some teaching staff who are equipped with advanced skills, and provide some support to mainstream schools within the borough.

- **Abbey Manor College** – situated on two campuses under one Executive Headteacher, this is registered as a Pupil Referral Unit for up to 160 secondary pupils. It makes provision for children who are at risk of exclusion or have been excluded from school. At Key Stage 4 there is an exciting vocational curriculum with strong progression routes into Lewisham College. It will also take on to this programme at Key Stage 4 those young people from New Woodlands who have continuing needs for support related to their difficult behaviour and social interaction. It has a key role in Lewisham’s 14-19 Strategy. The Broadoak Campus has been refurbished so that the vocational subjects can be properly taught. The John Evelyn site is in need of development.
- **Lewisham Hospital Education Service** - The service provides education for children with physical or mental health needs. It deals with approximately 600 children and young people a year; the majority are short stay admissions in the hospital and there is a smaller number of long stay and recurrent admission pupils. Teaching is in the Hospital Schoolroom, for in-patients, or via a home tuition service (minimum 5hrs per week) for those who are away from school for a long period with a diagnosed medical condition. In addition, for those in Key Stage 4 with referrals from the mental health service and who are not attending school, a provision of 1:1 or small group teaching is made for between 5 and 10 hours a week, now at the Old Schoolhouse next to Lee Manor Primary School. The service is currently managed by Brent Knoll School.

There are already some recently developed specialist resource bases in mainstream schools in Lewisham.

- **Deptford Green** - provides 25 places for children with Specific Learning Difficulties/Dyslexia. Placement is made through the SEN Panel for children with and without statements from anywhere in the Borough. The resource base will be redeveloped under Building Schools for the Future.
- **Coopers Lane Primary** – has a unit providing a Total Communication approach for 12 children with Hearing Impairment who need to access the curriculum through signing.
- **Kilmorie Primary** – provides 10 places for children with Learning Difficulties and Disabilities. There are plans to develop Kilmorie further, in the second stage of the Children's Centre² programme

In addition, the longer established resource bases in **Sedgehill** (secondary) and **Rushey Green** (Primary), for children with Hearing Impairment, will be redeveloped as the schools are rebuilt. At present the unit at Sedgehill is set up for those who use their residual hearing and lip reading (an oral/aural approach). Under the proposals changes will be required to ensure the resource base meets the local need. It will offer a Total Communication approach, which includes the need for signing.

As part of the school's normal admissions process **Sydenham** takes a small number of girls with visual impairment. Similarly, **Haberdashers' Aske's Hatcham College** takes around 5 pupils a year who have an autistic spectrum disorder.

Reasons for change

A large number of pupils with a statement are currently placed in schools outside Lewisham, reflecting a lack of provision within the borough. It is not in the best interests of children that so many are placed outside their home communities. A significant number of children are placed in these schools because they have behaviour difficulties or autism. The opening of the secondary provision for children with behaviour difficulties at New Woodlands in September 2007 will help meet demand but provision for pupils with autism remains inadequate. An opportunity is provided through the Building Schools for the Future (BSF) programme to make physical changes to secondary buildings to match the provision we wish to make.

The particular gap in provision for children with autistic spectrum disorders is linked to a steady increase in the number of children diagnosed with ASD. In 2005, 458 children 0-16 were diagnosed as having an autistic spectrum disorder; this figure increased to 551 children 0-16 in 2006³. This puts great demands on our existing schools. The national picture of provision for such children has been described as poor (HMSO Report 2006)⁴. The Government is determined to improve how children with autism are taught. While the increasing prevalence of ASD means that there will be children in almost all Lewisham schools with this need, it is essential that there is also some specialist provision.

There is a relatively high proportion of children with statements of SEN in Lewisham, compared with neighbouring Boroughs and nationally. The number of pupils with a statement in Lewisham has reduced slightly in recent years from 1668 in 2004 to 1531 in 2006 (shown in the table below) but this is still a high level compared to most Inner London Boroughs. Where the process of acquiring a statement is seen by schools and parents simply as a way to gaining additional resources, the time taken and associated bureaucracy are not helpful to schools. The numbers of statements in other Authorities are lower partly because they have delegated more funding to schools to support pupils after early identification of their SEN. This means that at present statements are being given to some children in Lewisham who

² A Children's Centre would offer multi-agency services to young children and their families – that means help from the Health Service, from education and children's social services, and voluntary groups.

³ Figures by Gill Stephenson & Tony O'Sullivan, Communications Clinic, February 2006

⁴ House of Commons Education and Skills Committee (HMSO) Special Educational Needs, Third Report of Session 2005-06

would not have them in other boroughs. Lewisham will be delegating additional resources to schools from April 2007.

Placement of Lewisham children with statements of SEN

	2004	2005	2006
Maintained Special	625	626	637
Non-Maintained Special	52	59	60
Independent	31	38	30
Total in special schools	708	723	727
Total in Mainstream	960	848	804
Total number of statements	1668	1571	1531

All those in independent and non-maintained special schools (about 90 each year) are educated outside of Lewisham borough, as are a further 120 children attending special schools maintained by a local authority outside Lewisham. The proportion of children placed in special schools as a result of new statements is reducing but despite this that proportion remains high when compared with national figures.

Special schools in Lewisham have all been assessed over the last 18 months by OFSTED as being of high quality. They are popular schools and all places are usually filled. However, the profile of some of the children currently on roll at Brent Knoll and Pendragon Schools is similar to children who elsewhere in the country would be in mainstream schools. Some parents within Lewisham have had poor experiences of their child's needs being met in mainstream schools and have a strong mistrust of mainstream schools' ability to cater for their children's needs. This indicates a clear need to increase the effectiveness of mainstream provision alongside the other proposals in this report.

The role of special schools in supporting mainstream schools to improve their provision is key. Through the intervention support of New Woodlands school, mainstream schools are now more able to work effectively with children who have challenging behaviour. This has led to a noticeable decrease in the requests for statutory assessment of primary age children with challenging behaviour since this support started.

Projections of numbers of pupils with statements for 2006-2015

The projections are developed recognising that in future it is the pupils with higher levels of need who will acquire a statement of SEN and for whom additional funding will be identified by the Authority. We have begun to provide additional finance to all schools, linked to the historical level in the authority of statements for lower levels of need. This finance will be part of that considered as normal school resources and this approach will align Lewisham with other Authorities. We have developed a methodology, based on 2005/06 numbers of new statements completed and on the expected population increase, for projecting the consequent demand for statements over the next 10 years as shown in the following table. While no projection can be certain the figures provide sufficient guidance for planning ahead.

Age Group	2006/07			2010/11			2015/16		
	3-11	11-16	16-19	3-11	11-16	16-19	3-11	11-16	16-19
Main Need⁵ (see footnote)									
ASD	143	77	10	150	120	16	149	140	27
BESD	67	178	15	21	121	31	20	57	21
HI	19	28	2	13	21	6	10	21	3
MLD	68	214	28	33	80	36	26	38	12
MSI	1	0	0	1	0	0	0	1	0

⁵ ASD-Autism Spectrum Disorder ; BESD-Behavioural, Emotional and Social Difficulty ; HI-Hearing Impairment ; MLD-Moderate Learning Difficulty ; MSI-Multi-Sensory Impairment ; PD-Physical Difficulty ; PMLD-Profound and Multiple Learning Difficulty ; SLCN -Speech, Language and Communication Need ; SLD-Severe Learning Difficulty ; SpLD-Specific Learning Difficulty ; VI-Visual Impairment.

PD	30	28	5	27	32	6	30	26	5
PMLD	13	14	6	17	10	5	21	8	5
SLCN	96	95	11	42	96	17	23	40	10
SLD	87	71	27	63	89	42	61	61	58
SPLD	42	145	11	10	52	20	4	15	7
VI	12	6	2	10	9	2	9	9	2
Age Group	578	856	117	387	630	181	353	416	150
Year Totals	1551			1198			919		

Lewisham's Principles

The following principles, set out briefly in the introduction, underpin Lewisham's approach:

- Every child who can be should be educated in a mainstream school;
- Support, training and resources should be provided to ensure that mainstream schools are confident and able to provide children with special needs with a high quality education;
- All special schools have an outreach function, to support and help to develop what mainstream schools offer.
- Children in special schools should have some opportunity, according to their needs, to learn alongside those in mainstream schools;
- Children and young people should be educated locally wherever possible;
- There needs to be a strong partnership between the Authority and parents; this requires good services and information;
- Resources from out-borough placements should be re-directed into mainstream schools;
- Early recognition of a child's needs and early intervention are vital. We will ensure funding is available at an earlier stage, not just through a statement;
- An efficient service for statutory assessment should be maintained for those children who still need it.

Policy Context

Lewisham's Children and Young People's Plan (2006) sets out our vision for improving outcomes for all children. It includes the need to improve outcomes for children with SEN and disabilities by ensuring that their needs are identified earlier and that more effective ways of meeting needs are developed. This is consistent with the Government's 10 year strategy "Removing Barriers to Achievement" which sets out five key objectives:

- Build capacity in the children's workforce to enable them to identify and meet children's needs
- Promote a continuum of local provision from mainstream through to specialist provision.
- Improve accountability for the outcomes children achieve
- Strengthen partnerships with parents and children
- Improve provision for children with Behavioural, Emotional and Social Difficulties and children with Autism.

The strategy for improvement

A key theme in this strategy is to move away from simplistic arguments about the placement of children in special or mainstream schools. Some have argued that there is a conflict between the school improvement and inclusion agenda. Helping children with SEN to achieve is fundamental to sustaining improvements in schools' performance. The OFSTED Report (2006) confirmed that as mainstream schools become more inclusive they are more successful at raising attainment for every child.

For many children with special educational needs the way the curriculum, teaching and learning are organised can be barriers to their learning. Our approach to improving outcomes for all children is to remove barriers to learning and to be more flexible so that teaching can more closely match their learning styles. Personalised learning is high on the national agenda. To support this, the Authority will:

- identify a suitable special or mainstream school to give support to others on developing personalised approaches;
- ensure that the National Strategies have a sufficient focus locally on SEN;
- introduce a system of “provision mapping” so that schools can evaluate the effectiveness of their approaches;
- develop models of good practice for working in multi-disciplinary teams. For example, our Behaviour Educational Support Team (BEST) includes education psychology and child mental health workers. The recently opened Lewisham Centre for Children and Young People (Kaleidoscope) has been developed expressly to further such working;
- encourage schools to keep under review their arrangements for SEN and provide support and challenge when concerns are raised;
- improve the Authority’s arrangements for monitoring schools’ performance in meeting the needs of children with SEN.

The delegation of additional funding to mainstream schools which will become fully operational from April 2007 will provide further capacity in mainstream schools to meet the needs of children with SEN. Delegation of resources to collaborative groups of schools will enable them to commission a wider range of services to support children.

The proposals in more detail

Much of the recent debate on SEN has focused on the single issue of where children are taught. These proposals attempt to shift the focus away from this single issue towards the quality of children’s experiences and how they are helped to make progress with their learning and participate fully in activities of their school and community. The proposals increase overall specialist places for children. Specialist places demand specialist staff and it is those specialist staff which OFSTED evidence shows makes the real difference to pupils with SEN. Those in good specialist resource bases in mainstream schools are shown to make particularly progress (OFSTED Report 2006)⁶. This Authority’s proposals continue to expand on such provision.

(i) Increased and more clearly financed training and support for mainstream schools.

In mainstream schools the Authority will:

- increase the training of the staff who lead the work for children with SEN. There will be an expansion of the current programme, using national training materials to develop expertise in ‘early intervention’, and we will increase the skills of the leaders in this area to train other staff.
- train staff so that they have greater skills and confidence to help children with SEN. Through in-school and other locally provided courses both teachers and assistants will increase their knowledge and understanding, to work with children with autistic spectrum disorders, and those with communication difficulties.
- provide advice and guidance through the network of specialist resource bases and special schools.
- help staff to share across the borough methods which are successful. This will be linked to the increased collaboration between schools and opportunities for staff to visit successful provision.

These proposals build upon the good quality provision we have in our special schools, building on the strengths of each school. We would encourage schools to consider how best to work together, in collaboratives and federations, to bring new possibilities in leadership

⁶ Ofsted Report 2006 - Inclusion: Does it matter where pupils are taught?

and management, curriculum development and personalisation of learning. The key features expected of our special schools in supporting all children with SEN are that they will:

- provide advice across Lewisham for individual children with specific needs regardless of their placement
- provide training and other specialist guidance across all settings – mainstream schools, early years settings and Children’s Centres
- provide support to these settings so that children’s needs are assessed and met in a timely way while they are still young
- offer short term respite and assessment placements
- support children back into mainstream school from short or longer term special school placements.

(ii) Formation of Specialist Resource Bases in Mainstream Schools

We propose to build on our own experience and nationally recognised good practice by setting up several new specialist resource bases in mainstream schools. These function as alternatives to separate special schools. They provide opportunities, depending on the type and extent of a child’s special needs, for children to link into the activities and learning of mainstream classes as appropriate: maybe for tutorial time, maybe for one or more areas of the curriculum. Practice demonstrates that this can both increase and decrease over time depending on the child’s development. Pupils with statements showing a high level of a specific need would be identified by the Authority as suitable for these resource bases, while the schools in which they are established will appoint staff with particular skills and expertise in such work. In some cases additional building will be required. Each of the schools has been picked out or put themselves forward because they already work effectively with some children with the specific type of special educational need. The specialist resource bases will have specialisms around autism, communication, medical needs, and more general difficulties in learning. They will increase the opportunities for children with SEN to remain within their own local school communities

In primary schools the proposed new bases would be at:

- John Ball Primary – 16 places for children with Autistic Spectrum Disorder
- Tidemill Primary – 16 places for Speech, Language and Communication Needs
- Perrymount Primary – 16 places for Complex Physical and Medical Needs
- Forster Park Primary – 16 places for children with Learning Difficulties and Disabilities

In secondary schools they would be at:

- Catford High – 35 places for children with Learning Difficulties and Disabilities
- Addey and Stanhope – 25 places for Speech, Language and Communication Needs
- Bonus Pastor – 25 places for children with Learning Difficulties and Disabilities

It is intended that the number of pupils using the special provision will increase gradually up to the number of places listed. The following table shows the overall position of the Authority’s specially resourced provision by 2011 if the current and proposed mainstream resource base provision is put together with the academy links.

School	Difficulty	Places
Coopers Lane	Hearing Impairment – Total Communication	12
Forster Park	Learning Difficulty and Disability	16
John Ball	Autistic Spectrum Disorder	16
Kilmorie	Learning Difficulty and Disability	10
Perrymount	Complex medical & physical	16
Rushey Green	Hearing Impairment – Oral/Aural	12
Tidemill	Speech Language & Communication	16
Addey & Stanhope	Speech Language & Communication	25
Bonus Pastor	Learning Difficulty and Disability	25
Catford High	Learning Difficulty and Disability	35
Deptford Green	Specific Learning Difficulty (dyslexia)	25
Haberdashers' Aske's Hatcham College	Autistic Spectrum Disorder	25
Haberdashers' Aske's Knights Academy	Partnership with Greenvale school	Number to be finalised
New School (intended for 2010)	Learning Difficulty and Disability	20
Sedgehill	Hearing Impairment – Oral/Aural & Total Communication	25
Sydenham	Visual Impairment	6

(iii) Changes to some special schools to improve provision for children with Autistic Spectrum Disorder and other Complex Needs

Meadowgate and Pendragon

There is no specific local special school for children with ASD, therefore parental choice is limited. There are children with profound levels of need in each year group at Meadowgate due to transfer to secondary provision in September 2007 and beyond.

Whilst both Meadowgate and Pendragon schools have endeavoured to utilise the existing provision, their current accommodation requires substantial modification in order to meet the needs of those pupils with Autistic Spectrum Disorders. Therefore the Local Authority proposes:

- creating a newly built school for 120 pupils between the ages of 5 and 19 formed from the amalgamation of Meadowgate and Pendragon schools under one governing body and one Headteacher
- supporting it to develop strong partnerships with mainstream schools, particularly those with the designated resource bases, thus resulting in greater flexibility of placements
- helping it also to form strong links with Children's Centres, particularly those in Ladywell and at Downderry, so that they are supported in making early provision for children with complex needs and autism.

The vision for this new school is that it will

- reduce the need for pupils with autism to need to go out of the borough for their schooling;
- offer highly specialist provision developing from the much adapted curriculum now successfully in place and continuing to develop at both Pendragon and Meadowgate schools;
- take the lead in supporting mainstream schools to develop inclusive practice.

Brent Knoll

Given the continuing rise in numbers of young people with complex difficulties, including those with language and communication needs, changes are also proposed for Brent Knoll

School. The development of mainstream provision, and in particular the implementation of specialist resource bases in mainstream schools, means that some changes are needed at this school. While the quality of its existing primary age provision is recognised, the needs of such children can be met in well-provided specialist resource bases in mainstream schools. This will free up space at Brent Knoll to cater for children with more complex needs.

For some of the young people with complex communication difficulties leaving Brent Knoll at 16 it is difficult to find suitable further education provision. As Brent Knoll takes children with more complex needs it will become even harder and the benefits of a tailored curriculum in the school for some of this group, linked to that of other local schools and colleges, will be clear.

There is a continuing requirement for secondary places for children with a range of communication and emotional needs with associated learning difficulties, as well as further places for children with autism whose additional cognitive difficulties are not so great. Until all of the secondary school refurbishment is complete there will be an interim need for places for children with physical and acute medical needs. The Local Authority therefore proposes to adapt the provision at Brent Knoll School by:

- redesignating the school for children with complex and enduring learning needs;
- extending the age range up to 19, while phasing out the primary age group as alternative specialist resource bases are developed in mainstream schools;
- defining more clearly the intake as children with language and communication disorder and autism; very significant emotional needs; and severe physical/medical needs;
- reducing the number of pupils at the school to 84 as the primary phase decreases, so that it can better provide for children with more complex needs.

The vision for Brent Knoll is that it will:

- cater for the most complex needs in these areas so that children do not have to be placed outside of the borough;
- provide places for those children who need some intervention before moving on to mainstream, and provide respite and assessment places along with support for children and schools to take children on dual placements;
- offer highly specialist provision developing from the school's current adapted secondary curriculum;
- create the highest expectations of children so that they do have opportunities to be in a mainstream environment, with an expectation of pupils moving between special school and mainstream. We will use annual reviews of statements to consider the scope for a dual placement or transition to mainstream school;
- take the lead in supporting mainstream secondary schools to develop inclusive practice;
- share the expertise in the sector by becoming a Specialist School in the field of communication and interaction.

The proposal to increase the age range of the school to 19 strengthens the desire that Brent Knoll should work collaboratively with other schools. It will not be possible for the school to deliver the new 14-19 curriculum on its own. In particular, given the proximity of Brent Knoll and Forest Hill schools, and the fact that Forest Hill caters for a substantial number of boys with statements in areas of Brent Knoll's specialism, opportunities for pupils in both schools would be enhanced by linked curriculum development.

The proposed new school and Brent Knoll, like all of our special schools and the specialist resource bases, would provide an outreach service to support children regardless of their placement, delivered through guidance to teachers, training and flexible placements.

(iv) Changes to the Hospital Education Service, providing for Children with Medical Needs

Lewisham's Hospital Education Service is managed by a Head of Service under the auspices of the Headteacher of Brent Knoll School. At present the funding of the service has been

devolved to the governors of Brent Knoll but this does not provide a satisfactory legal status for the service. A recent review of the service recommended that the Authority reconsider its status. It is proposed that

EITHER

- this service is managed by the Executive Headteacher and Management Board of Abbey Manor College

OR

- we seek to register this service as a separate Pupil Referral Unit.

The management of the Service by the Executive Headteacher and Management Board of Abbey Manor College would allow it to benefit from existing management structures and professional development regimes, to explore synergies and to pool some resources. In some Authorities the Hospital Education Service is linked to another Pupil Referral Unit (PRU). Young people under the Hospital Education Service could benefit from aspects of vocational curriculum provision which would not be feasible in a separate unit.

Should the provision be registered as a separate Pupil Referral Unit it would enable the service to develop in a more independent way, and to take account of the particular needs of this group of pupils, which are arguably not the same as those of pupils in other types of PRU. DfES guidance states that good practice is for PRUs providing for pupils with medical needs to cater exclusively for them. This is reflected in guidance from professionals in health services. A mainstream curriculum is important to many of those in the Hospital Education Service to ease reintegration to a mainstream school.

Other specialist provision

Provision for children with Severe Learning Difficulties and Profound and Multiple Learning Difficulties

The severe and complex needs of this group will continue to require special provision. However, there will be greater opportunities for children to gain access to mainstream. Watergate currently has excellent partnership arrangements with mainstream primary schools and depending on the needs of the child there are part-time placements into their local primary school. There will be a special partnership arrangement between Haberdashers' Aske's Knights Academy and Greenvale; the rebuilding of the latter will mean that the schools are quite close together. Planning is already taking place between the two schools that will enable Greenvale students to spend some of their time at the mainstream school. Watergate and the new Greenvale schools provide excellent "fit-for purpose" accommodation. The proposal is to build on the work that has already begun and to develop a federation between the two schools which will mean that there will be a shared governing body committee and an Executive Headteacher of the two schools.

Provision for Children with Challenging Behaviour

Our strategy recognises that some children are more difficult to include than others – typically because they present challenging behaviour. The current and future roles of New Woodlands School and Abbey Manor College are detailed on page 69.

Time scales

Should the proposals under which we are consulting be agreed, we would start to implement most of the new arrangements from September 2008.

With regards to the proposed new school, it will be necessary to seek such establishment under a "competition" arrangement. There is, however some scope for the Authority with the Secretary of State's consent to seek such establishment without such a process.

As part of this consultation exercise the Authority wishes to establish whether any organisations or individuals are interested in running the new school. An expression of interest from interested parties should be submitted to the address on the response form at the end of this document.

Workforce Development

Many of these proposals will require training for staff which builds on their existing skills and experience. All those schools being identified to have adapted provision have experience in working with similar children and some skills among the staff. Under the proposals all staff in each school will have professional development which helps them to understand the key needs of the pupils and the range of approaches to learning which are likely to be most effective. Each school will also have one or more teachers, together with support staff, who have undertaken specialist training for the needs they are meeting and who will be in a position to guide others. This will be supplemented by on-going training from the appropriate special school.

Finance

The Building Schools for the Future (BSF) programme makes provision for addressing the capital renewal needs for secondary specialist provision, including Brent Knoll and the proposed rebuilding of Pendragon and Meadowgate as a single school for the 5 - 19 age group. Further funding will be allocated through the government organisation "Partnership for Schools" for the primary element.

Some capital costs are being identified. Some of the work necessary for the resource base at Perrymount has already taken place. The new provision at Tidemill is an integral part of the specification for the rebuilding of that school. The resources at John Ball and in the South Quadrant need to be provided, by additional building and/or by adapting existing space. Provision of resourced bases at Catford High, Bonus Pastor and Addey and Stanhope Schools will be within the BSF programme.

There is no intention through these proposals to reduce the overall sum committed to SEN provision. The out of borough placements are a significant cost at present, especially for residential provision, if it is given because there is no suitable school closer, and for daily transport. While the new provision in-borough will be funded to a good level there will be financial savings to be made which will be returned to the overall schools budget to support children with SEN.

Responses to this consultation

Place Group will be organising a range of meetings for focus groups attended also by officers of the Authority. The public consultation event will take place on **23rd April between 3pm and 8pm in the Council Chamber at the Civic Suite.**

Your response to the consultation should be sent by **7th May 2007**, preferably on the forms from this document to:

Freepost RRHS-ALLE-TUEE
SEN Consultation
London Borough of Lewisham
3rd Floor Laurence House
1 Catford Road
London
SE6 4RU

This paper can be downloaded from:
www.lewisham.gov.uk/educationandlearning

Should you wish to do so, you can email your response to:
sen.consultation@lewisham.gov.uk

If you have any queries about the content of this document please contact Ray Harris, School Improvement Officer, on 020 8314 8599.

Those requiring information in a language other than English, or for other formats, including Braille, large print, audio tape or computer disc should contact Tony Vera-Cruz, telephone: 020 8314 9062

Response Forms

Freepost RRHS-ALLE-TUEE
SEN Consultation
London Borough of Lewisham
3rd Floor Laurence House
1 Catford Road
London SE6 4RU

NAME

ADDRESS

.....

POSTCODE

I am representing an organisation in making this response
(please tick and specify)

NAME OF ORGANISATION

OR

I am making this response in my private capacity (please tick)

How would you best describe yourself in relation to this consultation?
(please tick one option)

Parent/carer	<input type="checkbox"/>	School governor	<input type="checkbox"/>
Member of school staff	<input type="checkbox"/>	Pupil/student	<input type="checkbox"/>
Member of local community	<input type="checkbox"/>		
Other (please specify)	<input type="checkbox"/>	

Does your child attend

Early Years Centre	<input type="checkbox"/>	Private pre-school provision	<input type="checkbox"/>
Portage	<input type="checkbox"/>		
Mainstream school	<input type="checkbox"/>	Special school	<input type="checkbox"/>
Mainstream school in a specialist resource base	<input type="checkbox"/>		
No provision	<input type="checkbox"/>		

Does your child attend a school in Lewisham? Yes No

What is the name of the school your child attends?
.....

What Year is your child in?

Do you have a child who has a statement of special educational needs ? Yes No

1	Is the existing school provision within Lewisham for children with SEN as you would like it?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Reasons	

2	Do you agree with Lewisham's principles for special educational needs provision (see page 72)?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Reasons	

3	Do you agree with the proposal for improving mainstream provision, which includes developing the outreach role of special schools?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Reasons	

4a	Do you agree that we should extend provision by setting up specialist resource bases in primary schools?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Reasons	

4b	Do you want to make a specific comment about any of the schools below in relation to the proposals? (if so, please tick the box by the school you are referring to.)	
	John Ball	<input type="checkbox"/>
	Tidemill	<input type="checkbox"/>
	Perrymount	<input type="checkbox"/>
	Forster Park	<input type="checkbox"/>

5a	Do you agree that we should extend provision by setting up specialist resource bases in secondary schools?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Reasons	

5b	Do you want to make a specific comment about any of the schools below in relation to the proposals? (if so, please tick the box by the school you are referring to.)											
	<table> <tr> <td data-bbox="188 1108 638 1153">Catford High School</td> <td data-bbox="638 1108 1447 1153"><input type="checkbox"/></td> </tr> <tr> <td data-bbox="188 1153 638 1198">Addey and Stanhope School</td> <td data-bbox="638 1153 1447 1198"><input type="checkbox"/></td> </tr> <tr> <td data-bbox="188 1198 638 1243">Bonus Pastor</td> <td data-bbox="638 1198 1447 1243"><input type="checkbox"/></td> </tr> <tr> <td data-bbox="188 1243 638 1288">Sedgehill</td> <td data-bbox="638 1243 1447 1288"><input type="checkbox"/></td> </tr> <tr> <td data-bbox="188 1288 638 1332">H.A.Knights Academy</td> <td data-bbox="638 1288 1447 1332"><input type="checkbox"/></td> </tr> </table>		Catford High School	<input type="checkbox"/>	Addey and Stanhope School	<input type="checkbox"/>	Bonus Pastor	<input type="checkbox"/>	Sedgehill	<input type="checkbox"/>	H.A.Knights Academy	<input type="checkbox"/>
Catford High School	<input type="checkbox"/>											
Addey and Stanhope School	<input type="checkbox"/>											
Bonus Pastor	<input type="checkbox"/>											
Sedgehill	<input type="checkbox"/>											
H.A.Knights Academy	<input type="checkbox"/>											

6a	Do you agree with the proposals to increase provision for children with autistic spectrum disorders and other complex needs in special schools?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Reasons	

--	--

6b	Do you want to make a specific comment about any of the schools below in terms of the proposals we are consulting on? (if so, please tick the box by the area of which you are referring to.)	
	Changing Brent Knoll to a school for children aged 11-19	<input type="checkbox"/>
	Re-designating Brent Knoll School to cater for pupils with complex needs	<input type="checkbox"/>
	Amalgamation of Meadowgate School and Pendragon School to form a school for children with ASD aged 5-19	<input type="checkbox"/>
7	Do you think that the Hospital Education Service should be: (please tick one option)	
	a) managed by the Executive Headteacher and management board of Abbey Manor College	<input type="checkbox"/>
	b) registered as a separate Pupil Referral Unit	<input type="checkbox"/>
	c) No view	<input type="checkbox"/>
	Reasons	

--	--

8	Do you have any other comments on the proposals?
	Please write comments below



About You

This section is to help us develop policy and services which respond to your needs.

Are you male or female?

- Male
- Female

Please select your age group

- Under 18 years of age
- 18-34 years of age
- 35-59 years of age
- over 60 years of age

Which of these activities best describes what you are doing at present?

- Employee in full-time job (30 hours plus per week)
- Employee in part-time job (under 30 hours per week)
- Self-employed full or part-time
- On a government supported training programme (e.g. Modern Apprenticeship / Training for Work)
- Full-time education at school, college or university
- Unemployed and available for work
- Permanently sick / disabled
- Wholly retired from work
- Looking after the home
- Other (please specify)

If you are disabled, would you describe your impairments as? (tick all that apply)

- Visual
- Speech

- Hearing
- Mobility (a wheelchair user)
- Mobility (not a wheelchair user)
- Learning disability
- Mental health
- Hidden impairment
- Other (please specify)

To which of these groups do you consider you belong?

- White - British
- White - Irish
- Mixed - White & Black Caribbean
- Mixed - White & Black African
- Mixed - White & Asian
- Asian or Asian British - Indian
- Asian or Asian British - Pakistani
- Asian or Asian British - Bangladeshi
- Black or Black British - Caribbean
- Black or Black British - African
- Chinese
- Other (please specify)

Data Protection Act 1998

The data collected will be subject to the Data Protection Act 1998. This information will be held on computer and will remain confidential. It will not identify you in any form and it will not be disclosed to any third parties without your consent. The data will be processed for statistical purposes only and will only be used in a form that does not allow you or any other member of your household to be identified. By returning a completed questionnaire you are giving your explicit consent for the data collected about you to be recorded and used for the purposes above. Under the Data Protection Act, you have the right to a copy of the data held about you by the London Borough of Lewisham.

Appendix 4

Accommodation Options

1. Key Factors

Before considering the various site options it is important to set out the four determining factors behind the feasibility work carried out thus far. These are:

- (a) Current standards and best practice
- (b) Site constraints and opportunities
- (c) Affordability
- (d) Deliverability

2. Site options and evaluation for new ASD School (120 places)

The evaluation and feasibility work has centred on the commitment to build a new ASD school for 120 places. Officers have looked at both refurbishment and remodelling of both Pendragon and Brent Knoll, and in doing so also visited maintained and independent special schools recommended by the National Autistic Society and DCSF. This experience, and the factors set out in Sections 12.11 – 12.15 above demonstrated that refurbishment of existing premises would not be the best way to provide appropriately for pupils with ASD, who benefit from buildings designed for their needs.

Four sites were considered for the provision of the new ASD school.

- (a) Leahurst Road (Ennersdale)
- (b) Meadowgate
- (c) Brent Knoll
- (d) Pendragon

A) Leahurst Road

Leahurst Road was considered unsuitable as the site for the new ASD facility for the reason that the current building has recently been refurbished and is in use as a decent facility for Northbrook School. In addition while the building is a strong one and is robust for continuing education use, it would be less than ideal for the specific and special needs of an all through ASD facility. As is set out below it is considered again as an alternative provision for an 84 place Brent Knoll facility.

B) Meadowgate

Meadowgate was not considered for the new ASD facility as it is considered too small to provide both the buildings needed and acceptably size play facilities.

C) Brent Knoll Site

An option for the new build for the ASD school on the current Brent Knoll site was also considered (in a scenario in which the site would be vacant). The advantage of this option would be to enable the newly built school to be developed on a cleared site. However the drawbacks of this option are twofold. Firstly a 120 place ASD school built in accordance with BB77 requires a gross floor area of 4700m² plus suitable external recreation areas. The size of the Brent Knoll site is only 4895m² and would not be of sufficient size to allow for acceptable external space. Secondly the only option for housing pupils during the rebuild would be at Leahurst Road, which given its current temporary use for Northbrook decent would not be available until September 2010. This would mean that any new build ASD school on the Brent Knoll site would not be available until December 2012.

D) Pendragon

Options for rebuilding the new ASD school on the Pendragon site were also considered. The site meets all the requirements set out in section 12 of the report, including BB77 while also allowing the flexibility of provision and play space required. Feasibility also indicates that the site will allow a rebuild to cater creatively for an all age school.

The two 1920s buildings comprising the existing school are in fair to good condition in respect of fabric and structural integrity but are not of any particular architectural merit. Rooms are generally on the small side (less than 45-50m² as compared to the 65m² required by BB77) and both buildings suffer from poor circulation due to narrow corridors and staircases. There is and will continue to be a maintenance liability from some original fabric such as windows, roof, etc. but they could remain in serviceable condition for the foreseeable future (20/25 years) against a proper Planned Maintenance schedule.

The location of the existing buildings tends to fragment the external play area and there is an appreciable amount of what could be construed to be wasted space, particularly on the northern and western boundaries. Also the middle play ground is in shadow for significant periods of the autumn and winter terms, which is not entirely satisfactory.

Any new development would seek to eliminate this fragmentation by locating the new build against the northern and eastern boundaries so creating a generous play area to the south that will not be in shadow at any time of the year. Current car parking provision, for staff and mini-bus(es), is about a dozen spaces and there may be a need to replicate this in any new development.

The current feasibility shows two and three storey accommodation with the Primary provision occupying the ground floor with shared facilities. More mature students in Secondary and Post 16 occupy 1st and 2nd floors. It is considered that a three storey building is appropriate for the more mature SEN pupils as the building will be fully DDA compliant. The planning implications of a three storey building on the site are being addressed with LBL Planning although it is thought not to be a problem. It may be necessary to move the second and third storey parts of a block away from the eastern boundary to make the proposal more acceptable to adjacent dwellings.

The Gross Internal Floor Area (GIFA) of the new build will be 2.07 times larger than the existing provision. One of the reasons for this is that BB77 standards are very generous compared with, say BB98 standards. For example the range of classroom size for 30 pupils in a BB98 scale school is from 56-60m², whilst that for 6 – 8 SEN pupils is set at 65m², virtually a four-fold occupancy density increase. Other functional areas within the school are similarly increased in size over above BB98 standards. General comparison between BB98 and BB77 “education area provision” shows that the former provides about 8m²/pupil and the latter 40m²/pupil, which is 5 times as much.

A total new build will enable a design that is fully compliant with the best current design and construction standards, i.e. there will be no compromises that necessarily arise from a refurbishment/conversion scheme. The current feasibility assumes sharing of common facilities such as plant space, catering, general office, reception, some circulation etc. for maximum economy and results in a GIFA of 4573m². However if this configuration was not considered to be desirable for organisational/educational reasons then a solution predicated upon a complete functional and physical separation of Primary and Secondary provision has been reviewed but results in an increased GIFA of 5088m². With regard to sustainable development an “Excellent” BREEAM rating will have to be achieved through a 100% new build and a minimum 20% contribution to on-site renewable energy will be provided; this would not be achievable in a part or full refurbishment of the existing buildings as energy performance will be dependent on building fabric not necessarily designed with energy saving in mind.

The external spaces are just as important as the internal spaces in a SEN school and the possibility of external ‘teaching gardens’ on the south of the building for Primary pupils is an attractive and very usable concept. Their immediate adjacency to generous external play areas, both formal and informal, will make pupil supervision by staff easy but unobtrusive. The space provided by such a school proposal is far less fragmented than the existing external areas and therefore subsequently deemed to be more usable.

The desirable drop-off and pick-up bays can be easily incorporated into the new design proposal from either Pendragon or Roundtable Roads. These could be within the schools secure fence line, or not, as the school desires.

The construction of the new school can be undertaken in a phased manner to negate the need for decant of pupils off-site. Whether this is desirable from a continuing education point of view would be for SEN specialists to say but there is a point of view that states the construction activity, however well managed or considered, will be a distraction or at least disturbing for some pupils. Technically though the phased construction is feasible and deliverable in the following manner:

- Erect a temporary boundary to screen off the existing car part and MUGA.
- Construct the three storey block on this site for some Primary, Secondary, and all of Post 16
- Decant some pupils into completed block and vacate existing 2-storey Block B, Existing Block A retained for some pupils
- Relocate temporary boundary to isolate existing Block B
- Demolish Block B and construct remaining 2-storey part of new build

- Complete construction of new Block B to make connection between new Blocks A & B during a school holiday
- Decant pupils into completed facility
- Relocate temporary boundary to isolate existing Block A
- Demolish existing Block A
- Complete external works and handover

Via the strategy above the new build scheme is considered deliverable. The lines of demarcation both physical and organisational are clear and discrete and the risk of one activity adversely influencing concurrent or future activities is low. However the overall construction duration will be extended (and cost increased) because of the need to conduct the demolition / build in an ultra-considerate manner.

Realistically, development of the design and construction of the new school can only begin once consultations have been completed. If these are complete by July 2008 the new school could be finished within a period from December 2010 and December 2011. Until more detailed work is carried out it is not possible to be any more precise at this stage.

If an off-site decant were preferable, the most likely current site would be the Leahurst Road site once vacated by Northbrook. This would allow the new school on the Pendragon site to be completed within a period of between eighteen and twenty four months.

3. Site Options and evaluation for Brent Knoll school (84 places)

A) Redevelopment of the Facility Brent Knoll Site

The main Brent Knoll School was built in 1960 and a new Music Room(s) annexe has been recently (2007) completed.

The construction is a mixture of different forms of construction ranging from, steel framed construction for the hall and some larger spaces, to in-situ concrete for some skeletal elements and floors, to an odd form of roof construction that consists of pre-cast concrete beams supporting wood-wool infill panels in the manner of beam-and-block floor. This makes future adaptation and conversion complex and risky (from a construction delivery perspective) as there is a need to correctly manage the interface between different materials that all have different performance and serviceability characteristics.

During feasibility it was clear that the structure has significant problems arising from the concrete roof slab being supported by load bearing masonry walls. While this inherent design fault is not critical, it is concluded that it does cause concern if the building were to be viewed as suitable for long term conversion for refurbishment. Put simply it would not represent value for money.

As a result officers considered the viability and deliverability of re-providing Brent Knoll on the Leahurst Road Site.

B) Redevelopment on the Leahurst Road Site

Ennersdale Primary School is an extremely robust, traditionally constructed building with a mainly Victorian provenance. Significant parts date back to 1892 but despite its age there is no indication of any structural distress or failure of integrity. In the recent past there has been pressure to Locally List the building although this has been resisted to date.

There is local failing of fabric, e.g. stone parapet copings, flashings, etc, but these items can be easily remedied, but in overall terms the building is in good condition. Subsequent to being raised to a fully refurbished and converted state it is considered that the effective life of the building will be 100 years and probably more given satisfactory future routine maintenance. The reason for this view is that the constituent materials of brick, natural slate, natural stone, and under-stressed reinforced concrete and wrought steel elements are inherently long-lived with only routine maintenance. Even joinery, albeit 'old-fashioned' is still sound and some of the single glazed external sash windows are original and over a 100 years old. In any refurbishment these would of course be replaced by more energy efficient designs. Generally the existing building is a very good basis for a 'new' SEN school.

Current enabling works for the Northbrook decant has introduced significant betterment to the building as a whole. The building has limited adaptability by virtue of its load bearing masonry /

riveted wrought steel construction although space provision is already well provided and distributed. Classroom sizes are generally good at around 55/60m² and could be utilised immediately with very little alteration. Overall the school provides usable space for 3600m² against BB77 requirement of 3178m² an overprovision of over 13%. Additionally the actual space provision (as opposed to the BB77 requirement) is 1.62 times larger than the existing Brent Knoll school. This latter feature affords space for additional intake at very little or no cost.

The individual floor plates of the school will, it is considered, provide a safe and secure environment for vulnerable pupils, and at the same time provide light and airy spaces because of the generous storey heights. The main problem with the building is the restricted vertical circulation due to narrow and inflexible staircases, although with the greatly reduced number of pupils (84 for Brent Knoll SEN as opposed to over 500 for the current Northbrook occupancy) this should not be a problem. The addition of lifts in strategic locations (for standard DDA compliance) will provide the necessary improvement in vertical circulation.

A minor point against the building form is the internal layout, combined with locations of staircases it is not necessarily intuitive in respect of way-finding for pupils of indeed staff new to the building. This could be much improved in even a limited scope conversion by sight line development, use of colour / lighting, and signage.

It is unlikely that a BREEM rating of better than "Very Good" can be achieved although the wholesale replacement of building services and improvement of external fabric proposed as an integral part of the refurbishment / conversion will significantly improve the "carbon footprint". However the retention of an existing building ticks lots of "sustainable development" boxes as the embodied energy for refurbishment and conversion is very significantly less than that expended in a new-build replacement; this also scores high BREEM points.

The school site is already enclosed by high masonry walls and as such provides a secure and safe environment for informal and formal play areas. Drop-off and pick-up points are slightly constrained by the fact that the bounding roads, Leahurst and Pascoe Road are one way in the same direction. A drive through for vehicles could be considered although this would use up valuable play space.

In summary therefore, the scope of the refurbishment and remodelling work to convert the Leahurst Road site to a school for Brent Knoll would include the following:

- Full review of area/room layouts and circulation to meet the needs of the pupils best
- Full review of external envelope and improvements to provide a 60 year life span
- Special allowance and consideration to the SEN teaching space and requirements such as improved compartmentalisation and sound transfer
- Upgrading and full renewal of M&E services to the building
- Full review and upgrade for DDA requirements and location of lift and ramps
- Improvements to the sustainability of the usage of energy
- Major upgrade to the internal finishes of decoration and flooring
- Introduction of new ICT provision to meet the needs of SEN teaching

4. Summary and Conclusion

The feasibility work carried out as set out above has attempted to balance the primary objective of delivering high quality SEN facilities with budget and site constraints. It is the view of the Executive Director of Regeneration that the strategy will be best serviced by providing the new ASD facility on the Prendragon site, and re-providing the Brent Knoll school at Leahurst Road.

Should there recommendations be accepted by the Mayor further more detailed work will be carried out prior to detailed programme and project timescales being agreed.

Appendix 5

The figures here show the number of places that will be available if the proposals are carried through, compared with the number provided in July 2007 in Lewisham special schools and specialist resources.

Special schools		
	July 07	Proposed
Brent Knoll	128	84
Greenvale	85	100
Meadowgate	70	
New Woodlands	48	72
Pendragon	125	
Watergate	80	86
New ASD school		120
TOTALS	536	462
Specialist resource bases		
Addey & Stanhope		25
Bonus Pastor *		25
Catford High	7	35
Coopers Lane	8	8
Deptford Green	25	25
Forster Park		16
Holbeach *		16
John Ball		16
Kilmorie	5	10
New Secondary		20
Perrymount		16
Rushey Green	8	8
Sedgehill	25	27
Sydenham	6	6
Tidemill		16
TOTALS	84	269
OVERALL SPECIALIST PLACES	620	731

The two further tables below show for the primary and secondary phases separately how the necessary additional places noted in section 7 of this report can be offered. In the primary phase the proposals provide 27 additional places, compared with a demonstrated requirement for 37. There is currently a significant number of pupils with similar high level needs successfully attending Lewisham mainstream schools, not in specialist resource bases (for example, 31 at present with a diagnosis on the autistic spectrum). It is reasonable to consider a small increase in that number through the next ten years. The proposed increase in local specialist places for the secondary phase will allow a substantial decrease in the number of pupils educated outside of the authority.

* Conditional on Mayor's decision.

Needs currently met at Brent Knoll Primary and Meadowgate, compared with proposed provision in 2015-16

	2006-07		2015-16
Brent Knoll	48		
Meadowgate	70		54
Kilmorie	5		10
Tidemill			16
Forster Park			16
John Ball			16
Perrymount			16
Holbeach			16
Watergate			6
TOTAL	123		150

primary phase of a 5-19 school
5 further places become available
Conditional on Mayor's decision
additional places for pupils with ASD
increase of 27 in specialist places

Needs currently met at Brent Knoll Secondary and Pendragon, compared with proposed provision in 2015-16

	2006-07		2015-16
Brent Knoll	80		84
Pendragon	125		66
Addey & Stanhope			25
Catford High	7		35
Bonus Pastor			25
New Secondary			20
Greenvale			15
TOTAL	212		270

secondary phase of a 5-19 school
Conditional on Mayor's decision
increase in available places in new building for pupils with ASD
increase of 58 in specialist places

Glossary of Terms

AEN	Additional Educational Needs
APA	Annual Performance Assessment
ASD	Autistic Spectrum Disorder
BSED	Behaviour, Social & Emotional Difficulties
CAHMS	Child, Adolescent and Mental Health Service
DfES	Department for Education & Skills
EBD	Emotional & Behavioural Difficulties
ECM	Every Child Matters
HI	Hearing Impaired
LA	Local Authority
MLD	Moderate Learning Difficulties
MSI	Multi-Sensory Impairment
PCT	Primary Care Trust
PD	Physical Disability
PMLD	Profound & Multiple Learning Difficulty
SEN	Special Educational Needs
SENCO	Special Educational Needs Co-ordinator
SENDIST	Special Educational Needs & Disabilities Tribunal
SI	Sensory Impaired
SLCN	Speech Language & Communication Need
SLD	Severe Learning Difficulties
SpLD	Specific Learning Difficulties
VI	Visual Impairment

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MAYOR & CABINET		
Report Title	Exclusion of the Press and Public	
Key Decision	No	Item No. 17
Ward		
Contributors	Chief Executive (Head of Business & Committee)	
Class	Part 1	Date: 19 January 2011

Recommendation

It is recommended that under Section 100(A)(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 3, 4 and 5 of Part 1 of Schedule 12(A) of the Act, as amended by the Local Authorities (Executive Arrangements) (Access to Information) (Amendments) (England) Regulations 2006 and the public interest in maintaining the exemption outweighs the public interest in disclosing the information:-

- 101 Closed Minutes of the meetings held on December 1 and 22 2010
- 102 Inclusion of Community Support Team in the Learning Disability Supported Living Recommissioning Programme

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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