

INTEGRATED IMPACT ASSESSMENT

Gypsy and Traveller Site(s) Local Plan

Pro Vision Planning and Design

August 2016

Prepared on behalf of: The London Borough of Lewisham



GYPSY AND TRAVELLER SITE(S) LOCAL PLAN
SUSTAINABILITY APPRAISAL
PROJECT NO. 1403

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Non-technical summary

This document provides a report of the Sustainability Appraisal, Strategic Environmental Assessment and Equalities Analysis Assessment of the Lewisham Gypsy and Traveller Site(s) Local Plan. The purpose of the Integrated Impact Assessment is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Lewisham Gypsy and Traveller Site(s) Local Plan.

This report has been prepared considering the consultation responses to a Scoping Report which has determined the principal matters to be addressed by the Integrated Impact Assessment. The scoping process identified the following sustainability issues.

1. To provide sufficient housing and the opportunity to live in a decent home
2. To improve the health of the population
3. To reduce poverty and social exclusion
4. To improve accessibility to leisure facilities, community infrastructure and key local services
5. To reduce crime, antisocial behaviour and the fear of crime
6. To reduce car travel and improve accessibility by sustainable modes of transport
7. To mitigate and adapt to the impact of climate change
8. To improve air quality and water quality, manage water resources and reduce noise and vibration
9. To increase, maintain and enhance open space, biodiversity, flora and fauna
10. To mitigate flood risk
11. To maintain and enhance landscapes and townscapes
12. To conserve and where appropriate enhance the historic environment
13. To minimise the production of waste and increase waste recovery and recycling
14. To encourage sustained economic growth
15. To promote access to employment, education, skills and training

The Integrated Impact Assessment incorporates the requirements of the European Strategic Environmental Assessment Directive (2001/42/EC), which states that a formal assessment should be undertaken of plans and programmes that are likely to have significant effects on the environment. The Integrated Impact Assessment has been prepared taking into account the Council's obligations in relation to the Equalities Act 2010 and the Council's equalities objectives.

The Integrated Impact Assessment process is designed to ensure that planning decisions are made that accord with the principles of sustainable development. The timing of the Integrated Impact Assessment, from the initial stages of the plan-making process, aims to make sure that sustainability considerations are taken into account early in the formulation of policy documents, including the Lewisham Gypsy and Traveller Site(s) Local Plan.

The Integrated Impact Assessment starts with an evaluation of the existing situation and then assesses how the Lewisham Gypsy and Traveller Site(s) Local Plan would affect each aspect of sustainability identified through the scoping process. Impacts are positive, neutral, negative or uncertain.

The two preferred alternative sites for the 6 pitches required in the London Borough of Lewisham set out within the Lewisham Gypsy and Traveller Site(S) Local Plan are New Cross Social Club and the adjoining land, and land at Pool Court.

The provision of gypsy and traveller pitches at New Cross Social Club, and the adjoining land, could have a detrimental effect on health, social inclusion and accessibility to community infrastructure through the loss of a social club and a multi-use games area. The provision of gypsy and traveller pitches at Pool Court could have a negative effect on landscape, biodiversity, flora and fauna through the loss of open space.

Proposals for monitoring, to identify significant sustainability effects of implementing the Lewisham Gypsy and Traveller Site(s) Local Plan so that remedial action can be taken if required, are set out in this report.

1.0 Introduction

- 1.1 Pro Vision Planning and Design has been instructed by the London Borough of Lewisham to prepare an Integrated Impact Assessment, incorporating a Sustainability Appraisal, Strategic Environmental Assessment and Equalities Analysis Assessment, of the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 1.2 SAs are intended to support the selection of options in the preparation of plans and to provide a mechanism for reviewing alternative options whilst assessing how the plan will contribute to the achievement of sustainable development. This IIA seeks to identify the economic, social and environmental impacts of the potential sites presented in the Lewisham Gypsy and Traveller Site(s) Local Plan. It includes discussion of the likely significant sustainability effects of its implementation and recommendations are made relating to the ways in which potential adverse effects can be reduced or beneficial effects can be enhanced. The report includes proposals for relevant environmental, social and economic indicators to monitor the effects of the implementation of the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 1.3 SAs must incorporate the requirements of the Strategic Environmental Assessment (SEA) Directive to ensure that the significant environmental effects arising from policies, plans and programmes are identified, assessed, mitigated, communicated to decision makers, monitored and that opportunities for public involvement are provided. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment.
- 1.4 The IIA considers the London Borough of Lewisham's obligations in relation to the Equalities Act 2010 and the Council's equalities objectives. The assessment has due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations.
- 1.5 Assessing policies from a sustainability perspective (including environmental, social and economic sustainability) alongside an equalities perspective will enable an holistic assessment of the alternative sites for gypsy and traveller accommodation. There are overlaps in the above assessments and therefore an approach that addresses the statutory requirements for Sustainability Appraisal, Strategic Environmental Assessment and Equalities Impact Assessment into a single integrated assessment will be used.
- 1.6 The Scoping Report, the initial stage of the IIA process, consisted of the collection of baseline data and information on other plans, policies and programmes that could influence the preparation of the Lewisham Gypsy and Traveller Site(s) Local Plan. The data collected was used to identify the key sustainability issues, objectives and targets at multiple spatial scales.
- 1.7 The Gypsy and Traveller Site(s) Local Plan is currently at the Potential Site(s) Regulation 18 (stage 2) consultation stage. The Local Plan will identify and designate land in the borough to accommodate the identified need for sites for Gypsies and Travellers.
- 1.8 Section 2 of this IIA Report provides a detailed description of the methodology for the IIA. The context, baseline and objectives of the IIA are set out in Section 3. The IIA is presented and the significant effects are discussed in Section 4. Measures for mitigation and monitoring are considered in Section 5.

2.0 Methodology

SUSTAINABILITY APPRAISAL

- 2.1 The purpose of the IIA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of development plans. The UK Government Sustainable Development Strategy 2005 defines sustainable development as follows:
- 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.
- 2.2 The IIA of the Lewisham Gypsy and Traveller Site(s) Local Plan aims to ensure that the principles of sustainability are embedded into the plan-making process, forming an integral part of plan preparation. The IIA takes a long-term view, reflecting global, national, regional and local issues. The IIA identifies opportunities to enhance positive performance and to address negative impacts from an early stage in the process of policy formulation.
- 2.3 The stages which the IIA will follow are based on the Government's Planning Practice Guidance. The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004 have also been used to inform the stages followed. These stages are set out in Table 2.1 below. Stage A of the IIA process is covered within the IIA Scoping Report. This IIA Report documents stages B, C and D. Stage E will be completed following the adoption of the Lewisham Gypsy and Traveller Site(s) Local Plan.

Table 2.1: Stages of IIA

Gypsy and Traveller Site(s) Local Plan: Evidence Gathering and Engagement
<p>IIA Stages and Tasks</p> <p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>1: Identify other relevant policies, plans and programmes, and sustainability objectives</p> <p>2: Collect baseline information</p> <p>3: Identify sustainability issues and problems</p> <p>4: Develop the IIA framework</p> <p>5: Consult the consultation bodies on the scope of the IIA Report</p>
Gypsy and Traveller Site(s) Local Plan: Consult on Local Plan in preparation Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
<p>IIA Stages and Tasks</p> <p>Stage B: Developing and refining alternatives and assessing effects</p> <p>1: Test the Local Plan objectives against the IIA framework</p> <p>2: Develop the Local Plan options including reasonable alternatives</p> <p>3. Evaluate the likely effects of the Local Plan and alternatives</p> <p>4: Consider ways of mitigating adverse effects and maximising beneficial effects</p> <p>5: Propose measures to monitor the significant effects of implementing the Local Plan</p>

Gypsy and Traveller Site(s) Local Plan: Prepare the publication version of the Local Plan
IIA Stages and Tasks Stage C: Prepare the IIA Report
Gypsy and Traveller Site(s) Local Plan: Seek representations on the publication Local Plan (Regulation 19) from consultation bodies and the public
IIA Stages and Tasks Stage D1: Seek representations on the sustainability appraisal report from consultation bodies and the public
Gypsy and Traveller Sites Local Plan: Submit draft Local Plan and supporting documents for independent examination Outcome of examination
IIA Stages and Tasks Stage D2: Consider implications of the outcome of the examination for IIA compliance
Gypsy and Traveller Sites Local Plan: Adoption and Monitoring
IIA Stages and Tasks Stage E: Post adoption reporting and monitoring 1: Prepare and publish post-adoption statement 2: Monitor significant effects of implementing the Local Plan 3: Respond to adverse effects

THE IIA PROCESS TO DATE

- 2.4 A Scoping Report was prepared by Pro Vision Planning and Design in January 2016, during the evidence gathering and engagement stage of the Lewisham Gypsy and Traveller Site(s) Local Plan. The Scoping Report identified the content and the level of detail of the information to be included in this IIA. The Scoping Report described the background and context, set out the relevant plans, policies and programmes, and established the baseline. This information was used to identify the sustainability requirements, issues and trends in the London Borough of Lewisham and to develop the IIA framework. Natural England, the Environment Agency, Historic England and the Greater London Authority were consulted on the scope of the IIA. Comments were received from Natural England, the Environment Agency and Historic England. These comments have been considered in the preparation of this IIA Report.

THE IIA APPROACH

Lewisham Local Plan Regulation 18 Consultation

- 2.5 The policies in the draft Local Plan have been assessed to identify the likely significant effects of the alternative sites (Stage B). Forecasting and evaluation of the significant effects has helped to develop and refine the proposals in the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 2.6 Reasonable alternative sites were identified and considered at an early stage in the plan making process. The assessment of reasonable alternatives has informed the London Borough of Lewisham in choosing its preferred approach. Paragraph 152 of the National Planning Policy Framework was considered in the development of alternatives. Ways of mitigating any adverse effects, maximising beneficial effects and monitoring likely significant effects have been defined.
- 2.7 The IIA has compared the two preferred sites for delivering the 6 pitches that Lewisham needs, and has assessed these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted.

- 2.8 The IIA has predicted and evaluated the effects of the two preferred sites and has clearly identified the significant positive and negative effects of each alternative. The IIA has identified, described and evaluated the likely significant effects on environmental, economic and social factors using the evidence base. The determination of the likely significant effects on the environment is in line with the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.9 The IIA has identified any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The IIA has considered all reasonable alternatives and has assessed the two preferred sites in the same level of detail.
- 2.10 The IIA outlines the reasons the preferred sites were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. The IIA provides conclusions on the overall sustainability of the preferred sites. The assumptions used in assessing the significance of effects of the Local Plan are documented.
- 2.11 The development and appraisal of the proposals set out in the Lewisham Gypsy and Traveller Site(s) Local Plan is an iterative process. The proposals will be revised to take account of the appraisal findings. This will inform the selection, refinement and publication of the Local Plan.

Prepare the publication version of Lewisham Local Plan

- 2.12 Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the formal requirements of an 'environmental report', which forms an integral part of the IIA report and is a core output of the SEA. An environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing Lewisham Gypsy and Traveller Site(s) Local Plan policies and of the reasonable alternatives taking into account the objectives and geographical scope of the Lewisham Gypsy and Traveller Site(s) Local Plan.
- 2.13 This IIA report clearly shows how these requirements have been met, in addition to recording the wider assessment of social and economic effects. The IIA includes a non-technical summary of the information within the main report. The summary has been prepared with a range of readers in mind and provides a clear, accessible overview of the process and findings.

Seek representations on the publication Local Plan (regulation 19)

- 2.14 The consultation bodies, and other parties who are affected, or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the Lewisham Gypsy and Traveller Site(s) Local Plan will be consulted, in line with Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004. This IIA Report, including the non-technical summary, will be published alongside the Lewisham Gypsy and Traveller Site(s) Local Plan for a minimum of six weeks.
- 2.15 This IIA Report will not necessarily have to be amended if the Lewisham Gypsy and Traveller Site(s) Local Plan is modified following responses to consultation. Modifications to the IIA will be considered where appropriate and proportionate to the level of change being made to the Local Plan. A change is likely to be significant if it substantially alters the Local Plan and / or is likely to give rise to significant effects.
- 2.16 Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the IIA may also be required in such circumstances, but this will only be undertaken where necessary. Changes to the Local Plan that are not significant will not result in further IIA work.

Lewisham Local Plan Examination

- 2.17 This IIA Report will be submitted with the Lewisham Gypsy and Traveller Site(s) Local Plan to the Secretary of State for independent examination. This IIA Report will be examined as part of the evidence base for the Lewisham Gypsy and Traveller Site(s) Local Plan. The IIA Report will help integrate the different areas of evidence and will demonstrate why the site in the Local Plan is the most appropriate. If the necessary changes to the Local Plan resulting from

Examination are significant, and were not previously subject to IIA, then further IIA may be required and the IIA Report will be updated and amended accordingly.

Lewisham Local Plan Adoption and Monitoring

- 2.18 Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the relevant post-adoption requirements. The significant effects of implementing the Gypsy and Traveller Site(s) Local Plan will be monitored (as required by Regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004). This will enable the London Borough of Lewisham to identify unforeseen adverse effects at an early stage and enable appropriate remedial actions.
- 2.19 Details of monitoring arrangements will be included in the post-adoption statement. The monitoring results will be reported in the London Borough of Lewisham's Annual Monitoring Report.

STRATEGIC ENVIRONMENTAL ASSESSMENT

- 2.20 This IIA has, where appropriate, incorporated the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC). The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. The Directive has been transferred into UK law through the SEA Regulations (July 2004).
- 2.21 The SEA Directive focusses exclusively on environmental issues, whilst IIA also encompasses social and economic concerns. Government guidance on SA has been prepared to meet the requirements of the SEA Directive. Consistent with this approach, the IIA of the Gypsy and Traveller Sites Local Plan addresses the requirements of the SEA Directive.

Table 2.2 The requirements of the SEA Directive

SEA Directive Requirements	Where reported
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is: (Art. 5 and Annex I)	This IIA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Scoping Report January 2016, Section 3 and Appendix A of this report
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report January 2016, Section 3 and Appendix B of this report
c) The environmental characteristics of areas likely to be significantly affected;	Scoping Report January 2016, Section 3 and Appendix B of this report
d) Any existing environmental problems which are relevant to the plan programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report January 2016, Section 3 and Appendix B of this report

<p>e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;</p>	<p>Scoping Report January 2016, Section 3, Section 4 and Appendix A of this report</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p>Section 4 of this report</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>Section 5 of this report</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Sections 2 and 3 of this report</p>
<p>i) A description of measures envisaged concerning monitoring in accordance with Article 10;</p>	<p>Section 5 and Appendix C of this report</p>
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p> <p>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</p>	<p>N/A</p>

<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process</p>
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted;</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art. 9 and 10).</p>	<p>The Adoption Statement documents how environmental considerations have been integrated into the Lewisham Gypsy and Traveller Site(s) Local Plan</p> <p>Section 5 and Appendix C set out the proposed measures for monitoring</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	<p>Section 5 and Appendix C of this report</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This table identifies how the requirements of the SEA Directive have been met</p>

EQUALITIES ANALYSIS ASSESSMENT

- 2.22 Equalities Analysis Assessment (EAA) is the process of systematically analysing a proposed or existing policy to identify the likely affect from the implementation of the policy on different groups in the community. EAA seeks to ensure 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. Local Authorities have a duty to complete an EAA of relevant plans under the Equality Act 2010.
- 2.23 The IIA of the Lewisham Gypsy and Traveller(s) Sites Local Plan encompasses the requirements for EAA. The diverse needs of the Lewisham community have been considered during the production of the IIA. The methodology and the approach set out within the London Borough of Lewisham's EAA toolkit has been followed in the preparation of the IIA. The baseline analysis has included an assessment of data and research. Consultation on the IIA has met the requirements for consultation in relation to EAA. The impact assessment has included due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations. Proposed measures for monitoring and mitigation reflect the objectives of EAA.

LIMITATIONS AND ASSUMPTIONS

- 2.24 The data relates to the London Borough of Lewisham as a whole. The following gaps in available baseline data have been identified.
- Number of developments granted planning permission incorporating renewable energy solutions;

- Total energy used in the borough from renewable schemes;
- Number and location of healthcare facilities;
- New affordable housing as a percentage of all new housing;
- Tenure mix of affordable housing;
- Number of bedrooms in new dwellings;
- Planning applications obtaining new open space or public access linkages per year;
- Number of planning applications approved with waste management / recycling facilities incorporated; and
- Specific data covering public rights of way, cycle parking and lighting.

2.25 Gaps in baseline data will be addressed through the ongoing monitoring processes of the Council's Annual Monitoring Report.

3.0 Context, Baseline and Objectives

LONDON BOROUGH OF LEWISHAM LOCAL PLAN

3.1 The Local Plan represents a series of planning documents, which collectively outline planning strategy and policies for the London Borough of Lewisham. Local Plan documents can be procedural or policy based.

3.2 The following procedural documents have been approved or adopted by the London Borough of Lewisham:

- Local Development Scheme (LDS) – the LDS sets out an outline of the documents Lewisham propose to prepare and the timetable for the preparation of the various documents;
- Statement of Community Involvement (SCI) – the SCI aims to ensure that local communities know when, how and for what reason a consultation is to happen. The SCI sets out the type, extent and timing of consultation in relation to planning matters in the borough;
- Annual Monitoring Report (AMR) – the AMR sets out information on whether the Council is meeting, or on track to meet, the key dates for Local Plan preparation and whether the policies in the development plan are achieving what they set out to achieve.

3.3 Policy based documents and their status are described below:

- Lewisham Core Strategy (LCS) – the principal and overarching Local Plan document, adopted in June 2011;
- Lewisham Site Allocations Local Plan (LSALP) – identifies, designates and safeguards land for a particular use, adopted in June 2013;
- Lewisham Development Management Local Plan (LDMLP) – sets out additional planning policies to guide decisions on planning applications, adopted in November 2014;
- Lewisham Gypsy and Traveller Site(s) Local Plan (LGTSLP) – will allocate a site or sites to accommodate Gypsies and Travellers in the borough;
- Lewisham Town Centre Local Plan (LTCLP) – policies and proposals for development in Lewisham town centre, this was adopted on 26 February 2014;
- Supplementary Planning Documents (SPD's) – advice and guidance on policies and proposals contained in the development plan; and
- Neighbourhood Plans – the vision and policy for how local people would like their area to develop. None as yet, although 5 forums have been established and have expressed an interest in preparing a neighbourhood plan.

3.4 The Council is in the process of preparing a new integrated Local Plan which will eventually replace the existing Core Strategy, Site Allocations, Lewisham Town Centre and Development Management Local Plans.

LEWISHAM GYPSY AND TRAVELLER SITE(S) LOCAL PLAN

3.5 Given the pressing need to provide traveller accommodation, the Council is developing a standalone Gypsy and Traveller Site(s) Local Plan that will sit alongside the integrated Local Plan. The Lewisham Gypsy and Traveller Site(s) Local Plan is being prepared to allocate a site, or sites, to accommodate Gypsies and Travellers in the London Borough of Lewisham, as specified in adopted Core Strategy Policy 2: Gypsies and Travellers.

3.6 The Lewisham Gypsy and Traveller Accommodation Needs Assessment (LGTANA) (2015) found that the provision needed to 2030 in Lewisham is for six pitches. Since the publication of the GTANA (2015), the Government published its revised policy on planning for traveller sites

(2015). This includes a new definition of 'gypsy and travellers' for planning policy purposes. To ensure a robust assessment of need, the GTANA (2016) identifies a need for 6 pitches up to 2031.

- 3.7 The Local Plan will provide site and development information, and guidance for the allocated site or sites, expanding on the criteria set out in adopted Core Strategy Policy 2. Two preferred sites have been proposed as alternatives for delivering at least six pitches to provide for Lewisham's identified need.
- 3.8 The two preferred sites comprise New Cross Social Club and the adjoining land, and Land at Pool Court. New Cross Social Club is currently in use as a licensed bar and hall, with car parking. Land at Pool Court comprises two parcels of vacant open land and a scaffolding yard.
- 3.9 The chosen site is likely to be designed and developed to accommodate at least 6 pitches of varying sizes to meet the needs of those households that have the greatest housing need and are top of the Council's waiting list for pitches. Pitches are likely to include a hardstanding area for a static caravan, touring caravan and parking space. Pitches are also expected to include a single-storey amenity building and some landscaping/open space. It is hoped that there would also be an area of communal play/open meeting space on the site.

PLANS, POLICIES AND PROGRAMMES

- 3.10 This section summarises plans, policies, programmes and related sustainability objectives established at other levels of the planning system that are relevant to the IIA of the Lewisham Gypsy and Traveller Site(s) Local Plan. International, European, National, London wide and Lewisham based plans and strategies are considered where they are relevant.
- 3.11 Table 3.1 provides a list of those reviewed in the context of the Lewisham Gypsy and Traveller Site(s) Local Plan. Appendix A provides further detail, explaining the plans, policies and programmes relevance to the Lewisham Gypsy and Traveller Site(s) Local Plan and the IIA, and how they have been considered during the IIA process.

Table 3.1: Plans, Policies and Programmes

Plans, Policies and Programmes	
International	
	<ul style="list-style-type: none"> • The Johannesburg Declaration on Sustainable Development (2002) • The Kyoto Agreement (1997) • Convention concerning the Protection of the World Cultural and Natural Heritage (1972) (UNESCO) • Agenda 21 Declaration, UNCED Rio de Janeiro (1992) • Convention on Biological Diversity, Rio de Janeiro (1992)
European	
	<ul style="list-style-type: none"> • SEA Directive 2001/42/EC • European Sustainable Development Strategy (2001) (Reviewed in 2009) • European Spatial Declaration on Sustainable Development (1999) • European Spatial Development Perspective (1999) • European Directive 92/43/EEC (& 97/62/EC) on the conservation of natural habitats and of wild fauna and flora • European Directive on Conservation of Wild Birds 2009 (2009/147/EC) • European Directive 2002/49/EC (Noise)

- European Directive on Ambient Air Quality Assessment and Management (96/62/EC) and daughter directives
- European Directive 2000/60/EC (Water Framework Directive)
- EU Community Biodiversity Strategy 2012–2020
- EU Landfill Directive (99/31/EC)
- European Waste Framework Directive (2008/98/EC)
- Directive 2003/87/EC (establishing a scheme for greenhouse gas emission allowance trading)
- EU Seventh Environmental Action Plan 2013–2020

National

- National Planning Policy Framework (2012)
- National Policy on Planning for Traveller Sites (2015)
- National Planning Practice Guidance (2014)
- Environmental Assessment of Plans & Programmes Regulations (2004)
- The Housing and Planning Act (2016)
- Planning and Compulsory Purchase Act (2004)
- Town and Country Planning Act (1990)
- Housing Act (2004)
- Planning and Energy Act (2008)
- Climate Change Act (2008)
- The Equalities Act (2010)
- Noise Policy Statement for England (2010)
- UK Air Quality Strategy 'Working together for clean air' (Defra 2007)
- Energy White Paper 2003 'Our energy, our future, creating a low carbon economy'
- Environment Agency, Creating a better place strategy 2010–2015
- Thames Catchment Flood Management Plan and TE2100 Plan 2012
- Thames River Basin Management Plan (2009)
- Climate Change and the Historic Environment (English Heritage, 2007)
- Building in Context (English Heritage, CABE 2007)
- Seeing History in the View (English Heritage 2010, revised in 2012)
- Streets for All (English Heritage, 2006)
- Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (Historic England, 2013)
- UK Climate Change Risk Assessment : Government Report (Defra, 2012)
- National Adaption Programme – Making the country resilient to a changing climate (Defra, 2013)

- Working with Natural Processes to Manage Flood and Coastal Erosion Risk (EA, 2010)
- National Flood Emergency Framework for England (Defra, 2011)
- Greater working with Natural Processes to Manage Flood and Coastal Erosion Risk (EA, 2012)
- Our River Habitats – River Habitats in the Thames River Basin District: Current State and Character (EA, 2010)
- Designing Gypsy and Traveller Sites: Good Practice Guide (2008)
- Strategic Environmental Assessment and the Historic Environment (English Heritage)
- Gypsy and Traveller Accommodation Needs and Assessment: Guidance (2007)
- Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (2008)
- National Flood and Coast Erosion Management Strategy (July 2011)
- Civil Contingencies Act 2004
- Localism Act 2011
- Growth and Infrastructure Act 2013
- River Basin Management Plan 2015
- National Waste Plan and Prevention Programme
- The Water White Paper – Water for Life
- Environment Agency Classification of Water Stressed Areas
- Water Resource Management Plans
- Groundwater Protection: Principles and Practice
- Guiding Principles for Land Contamination
- Climate Change Adaptation Manual
- Catchment Abstraction Management Strategies
- Water Stress Classification
- Climate Change Information for each River Basin District
- Biodiversity Planning Toolkit

London

- The London Plan (March 2016)
- London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008)
- The Mayor's Air Quality Strategy (2010) and Progress Report July 2015
- The Mayor's Economic Development Strategy (2010)
- The Mayor's Biodiversity Action Plan 2010–2015
- The Mayor's Cultural Strategy (2014)
- The Mayor's Climate Change Adaptation Strategy (2011)
- The Mayor's Transport Strategy (2010)

- Mayor of London's Municipal Waste Management Strategy (2011)
- Mayor's Ambient Noise Strategy (2004)
- London Housing Strategy (2014)
- London Tree and Woodland Framework (2005)
- Revised London View Management Framework SPG (2010)
- The London Rivers Action Plan (2009)
- Mayor's Best Practice Guidance on Health Issues in Planning (2007)
- Mayor's Supplementary Guidance Sustainable Design and Construction (2014)
- Mayor's Supplementary Guidance Accessible London: Achieving an inclusive environment (2014)
- Mayor's Supplementary Guidance Providing for Children and Young People's Play and Informal Recreation (2012)
- Shaping Neighbourhoods: Character and Context (2014)
- London Planning Statement (2014)
- Housing in London (March 2016)
- All London Green Grid (2012)
- London's Foundations (2012)

Lewisham

- Lewisham Gypsy and Traveller Accommodation Needs Assessment (2015 and 2016)
- Lewisham Sustainable Community Strategy 2008-2028
- Lewisham Core Strategy (2011)
- Community Safety Strategy 2012-2017
- Safer Lewisham Plan 2013-2014
- Corporate Plan 2008-2011
- Lewisham Regeneration Strategy 2008-2020
- Lewisham Housing Strategy 2015 -2020
- Lewisham Municipal Waste Strategy
- Lewisham Children and Young People's Plan 2012-2015
- Lewisham Carbon Reduction and Climate Change Strategy (2008)
- Social Inclusion Strategy 2005-13
- Healthier Communities – A health and well-being framework for Lewisham (2007-2010)
- Lewisham Leisure and Open Space Study (2010)
- Local Biodiversity Action Plan – A Natural Renaissance For Lewisham 2006-2011
- Comprehensive Equalities Scheme 2016-2020
- Better futures: Lewisham's Homelessness Prevention Strategy 2009-2014

- Lewisham Borough Sports Plan 2010-13
- Lewisham Local Air Quality Action Plan (2008)
- Lewisham Strategic Flood Risk Assessment (2008)
- Lewisham Strategic Flood Risk Assessment Update (2015)
- Lewisham Flood Risk and Development Sequential Test (2009)
- Lewisham Local Implementation Plan (Transport) 2010) (LIP)
- Lewisham Strategic Housing Market Assessment 2008 and the South East London Sub-regional SHMA (2009)
- Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA) (2009)
- Lewisham Health and Wellbeing Strategy (2015)
- Lewisham Conservation Area Management Plans
- Lewisham Borough Wide Character Study (2010)
- Control of Pollution and Noise from Demolition and Construction Sites Code of Practice May (2008)
- Healthy Weight Healthy Lives (PCT with LB Lewisham) (2009)
- Creative Lewisham – Lewisham Cultural and Urban Development Commission 2009-2013
- Control of Pollution and Noise from Demolition Construction Sites Code of Practice May (2008)
- Healthy Weight Healthy Lives (PCT with LB Lewisham) (2009)
- Creative Lewisham – Lewisham Cultural and Urban Development Commission 2009-2013
- Control of Pollution and Noise from Demolition Construction Sites Code of Practice May (2008)
- Lewisham River Corridor Improvement Plan (2015)
- Lewisham Planning Obligations SPD (2015)
- Lewisham Bromley Road Supplementary Planning Document (2009)

CURRENT AND PREDICTED FUTURE SOCIAL, ECONOMIC AND ENVIRONMENTAL BASELINE CHARACTERISTICS

- 3.12 The baseline outlines the current and likely future state of the London Borough of Lewisham. The baseline provides the context for predicting and monitoring the impacts of the Lewisham Gypsy and Traveller Site(s) Local Plan. The baseline assessment supports the identification of the sustainability issues in the London Borough of Lewisham relevant to the Lewisham Gypsy and Traveller Site(s) Local Plan. The baseline information was reported in the Scoping Report January 2016. The updated relevant information is set out in Appendix B.
- 3.13 The baseline data and the policy context have been used to identify the relevant requirements, the current issues and the likely future trends in the London Borough of Lewisham. In some cases there are constraints which must be overcome, or impacts which must be avoided. In other cases the baseline presents opportunities.

- 3.14 The general sustainability issues for the Lewisham Gypsy and Traveller Site(s) Local Plan have been identified and are presented under broad themes in Table 3.2, below.

Table 3.2 Sustainability Requirements, Issues and Trends

Key issues	Source
Social Progress that meets the needs of Everyone	
<p>The population, including the Gypsy and Traveller population, is expected to rise. Lewisham must make provision for additional pitches to accommodate Gypsies and Travellers.</p> <p>The demand for affordable housing in Lewisham is very high.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Housing Act (2004)</p> <p>The London Plan (March 2016)</p> <p>London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008)</p> <p>London Housing Strategy (2010)</p> <p>Housing in London (2016)</p> <p>Lewisham Core Strategy (2011)</p> <p>Lewisham Housing Strategy 2015 -2020</p> <p>Lewisham Gypsy and Traveller Accommodation Needs Assessment (2015)</p>
<p>The health of the Gypsy and Traveller population is an essential consideration, including access to healthcare and opportunities for healthy lifestyles.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>The London Plan (March 2016)</p> <p>Healthier Communities – A health and well-being framework for Lewisham (2007-2010)</p>
<p>There are areas with high levels of poverty and social deprivation in the London Borough of Lewisham.</p>	<p>Mayor's Supplementary Guidance</p> <p>Accessible London: Achieving an inclusive environment</p> <p>Social Inclusion Strategy 2005-13</p>
<p>Gypsy and Traveller sites must be located where there is good access to leisure facilities, community infrastructure and key local services.</p> <p>The environment should encourage walking and cycling.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>The London Plan (March 2016)</p> <p>Lewisham Core Strategy (2011)</p>
<p>Crime, antisocial behavior and fear of crime are important considerations.</p> <p>A safe environment should be created, with high quality, people friendly spaces.</p> <p>Pedestrian movements, lighting and improvements to unsafe areas should be considered.</p>	<p>Lewisham Sustainable Community Strategy 2008-2020</p> <p>Community Safety Strategy 2008-2011</p> <p>Safer Lewisham Plan 2013-2014</p>

<p>Lewisham is the 15th most ethnically diverse local authority in England and 130 different languages are spoken.</p>	<p>Lewisham Regeneration Strategy 2008-2020</p>
<p>Effective protection of the Environment and prudent use of resources</p>	
<p>Gypsy and Traveller sites should be located in areas with good access to sustainable transport.</p> <p>Public transport needs to be made more appealing and car movements and car parking better managed.</p> <p>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> <p>There is a need to reduce pollution from transport, particularly private cars.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>The London Plan (March 2016)</p> <p>The Mayor's Transport Strategy (2010)</p> <p>Lewisham Core Strategy (2011)</p> <p>Lewisham Local Implementation Plan (Transport) (2010) (LIP)</p>
<p>Climatic change due to greenhouse gas emissions from fossil fuel use is likely to affect the natural environment.</p> <p>Viable decentralised renewable energy networks should be developed where applicable to supply energy to Gypsy and Traveller sites. There is a need to increase the proportion of energy used from renewable resources.</p> <p>Climate change may result in increased frequency of flooding. Damage to rural roads and overloading of sewers may become more commonplace.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Planning and Energy Act (2008)</p> <p>Climate Change Act (2008)</p> <p>Energy White Paper (2003)</p> <p>The London Plan (March 2016)</p> <p>London Climate Change Adaptation Strategy (2008)</p> <p>Lewisham Carbon Reduction and Climate Change Strategy (2008)</p> <p>Department for Energy and Climate Change</p>
<p>Water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance.</p> <p>The Air Quality Strategy objectives should be adhered to, particularly within the London Borough of Lewisham's five Air Quality Management Areas.</p> <p>The relationship between high noise sources and Gypsy and Traveller sites should be considered.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Noise Policy Statement for England (2010)</p> <p>UK Air Quality Strategy (DEFRA 2007)</p> <p>The London Plan (March 2016)</p> <p>The Mayor's Air Quality Strategy (2010)</p> <p>Mayor's Ambient Noise Strategy</p> <p>Thames Water Resources Management Plan</p> <p>Lewisham Local Air Quality Action Plan (2008)</p> <p>Lewisham Assessment of Air Quality (2009)</p> <p>Lewisham Strategic Flood Risk Assessment (2008)</p>

<p>Gypsy and Traveller sites should be provided at locations with good access to open space. The adequacy and quality of open space should be considered.</p> <p>The provision of Gypsy and Traveller sites should be balanced with the protection of designated nature conservation sites, biodiversity, flora and fauna.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>The London Plan (March 2016)</p> <p>The Mayor's Biodiversity Action Plan 2010-2015</p> <p>Lewisham Core Strategy (2011)</p> <p>Local Biodiversity Action Plan – A Natural Renaissance For Lewisham 2006-2011</p> <p>Lewisham Leisure and Open Space Study (2010)</p>
<p>Gypsy and Traveller sites should be allocated avoiding areas at risk of flooding.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Thames Catchment Flood Management Plan</p> <p>Thames River Basin Management Plan (2009)</p> <p>The London Plan (March 2016)</p>
<p>There are areas of Lewisham which require an improved image, in terms of design and the built form.</p> <p>The design of the natural environment requires consideration in terms of open space.</p> <p>Spaces and places need to be of high design quality, respecting historical features and promoting local distinctiveness, providing access for all.</p> <p>There is a need to address linkages between design and achieving objectives for the delivery of Gypsy and Traveller sites.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>Designing Gypsy and Traveller Sites: Good Practice Guide (2008)</p> <p>The London Plan (March 2016)</p> <p>Mayor's Supplementary Guidance Sustainable Design and Construction (2014)</p> <p>Lewisham Core Strategy (2011)</p>
<p>The provision of Gypsy and Traveller sites should be balanced with the need to protect Listed Buildings, Conservation Areas and other heritage assets, respecting the architectural identity and character of the Borough.</p>	<p>National Planning Policy Framework (2012)</p> <p>National Policy on Planning for Traveller Sites (2015)</p> <p>English Heritage documents</p> <p>The London Plan (March 2016)</p> <p>London's Foundations (2012)</p> <p>Lewisham Core Strategy (2011)</p>
<p>Waste generation should be reduced and recycling rates should be improved.</p>	<p>Mayor of London's Municipal Waste Management Strategy (2008)</p> <p>Lewisham Municipal Waste Strategy</p>

Maintenance of high and stable levels of economic growth	
Sustained economic growth is essential as Lewisham's underlying economy is one of the smallest in London. The provision of Gypsy and Traveller sites should be balanced with the provision of employment land, particularly for small and medium size enterprises.	National Planning Policy Framework (2012) National Policy on Planning for Traveller Sites (2015) The London Plan (March 2016) The Mayor's Economic Development Strategy (2010) Lewisham Core Strategy (2011)
Access to education, skills and training is vital, as 25% of the population of Lewisham has no qualifications. A linkage with apprentice schemes needs to be considered.	The Mayor's Economic Development Strategy (2010)
Gypsy and Traveller sites should be provided at locations with good access to employment.	National Planning Policy Framework (2012) National Policy on Planning for Traveller Sites (2015) The London Plan (March 2016) The Mayor's Economic Development Strategy (2010) Lewisham Core Strategy (2011)

SUSTAINABILITY OBJECTIVES, TARGETS AND INDICATORS

- 3.15 The sustainability objectives provide a method for describing, analysing and comparing the sustainability effects of the Lewisham Gypsy and Traveller Site(s) Local Plan. A series of sustainability objectives were developed at the scoping stage, taking into account the relationship between the Lewisham Gypsy and Traveller Site(s) Local Plan and the objectives of other plans and programmes, along with the findings of the baseline information review. The sustainability objectives were developed and consulted on as part of the scoping process. These objectives have been refined to reflect the changing sustainability concerns in the borough.
- 3.16 The objectives are supported by specific, measurable, achievable, realistic and time related (SMART) indicators. The objectives and indicators facilitate the comparison of options, the prediction and assessment of impacts and monitoring. The IIA framework focusses on areas where significant effects are likely. The sustainability objectives and indicators are presented in Table 3.3 below.

Table 3.3: IIA objectives and indicators

IIA Objective	Indicator
Social	
1. To provide sufficient housing and the opportunity to live in a decent home	Number of housing completions Gypsy and Traveller pitches Number of affordable housing completions (by tenure type) Mix of housing tenure Mix in dwelling sizes

	Provision of student/other specialist housing
2. To improve the health of the population	Households with limiting long-term illness Mortality rate from circulatory diseases at age under 75 Mortality rate from all cancers at age 75 of under Health life expectancy at age 65 Number of people taking part in activities that improve physical and mental health in the borough
3. To reduce poverty and social exclusion	Number of recorded racial incidents Indices of Multiple Deprivation
4. To improve accessibility to leisure facilities, community infrastructure and key local services	Gain/loss of community/recreational facilities Delivery of identified social infrastructure Funding for community facility improvements secured
5. To reduce crime, antisocial behavior and the fear of crime	Number of schemes incorporating 'secured by design' Number of offences per 1,000 population Detailed indicators for the following: <ul style="list-style-type: none"> • Violence against the person • Burglaries • Robberies • Violent crime • Sexual offences
Environmental	
6. To reduce car travel and improve accessibility by sustainable modes of transport	Number of car parking spaces delivered in new development Number of completed car limited developments Number of car clubs and parking bays % of permitted major developments with a travel plan Proportion of journeys made on foot and by bicycle Number of electric car charging points Improvements to legibility and signage Improved pedestrian and cycle routes and crossings

	<p>Number of cycle parking spaces provided for each new home or other development and public realm</p> <p>Improved lighting and natural surveillance on pedestrian and cycle paths</p> <p>Number of road accident casualties per 1,000 population serious or fatal</p> <p>Public transport accessibility levels</p>
7. To mitigate and adapt to the impact of climate change	<p>Number of homes achieving Code for Sustainable Homes level 4 or above granted/completed</p> <p>Number of BREEAM buildings granted/completed</p> <p>Number and capacity of decentralised energy granted/completed</p> <p>Number, type and capacity of renewable energy granted/completed</p> <p>Number and size of living roofs granted/completed</p> <p>Number of new developments incorporating water efficiency measures</p>
8. To improve air quality and water quality, manage water resources and reduce noise and vibration	<p>Water pollution incidents</p> <p>Change in chemical river quality</p> <p>Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</p> <p>LLSOA Electricity and Gas consumption</p> <p>Per capita reductions in CO2</p> <p>Levels exceeding Main Air Pollutant Quality Standards</p> <p>Levels of NO2 and PM10</p> <p>Number of complaints related to noise from roads, construction, maintenance, noisy neighbours and/or other.</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p>
9. To increase, maintain and enhance open space, biodiversity, flora and fauna	<p>Area of designated habitats</p> <p>Number and size of biodiverse brown living roofs granted/completed</p> <p>Number of bat and other bird boxes delivered as part of new developments</p> <p>Number of applications granted or refused on designated open space and within SINCS</p>

	<p>Amount of new or improved open space provided, including that which provides a net gain for biodiversity and accessible natural greenspace</p> <p>Number of new allotments and community gardens</p> <p>Funding secured for open space improvements</p>
10. To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defense grounds or water quality</p> <p>Number of SUDS granted and delivered</p> <p>Flooding incidents</p>
11. To maintain and enhance landscapes and townscapes	<p>Number of key views maintained and enhanced</p> <p>Pre applications and applications considered by the design review panel</p> <p>Number of interventions aimed at improving streetscapes</p>
12. To conserve and where appropriate enhance the historic environment	<p>Number of designated heritage assets (including listed buildings and conservation areas)</p> <p>Number of undesignated heritage assets (locally listed buildings, areas of archaeological significance)</p> <p>% of applications where archaeological strategies were developed and implemented</p> <p>Number of applications that have considered views of strategic importance</p> <p>Condition of designated and undesignated heritage assets</p>
13. To minimise the production of waste and increase waste recovery and recycling	<p>% of waste recycled, reused or composted</p> <p>Tonnes of waste sent to landfill per year</p> <p>Residual household waste per year</p> <p>Amount of waste recycled on site by residents and employment industries</p>
14. To reduce land contamination and safeguard soil quality and quantity	<p>Number of planning applications with the potential for land contamination</p>
Economic	
15. To encourage sustained economic growth	<p>Area of employment land with mixed use employment location (MEL) and local employment location (LEL)</p> <p>Size and type of employment floorspace</p> <p>Amount of vacant employment floorspace</p>

	<p>Amount of new completed employment floor space</p> <p>New business registration rate</p> <p>Rent levels of employment accommodation</p>
<p>16. To promote access to employment, education, skills and training</p>	<p>Employee numbers in Lewisham</p> <p>% of businesses in the area showing employment growth</p> <p>Job density in Lewisham</p> <p>Number of employed and unemployed living in the area</p> <p>Numbers of employees and business owners who are BME</p> <p>% of population of working age who claim unemployment benefit</p> <p>Number of pupils achieving 5 or more GCSE's at grades A* to C or equivalent</p> <p>People aged 16-74 with no qualifications</p> <p>Number of full and part time courses provided</p> <p>Number of full and part time people participating in educational courses/events in the area</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p>

4.0 Integrated Impact Assessment

CORE STRATEGY POLICY 2

- 4.1 The IIA and SEA of the London Borough of Lewisham's Core Strategy included an assessment of Core Strategy Policy 2. The allocation of sites for Gypsies and Travellers was deemed to have a positive sustainability impact on meeting housing need. Impacts dependent on implementation include access to public transport and facilities, respecting the amenity of neighbouring properties and protecting existing habitats and biodiversity.

ASSESSMENT OF SUITABLE ALTERNATIVES

- 4.2 Sustainability criteria relating to access to facilities and services, access to the road network, land use, health and environmental quality informed the identification of the preferred sites from the following list of potential sites. Land ownership, planning considerations and deliverability also informed the site selection process.
- A – Land off Westbourne Drive SE23;
 - B – Land off Turnham Road SE4;
 - C – New Cross Social Club and adjoining land, Hornshay Street SE15;
 - D – Land at rear of 46 – 116 Baizdon Road SE23;
 - E – Land at Pool Court SE6;
 - F – Land at St Mildred's Road, Hither Green SE12.

SUSTAINABILITY APPRAISAL

- 4.3 It is important that the Lewisham Gypsy and Traveller Site(s) Local Plan is in accordance with sustainability principles. The preferred sites, C – New Cross Social Club and adjoining land, and E – Pool Court, have been assessed in accordance with the SEA Directive and related UK regulations. The likely significant effects on the environment of implementing the Lewisham Gypsy and Traveller Site(s) Local Plan are identified, evaluated and described in Tables 4.2 and 4.3. An evidence based approach has been adopted to:
- Identify changes to the baseline which are predicted to arise from the implementation of the Lewisham Gypsy and Traveller Site(s) Local Plan;
 - Describe the 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 arising and any secondary, cumulative and / or synergistic effects.
- 4.4 The assessment incorporates EAA. The Lewisham Gypsy and Traveller Site(s) Local Plan has been systematically analysed to identify the effect, or likely effect, of implementation for different groups in the community. The assessment seeks to ensure 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.
- 4.5 Evidence based predictions and evaluations are both qualitative and quantitative. The preferred sites have been assessed in terms of their impact against the sustainability objectives, to assist in refining the Lewisham Gypsy and Traveller Site(s) Local Plan. The following symbols have been used to assess overall whether the contribution that each site makes in relation to each of the sustainability objectives is positive, negative, neutral or uncertain. The assessments are set out in Tables 4.2 and 4.3.

Table 4.1: Assessment symbols

Symbol	Contribution
	Significant positive
	Positive
0	Neutral
x	Negative
xx	Significant negative
?	Unknown

NEW CROSS SOCIAL CLUB AND ADJOINING LAND

Table 4.2: Integrated Impact Assessment

IIA Objective	Integrated Impact Assessment	Comments
Social		
1. To provide sufficient housing and the opportunity to live in a decent home		The site has capacity to accommodate the 6 pitches required in the borough up to 2031.
2. To improve the health of the population	x	The loss of the MUGA could have a detrimental effect on health.
3. To reduce poverty and social exclusion	x	The loss of the hall used for community events could have a local negative effect on social exclusion.
4. To improve accessibility to leisure facilities, community infrastructure and key local services	x	The loss of the hall used for community events could have a local negative effect on community infrastructure.
5. To reduce crime, antisocial behavior and the fear of crime	?	The effects on crime, antisocial behavior and fear of crime will be dependent on policy implementation.
Environmental		
6. To reduce car travel and improve accessibility by sustainable modes of transport		The site has convenient access to bus services and the railway network.
7. To mitigate and adapt to the impact of climate change	0	The preferred site will have a neutral effect on climate change.
8. To improve air quality and water quality, manage water resources and reduce noise and vibration	0	The preferred site will not have a significant effect on air, water or noise.

9. To increase, maintain and enhance open space, biodiversity, flora and fauna		The proposed tree planting along the boundary with Hornshay Street will enhance biodiversity and flora.
10. To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network	?	The preferred site is within an area at risk from flooding identified by the Environment Agency (Flood Risk Zone 3a – high fluvial flood risk identified). However, based on the presence of existing defenses the actual risk to property is considered low. There is moderate to high surface water flood risk on parts of the site.
11. To maintain and enhance landscapes and townscapes		The demolition of the existing buildings and tree planting along Hornshay Road would have a positive effect on the townscape in the medium to long term.
12. To conserve and where appropriate enhance the historic environment	0	The preferred site would have a neutral effect on the historic environment.
13. To minimise the production of waste and increase waste recovery and recycling	?	Effects on the production of waste and increased waste recovery and recycling will be dependent on implementation of the policy.
14. To reduce land contamination and safeguard soil quality and quantity	0	The preferred site would have a neutral effect on land contamination
Economic		
15. To encourage sustained economic growth		The future residents could make a contribution to the local labour market.
16. To promote access to employment, education, skills and training		The site has convenient access to local employment and education.

LAND AT POOL COURT

Table 4.3: Integrated Impact Assessment

IIA Objective	Integrated Impact Assessment	Comments
Social		
1. To provide sufficient housing and the opportunity to live in a decent home		The site has capacity to accommodate the 6 pitches required in the borough up to 2031.
2. To improve the health of the population	0	The preferred site will not have a significant effect on the health of the population.
3. To reduce poverty and social exclusion	0	The preferred site will have a neutral effect on poverty and social exclusion.
4. To improve accessibility to leisure facilities, community infrastructure and key local services		The site has convenient access to local facilities and services.
5. To reduce crime, antisocial behavior and the fear of crime	?	The effects on crime, antisocial behavior and fear of crime will be dependent on policy implementation.
Environmental		
6. To reduce car travel and improve accessibility by sustainable modes of transport		The site has convenient access to bus services and the railway network.
7. To mitigate and adapt to the impact of climate change	0	The preferred site will have a neutral effect on climate change.
8. To improve air quality and water quality, manage water resources and reduce noise and vibration	0	The preferred site will not have a significant effect on air, water or noise.
9. To increase, maintain and enhance open space, biodiversity, flora and fauna	x	The loss of open land could have a local adverse effect on biodiversity, flora and fauna.
10. To mitigate and reduce flood risk, improve water quality, manage water resources and restore and enhance the river network	?	The preferred site is within an area at risk from flooding identified by the Environment Agency (part in Flood Zone 2, part in Flood Zone 3a). There is a medium risk of fluvial flooding, with a high risk of surface water flooding due to topography, and moderate groundwater risk.

		There is a reasonable prospect of the sequential and exceptions tests being met.
11. To maintain and enhance landscapes and townscapes	x	The loss of open land, particularly the area to the north west of Pool Court, could have a local negative landscape effect.
12. To conserve and where appropriate enhance the historic environment	0	The preferred site would have a neutral effect on the historic environment.
13. To minimise the production of waste and increase waste recovery and recycling	?	Effects on the production of waste and increased waste recovery and recycling will be dependent on implementation of the policy.
14. To reduce land contamination and safeguard soil quality and quantity	0	The preferred site would have a neutral effect on land contamination
Economic		
15. To encourage sustained economic growth		The future residents could make a contribution to the local labour market.
16. To promote access to employment, education, skills and training		The site has convenient access to local employment and education.

5.0 Mitigation and Monitoring

MITIGATION

- 5.1 The site specific development guidelines set out within the Lewisham Gypsy and Traveller Site(s) Local Plan provide appropriate mitigation measures associated with the implementation of the document. Further requirements for mitigation may be identified through the monitoring process. Mitigation measures should follow the hierarchy set out in Table 5.1.

Table 5.1: Mitigation hierarchy

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

MONITORING

- 5.2 The indicators relating to each sustainability objective are set out in Table 3.3. Appendix C sets out the targets, monitoring frequency, data sources and actions relating to each indicator. Monitoring will be completed by the London Borough of Lewisham and presented within the Annual Monitoring Report.

Appendices

Appendix A

Plans, Policies and Programmes

Plans, Policies and Programmes	Relevant objectives	Implications for the Gypsy and Traveller Sites Local Plan and IIA
International – All info apart from the National Section is taken from the 2005 Scoping Report		
The Johannesburg Declaration on Sustainable Development 2002	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	The definition of sustainable development 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'.
The Kyoto Agreement 1997	The key aim is to limit and/or reduce the emissions of greenhouse gases.	Reducing greenhouse gas emissions.
Convention concerning the Protection of the World Cultural and Natural Heritage 1972 (UNESCO)	Article 5 – To ensure that effective and active measures are taken for the protection, conservation and presentation of cultural and natural heritage and to adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes.	The protection of Lewisham's cultural and natural heritage.
Agenda 21 Declaration Rio de Janeiro 1992	Committed countries to the principles of sustainable development. The Convention came into force on 29 December 1993. It has three main objectives: <ul style="list-style-type: none"> • Conserve biological diversity; • Sustainable use of biological diversity; • Fair and equitable sharing of the benefits of biological diversity. 	The integration and balancing of economic, environmental and social objectives. Ensure the protection and enhancement of the area's biodiversity.
Convention on Biological Diversity, Rio de Janeiro 1992	The Convention outlines three main goals for the conservation, protection and enhancement of biological diversity; the conservation of biological diversity, its sustainable use, and the equitable sharing of benefits associated with genetic resources. National strategies and action plans must be implemented by Contracting Parties to achieve these goals.	Minimise impacts on biodiversity. View ecosystems holistically, rather than focussing on islands of protected species.
European		
SEA Directive 2001/42/EC	Requires an assessment of the effects of certain plans and programmes on the environment and prescribes the environmental issues to assess.	Ensure key environmental issues are assessed and considered.

<p>European Sustainable Development Strategy 2001 (Reviewed in 2009)</p>	<p>Environmental objectives and priorities derived from the EU Sixth Environmental Action Programme focus on:</p> <ul style="list-style-type: none"> • limiting climate change and increasing the use of clean energy; • addressing threats to public health (e.g. hazardous chemicals, food safety); • combating poverty and exclusion; • dealing with the economic and social implications of an ageing society; • managing natural resources more responsibly (including biodiversity and waste generation); • improving the transport system and land use management. 	<p>The integration and balancing of economic, environmental and social objectives.</p>
<p>European Spatial Declaration on Sustainable Development, EU 1999</p>	<p>The aim is to work towards a balanced and sustainable development of the territory of the European Union.</p>	<p>The integration and balancing of economic, environmental and social objectives.</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>Economic and social cohesion, protecting and enhancing historic and cultural heritage, and reducing greenhouse gas emissions.</p>
<p>European Directive 92/43/EEC (& 97/62/EC) on the conservation of natural habitats and of wild fauna and flora</p>	<p>Promote the maintenance of biodiversity by requiring member states to introduce robust protection measures to maintain or restore natural habitats and wild species.</p>	<p>Minimise the impact on natural habitats.</p>
<p>European Directive on Conservation of Wild Birds 2009 (2009/147/EC)</p>	<p>The maintenance of the favourable conservation status of all wild bird species across their distributional range.</p>	<p>Preserve habitats for birds.</p>

European Directive 2002/49/EC (Noise)	The Environmental Noise Directive aims to “define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to the exposure to environmental noise”. It aims at providing a basis for developing EU measures to reduce noise emitted by major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.	Mitigation of adverse impacts on health and well-being from temporary and permanent noise nuisance.
European Directive on Ambient Air Quality Assessment and Management (96/62/EC) and daughter directives	The Directives aim to reduce specified air pollutants. Limits have been translated into UK law in Air Quality Regulations.	Monitor progress in relation to air quality.
European Directive 2000/60/EC (Water Framework Directive)	To establish a framework to address pollution of waterways from urban wastewater and agriculture and to improve Europe’s waterways. Target: Member States to produce River Basin Management Plans by 2009 and to achieve the environmental objectives of the Plans by 2016.	Protection of ground and surface water from incidental, as well as accidental pollution.
EU Community Biodiversity Strategy 2012-2020	Seeks the conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).	Protection and enhancement of biodiversity.
EU Landfill Directive (99/31/EC)	To prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, ground water, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the land-filling of waste, during the whole life-cycle of the landfill.	Minimise waste generation and maximise sustainable waste management.
European Waste Framework Directive (2008/98/EC)	The Directive seeks to reduce the quantity of waste going to landfill and introduces the waste hierarchy of prevention, reuse, recycle, recovery, and disposal.	Reduce the amount of waste requiring final disposal. Monitor the proportion of waste reduced/recycled/recovered.
Directive 2003/87/EC (establishing a scheme for greenhouse gas emission allowance trading)	Introduces a European wide emissions trading scheme.	Reduce greenhouse gas emissions and overall carbon footprint. Reflect carbon reduction targets.

EU Seventh Environmental Action Plan 2013 - 2020	Seeks a high level of protection of the environment and human health and for general improvements in the environment and quality of life.	Protect and enhance overall environmental quality.
National		
National Planning Policy Framework 2012	The National Planning Policy Framework includes a presumption in favour of sustainable development and sets out the social, economic and environmental roles of the planning system.	A presumption in favour of sustainable development, considering the social, economic and environmental roles of the planning system.
National Policy on Planning for Traveller Sites (2015)	Sets out the Government's planning policy for traveller sites. The government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of live of travellers while respecting the interests of the settled community.	<p>The Government's aims in respect of traveller sites are:</p> <ul style="list-style-type: none"> a) that local planning authorities should make their own assessment of need for the purposes of planning. b) To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. c) To encourage local planning authorities to plan for sites over a reasonable timescale. d) That plan-making and decision-taking should protect Green Belt from inappropriate development. e) To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. f) That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective. g) For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies. h) To increase the number of traveller sites in appropriate locations with planning

		<p>permission, to address under provision and maintain an appropriate level of supply.</p> <ul style="list-style-type: none"> i) To reduce tensions between settled and traveller communities in plan-making and planning decisions. j) To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. k) For local planning authorities to have due regard to the protection of local amenity and local environment.
Environmental Assessment of Plans & Programmes Regulations 2004	Transposes the SEA directive into UK law.	Reflect the regulations and associated guidance note.
Planning and Compulsory Purchase Act 2004	The Act provides the statutory planning framework for England.	Comply with legislation.
Town and Country Planning Act 1990	Sets out the procedures for the preparation, approval and adoption of Local Plans.	Comply with legislation.
Housing Act 2004	Requires Local Planning Authorities to complete an accommodation assessment and consider how to meet Gypsy and Traveller accommodation needs as part of their housing and planning requirements.	Comply with legislation.
Planning and Energy Act 2008	An Act to enable Local Planning Authorities to set requirements for energy use and energy efficiency in Local Plans.	Energy efficiency to reduce greenhouse gas emissions.
Climate Change Act 2008	The Act creates a new approach to managing and responding to climate change in the UK.	Consideration of impacts on Climate Change.
Noise Policy Statement for England 2010	The Noise Policy Statement for England aims to provide the necessary clarity and direction to enable decisions to be made regarding what is an acceptable noise burden to place on society.	<p>Avoid noise impacts.</p> <p>Mitigation of adverse impacts on health and well-being from noise.</p>

	To avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; and where possible, contribute to their improvement.	
UK Air Quality Strategy 'Working together for clean air' (2007)	Everyone can enjoy a level of ambient air quality in public places which poses no significant risk to health or quality of life.	Improve Air Quality. Encourage reduction or mitigation of air polluting land uses.
Energy White Paper 2003: Our energy, our future, creating a low carbon economy	The Strategy seeks to: <ul style="list-style-type: none"> • Reduce waste by making products with fewer natural resources; • Break the link between economic growth and waste growth; • Most products should be used or their materials recycled; • Recover energy from other wastes. 	Waste hierarchy – reduce, reuse, recycle.
Environment Agency, Creating a better place strategy 2010-2015	The strategy shows how the EA will work in specific areas to achieve its aims relating to biodiversity, climate change, flood risk, creating sustainable places and waste management.	Biodiversity, climate change, flood risk, and waste management.
Thames Catchment Flood Management Plan	Provides an overview of flood risk in the Thames catchment and sets out the EAs preferred plan for sustainable flood risk management over the next 50 to 100 years.	Manage flood risk.
TE2100 Plan November 2012	Provides an overview of flood risk in the Thames catchment and sets out the EAs preferred plan for sustainable flood risk management over the next 50 to 100 years.	Manage flood risk.
Thames River Basin Management Plan 2009	Pressures facing the water environment in this river basin district, and the actions that will address them.	Protection of water quality.
Climate Change and the Historic Environment (English Heritage, 2007)	Provides an overview of climate change impacts on the historic environment and of the impacts associated with responses to climate change.	Impacts on heritage assets and the wider historic environment.
Building in Context (English Heritage, CABE 2007)	Provides case-study examples of how new development can respond well to historic character in terms of design.	Impacts on heritage assets and the wider historic environment.

Seeing History in the View (English Heritage 2010, revised in 2012)	Explains how the heritage significance of views can be assessed in a systematic and consistent way however these views have come into being.	Impacts on heritage assets and the wider historic environment.
Streets for All (English Heritage, 2006)	Shows how public realm upgrades can be designed to be appropriate to and enhance the historic environment.	Impacts on heritage assets and the wider historic environment.
Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (Historic England, 2013)	Guidance focuses on SEA/SA for development plans. Committed to the principles of sustainable development.	Impacts on heritage assets and the wider historic environment.
National Flood Emergency Framework for England (Defra, 2011)	Provides a framework to follow in a flooding emergency.	Design of Gypsy and Traveller sites.
Gypsy and Traveller Accommodation Needs and Assessment: Guidance 2007	Guidance which aims to provide advice on carrying out an assessment of accommodation needs of Gypsies and Travellers.	Needs of Gypsies and Travellers.
Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers 2008	Guidance towards all aspects associated with Gypsy/Traveller developments.	Responsibilities associated with Gypsies and Travellers.
National Flood and Coast Erosion Management Strategy (July 2011)	<p>Objective</p> <ul style="list-style-type: none"> • ensure a clear understanding of the risks of flooding and coastal erosion • set out clear and consistent plans for risk management • manage flood and coastal erosion risks in an appropriate way • ensure that emergency plans and responses to flood incidents are effective • help communities to recover more quickly and effectively after incidents. <p>Aim</p> <ul style="list-style-type: none"> • put in place long-term plans to manage risks ensuring other plans take account of them • avoiding inappropriate development in areas of flood and coastal erosion risk 	Impacts on Environment.
Civil Contingencies Act 2004 (CCA)	This legislation aims to provide a single framework for civil protection.	Impacts on Environment.

	<p>The Act, and accompanying non-legislative measures, delivers a single framework for civil protection in the country. The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office's initiative to develop wider community resilience to threats and hazards.</p>	
Localism Act	<p>Planning and regeneration provisions will provide for neighbourhood development orders to allow communities to approve development without requiring normal planning consent. Local authorities, the Environment Agency and other prescribed bodies are obliged to work together on certain strategic matters under the 'duty to cooperate' in the Localism Act in England. In particular, these organisations should cooperate across boundaries because flood risk often requires wider than local consideration.</p> <p>The Localism Act also requires lead local flood authorities (LLFAs) to make arrangements for overview and scrutiny committees to review and scrutinise risk management authorities. Risk management authorities are now under a duty to comply with a request made by an overview and scrutiny committee for information or a response to a report in relation to its flood or coastal erosion risk management functions.</p>	Impacts on Environment.
Growth and Infrastructure Act 2013 (April 2013)	<p>The Act:</p> <p>Allows the modification or discharge of the affordable housing elements of section 106 planning gain agreements in order to make developments more viable.</p>	Impacts on Environment.

	<p>Contains the controversial measures to extend permitted development rights to allow single-storey extensions of up to eight metres.</p> <p>Introduces measures to allow developers to take planning applications to the Planning Inspectorate where a council has "consistently failed to meet statutory requirements to consider applications on time".</p>	
River Basin Management Plan 2015	This provides an important baseline not only for the status of the river water bodies mentioned in the IIA but also the groundwater bodies that were not mentioned in the IIA.	Impacts on Environment.
National Waste Plan and Waste Prevention Programme	This plan provides an analysis on waste management in England, bringing current and planned waste management policies together in one place.	Impacts on Environment.
The Water White Paper – Water for Life	The Water White Paper focuses on the challenges facing the water sector, including maintaining water supplies, keeping bills affordable and reducing regulation. It recognises the need to protect rivers, streams and lakes from pollution and unsustainable abstraction, and acknowledges the critical importance of water supply and sewerage infrastructure.	Impacts on Environment.
Groundwater Protection: Principles and Practice (GP3)	The GP3 document is a key Environment Agency reference for LPAs, developers and land owners. It is an important accompaniment to the River Basin Management Plan as it explains the relevance of Source Protection Zones and how these contribute to achieving good status under the Water Framework Directive.	Impacts on Environment.

Catchment Abstraction Management Strategies, (CAMS) EA	CAMS provide current water availability for abstraction on a catchment by catchment basis, ensuring we safeguard water resources despite increasing pressures on water availability due to population growth and climate change.	Impacts on Environment.
Equalities Act 2010	Includes the requirement to protect the rights of individuals and to advance equality of opportunity for all.	Impacts on Equalities.
Housing and Planning Act 2015	Includes the requirement for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.	Impacts on meeting housing need.
London		
The London Plan (March 2016)	Strategic policies for spatial planning and development across London to ensure the city develops in a sustainable manner.	General conformity with the London Plan.
London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008)	Responds to the requirement placed on Local Authorities under the Housing Act 2004	Comply with legislation
The Mayor's Air Quality Strategy 2010 and Progress Report July 2015	Concentrates on policies to promote healthy living and sets out measures to tackle London's air quality problem.	Improve air quality.
The Mayor's Economic Development Strategy 2010	Sets out to encourage the expansion of opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life.	Encourage sustainable economic growth.
The City of London's Biodiversity Action Plan 2010-2015	Sets policies and proposals to protect and care for London's biodiversity by encouraging the greening of the built environment and the use of open spaces in ecologically sensitive ways.	Protect and enhance biodiversity.
The Mayor's Cultural Strategy 2014	Sets out the Mayor's proposals for developing and promoting cultural life in London.	Ensure the enhancement of cultural and social growth.
London Climate Change Adaptation Strategy 2008	Presents adaptation measures to address climate change within London.	Reducing the impacts and adapting to the effects of climate change.

The Mayors Climate Change and Adaptation Strategy 2011	Sets out a framework for enhancing quality of life in London and protecting the environment.	Reduce the impact and adapt to the effects of climate change.
The Mayor's Transport Strategy 2010	Details priority areas for transport that directly or indirectly benefit the environment and the London community.	Reduce the need for car travel and encourage sustainable modes of transport.
Mayor of London's Municipal Waste Management Strategy 2011	Reduce London's waste generation by 2020 and sustainably manage the waste created.	Reduce waste generation.
Mayor's Ambient Noise Strategy 2004	Minimise the adverse impacts of noise on people living, working and visiting London, using the best available practises and technology.	Mitigation or avoidance of noise impacts.
The Mayor's Housing Strategy 2014	Raise aspirations and promote opportunity: by producing affordable homes, particularly for families, and by increasing opportunities for home ownership; Improve homes and transform neighbourhoods: by improving design quality, by greening homes, by promoting successful, strong and mixed communities and by tackling empty homes.	Quality and affordability of housing supply.
London Tree and Woodland Framework	Plant the right trees in the right places to enhance the environment and quality of life.	Protect and enhance trees.
Revised London View Management Framework SPG 2012	New development needs to comply with appropriate viewing corridors that are located both within and across the borough.	Maintain and enhance the quality of the townscape.
The London Rivers Action Plan	Restoration of rivers and implementation of London Plan Blue Ribbon policies.	River restoration, access to rivers, acknowledgement of the positive role rivers and river restoration play in biodiversity, climate change and flood risk management.
Mayor's Best Practice Guidance on Health Issues in Planning (2007)	BPG promotes the Mayor's statutory duty to promote the health of Londoners. The guide helps boroughs tackle health inequalities and promote healthy developments. Helps Local Authorities to meet their obligations to promote wellbeing in their boroughs.	Appraise health and seek to reduce health inequalities.
Mayor's Supplementary Guidance Sustainable Design and Construction 2014	The SPG seeks to ensure future developments meet the highest standards of sustainable design and construction.	The sustainable use of natural resources and reduced impact of climate change through energy efficient design and construction.

Mayor's Supplementary Guidance Accessible London: Achieving an inclusive environment 2014	The SPG seeks to ensure the promotion of an inclusive accessible environment	Accessibility for all and inclusivity.
Mayor's Supplementary Guidance Providing for Children and Young People's Play and Informal Recreation 2012	The SPG seeks to ensure the provision for children of free and accessible spaces offering high quality play opportunities.	Accessible open space and access for all.
Shaping Neighbourhoods: Character and Context 2014	The Mayor has published for public consultation draft Supplementary Planning Guidance on 'Shaping Neighbourhoods: Character and Context' to help with the implementation of policies in Chapter 7 of the 2011 London Plan, particularly Policies 7.4 on Local Character and 7.1 on Building London's Neighbourhoods and Communities.	Understand character and local context to identify how a place should develop.
London Planning Statement 2014	The Mayor has published for public consultation a draft 'London Planning Statement' as proposed London Plan Supplementary Planning Guidance. This is intended to fill the gap left by the Government's revocation of the former Government Office for London Circular 1/2008 by pulling together information about the Mayor's role in the London Planning system.	Propriety (in compliance with legal requirements regarding procedural fairness and propriety, and ensuring that decisions are properly based on relevant planning considerations); Promoting Sustainable Growth; and Viability (of development).
Housing in London March 2016	Housing in London is the evidence base for the Mayor's London Housing Strategy. The Mayor formally adopted his London Housing Strategy in February 2010 and in December 2011 he consulted on proposals for a new Strategy.	Demographic pressures, housing affordability, the housing market, mobility and housing need, housing supply, decent housing, energy efficiency and fuel poverty.
All London Green Grid 2012	The All London Green Grid takes the principles of the East London Green Grid and applies them across London.	Integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways.
London's Foundations 2012	Sets out London's geological heritage, explaining the process for identifying sites of geological importance and important geological sites for protection.	Impacts on heritage assets and the wider historic environment.

Lewisham		
Lewisham Gypsy and Traveller Accommodation Needs Assessment (2015)	The assessment identifies the need for the borough to accommodate 6 or more pitches for gypsies and travellers.	Meet identified housing need.
Lewisham Sustainable Community Strategy (SCS) 2008 -2028	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.	Improve social, environmental and economic outcomes for the borough.
Lewisham Core Strategy 2011	The Core Strategy provides the spatial planning framework for the borough and is underpinned by five strategic objectives: <ul style="list-style-type: none"> • Regeneration and growth areas; • Providing new homes; • Growing the local economy; • Environmental management; • Building a sustainable community. 	Avoid, and secondarily minimise and compensate for, any significant negative effects on the community, in social and economic terms, or the environment.
Community Safety Strategy 2012-2017 (SCS), Safer Lewisham Plan 2013-14	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.	Reduce crime and the fear of crime.
Corporate Plan 2008-2011	The purpose of the Corporate Plan is to: <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. 	Improve social, environmental and economic outcomes for the borough.
Lewisham Regeneration Strategy 2008-2020	The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy complements the SCS.	Ensure the sustainable development of the borough.
Lewisham Housing Strategy 2015 -2020	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.	Provide sufficient housing of appropriate quality, mix and tenure.
Lewisham River Corridor Improvement Plan (2015)	Provides guidance relating to rivers in Lewisham.	The Council seeks to secure high quality development along the river corridors.

Lewisham Municipal Waste Strategy	The Strategy aims to minimise Lewisham's annual growth in waste.	Minimise growth in waste.
Lewisham Children and Young People's Plan 2012 - 2015	The Plan focuses on implementing actions to improve a number of key outcomes for children and young people which will improve their lives and life chances.	Improve life outcomes for residents –promotion of education, employment, housing and leisure and community facilities.
Lewisham Carbon Reduction and Climate Change Strategy 2008	The Strategy is based on achieving a lasting and sustained decrease in emissions of CO2 working with strategic partners and with citizens to: <ul style="list-style-type: none"> • reduce demand for energy; • increase energy efficiency; • increase the use of renewable energy; • tackle fuel poverty. 	Reduce the borough's carbon footprint.
Social Inclusion Strategy 2005-13	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.	Promote social inclusion, improve urban design, transport and education, and promote health and well-being in the borough.
Healthier Communities – A health and well-being framework for Lewisham (Draft 2007 – 2010)	The Strategy seeks to improve the health outcomes for Lewisham residents by adopting preventative measures and other innovative approaches.	Enhance the health levels in the borough.
Lewisham Leisure and Open Space Study 2010	This strategy aims to provide: <ul style="list-style-type: none"> • A review of outdoor sport and recreation; • a borough playing pitch strategy; • an implementation plan and prioritised investment; • Plan for the Playing Pitch Strategy. 	Protect and maintain open spaces and biodiversity across the borough.
Local Biodiversity Action Plan – A Natural Renaissance For Lewisham 2006 -2011	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.	Primarily avoid, and secondarily minimise and compensate for, any significant negative effects upon biodiversity.
Comprehensive Equalities Scheme 2016-2020	Provides a set of equality objectives and a framework to assess and evaluate the equality impact of strategic planning.	Enables the Council to demonstrate its compliance with the Equality Act 2010
Better futures: Lewisham's Homelessness Prevention Strategy 2009-2014	The Strategy complements the objectives of the Lewisham Housing Strategy and seeks to prevent	Ensure measures providing sufficient housing of appropriate quality, mix and tenure and improve

	homelessness by providing long term and sustainable housing and promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment.	access to, and opportunities for, childcare, health, education, training and employment are integrated.
Lewisham Borough Sports Plan 2010-13	The Strategy provides a vision for sport to increase opportunities to participate in sport at all levels and for all ages	Enhancing the health wellbeing levels in the borough.
Lewisham Local Air Quality Action Plan 2008	The key aim is to bring about change to reduce emissions (NO2 and PM10) from main source of pollution (road transport) in a cost-effective and proportionate way through Area Quality Management Areas (AQMA) with designated geographical boundaries.	Improve air quality. Promote land uses and activities with minimal impacts on air quality.
Lewisham Strategic Flood Risk Assessment 2008	The study identifies and provides advice to the Council on the suitability of development in areas at varying risks of flooding across the borough.	Minimise and mitigate the risk of flooding in the borough.
Lewisham Strategic Flood Risk Assessment Update (2015)	Updates previous study.	Updates previous study.
Lewisham Flood Risk and Development Sequential Test 2009	The sequential test identifies potential development sites and steers development to areas at lowest flood risk. 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.	Minimise and mitigate the risk of flooding in the borough.
Lewisham Local Implementation Plan (Transport) 2010 (LIP)	The LIP is a statutory plan to implement the London Mayor's Transport Strategy.	Seek a reduction car travel and increase sustainable transport.

Lewisham Strategic Housing Market Assessment 2008 and the South East London Sub-regional SHMA 2009	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.	Seek to facilitate housing provision, including its mix and tenure, and to ensure decent homes for all.
Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA) 2009	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 and influence the long-term commissioning priorities of health infrastructure providers in the borough.	Seek to improve the health and well-being of the borough's residents.
Lewisham Conservation Area Management Plans	Provides guidance for the management of the borough's conservation areas.	Impacts on heritage assets and the wider historic environment.
Lewisham Borough Wide Character Study 2010	The character study provides a description of the physical form of the borough, its origins, places, streets and buildings to provide an understanding of the particular attributes of the London Borough of Lewisham.	Impacts on the character of the borough.
Healthy Weight Healthy Lives (PCT with LB Lewisham) 2009	The strategy is linked in to the Children and Young People's plan and is a partnership strategy to promote healthy weight and lives in children, young people and their families.	Improve the health and wellbeing of the population and reduce inequalities in health.
Creative Lewisham – Lewisham Cultural and Urban Development Commission 2009 - 2013	Vision of Lewisham as a visually exciting, creative and imaginative hub, with a synthesis between urban design, arts, culture and the economy.	Promote a vibrant and dynamic borough.
Equality Analysis Revised Statement of Community Involvement (SCI) v.1 draft – 3 August 2016	The document sets out the draft Equalities Analysis of the Revised Statement of Community Involvement (SCI).	Seeks to implement changes to the services budget.

Appendix B

Baseline Information

1. Climate

Carbon emissions and energy consumption

There is a consensus among experts that human activities are contributing to climate change through the release of greenhouse gases into the atmosphere. This has implications for the way we use and manage resources, particularly the future supply, availability and use of energy. The built environment, and the way people use their environment, contributes to greenhouse gas emissions and therefore sustainable development plays a critical role in tackling climate change. The full effects of climate change are unknown but climate risks which are expected to intensify in London over the coming decades include flooding, higher and unseasonal temperatures, urban heat island effect and limited water resources including drought, all impacting our quality of life.¹

A significant contributor to climate change is the concentration of carbon dioxide (CO₂) in the atmosphere. According to the Department for Energy and Climate Change (2011) the total CO₂ emissions for Lewisham between 2005 and 2009 are reducing annually and the per capita reduction rate is at 17.4% since 2005. This is shown on Table A1. The figure exceeds the target of 8.5% set by the Council. The total CO₂ emission in Lewisham is 998,000 tonnes and contributed 2.35% of London's total CO₂ emissions. The largest source of emissions is from the domestic sector followed by road transport. At just 3.8 tonnes per person, Lewisham has the lowest per capita carbon emissions in inner London, the second lowest in the capital as a whole (after Redbridge) and the fourth lowest in the UK. There has been a decrease in London's per capita emissions falling by 12.7% from 6.3 tonnes person to 5.5 tonnes.

Annual CO₂ emissions (tonnes) in Lewisham 2005 to 2009

Lewisham	Industry and commercial	Domestic	Road Transport	Total	Population ('000s, mid-year estimate)	Per capita emissions (t)	Per capita reduction since 2005 (%)
2005	315	581	282	1,180	254	4.6	17.4
2006	316	572	277	1,166	257	4.5	
2007	306	556	278	1,141	259	4.4	
2008	264	556	267	1,088	262	4.2	
2009	239	500	258	998	265	3.8	

Source: DECC, 2011

Annual CO₂ emissions (tonnes) in Greater London 2005 to 2009

Greater London	Industry and commercial	Domestic	Road transport	Total	Population ('000s, mid-year estimate)	Per capita emissions (t)	Per capita reduction since 2005 (%)
2005	20,389	17,291	9,239	46,966	7,485	6.3	12.7
2006	21,738	17,193	9,114	48,089	7,547	6.4	
2007	20,977	16,807	9,050	46,876	7,602	6.2	
2008	21,157	16,865	8,664	46,726	7,668	6.1	
2009	18,752	15,232	8,419	42,441	7,753	5.5	

Source: DECC, 2011

¹ Where temperatures in urban areas, particularly at night are warmer than non-urban areas

The GLA notes that by far the largest contributor to domestic emissions is space heating and cooling, which produce three times as many emissions as either water heating or appliances, and ten times as many as lighting.² It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO₂ identified in the London Climate Change Adaptation Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels.

The emissions for Lewisham reflect its small industrial and commercial base and predominantly residential character with older properties, and its limited Underground services. It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO₂ identified in the London Climate Change Adaptation Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels. The percentage of homes that do not meet decent homes standards in the borough is reducing; however there is still a need to improve this.

The Council is proactively working to address climate change issues. The borough was awarded Beacon Status in 2005/06 for work on sustainable energy and has a wide variety of programmes aimed at energy efficiency and reducing CO₂ emissions. To implement its goals the Council has a Corporate Sustainability Board and in July 2008 published a Carbon Reduction and Climate Change Strategy to ensure it leads by example on energy efficiency. The Council's ambition is for Lewisham to play a leading role in responding to climate change locally, regionally and nationally with the aim of achieving the lowest amount per capita CO₂ emissions in London. Any future residential development will need to meet Code for Sustainable Homes Level 4 or higher. Level 4 will provide greater energy efficiency (heating and cooling) as well as water efficiency features to improve biodiversity such as a green/living roof.

Section 3.4 of the London Borough of Lewisham Renewable Evidence Base Study³ states the existing renewable energy capacity in Lewisham. A review of the Ofgem Renewables and CHP Register⁴ showed that out of over 2000 facilities for renewable energy none of them are located in the London Borough of Lewisham. Although there are no major renewable energy facilities currently in the borough there may be some standalone renewable installations that provide renewable energy on a small scale.

2. Air

There are five air quality management areas (AQMAs) in the borough, located where the level of pollutants is higher than the acceptable threshold. National Air Quality Objective (NAQO) for nitrogen dioxide (NO₂) is set at 40µg/m³ as an annual average. In urban areas, this is the most difficult target to meet. Road traffic is the main source of air pollution in the borough. Excessive road traffic, which affects areas of poor air quality, is considered to be one of the main modern 'environmental stress' factors.

² Housing in London: The Evidence Base for the Mayor's Housing Strategy, September 2014

³ London Borough of Lewisham Renewable Evidence Base Study 2010

⁴ Ofgem, "Ofgem Renewables and CHP Register",

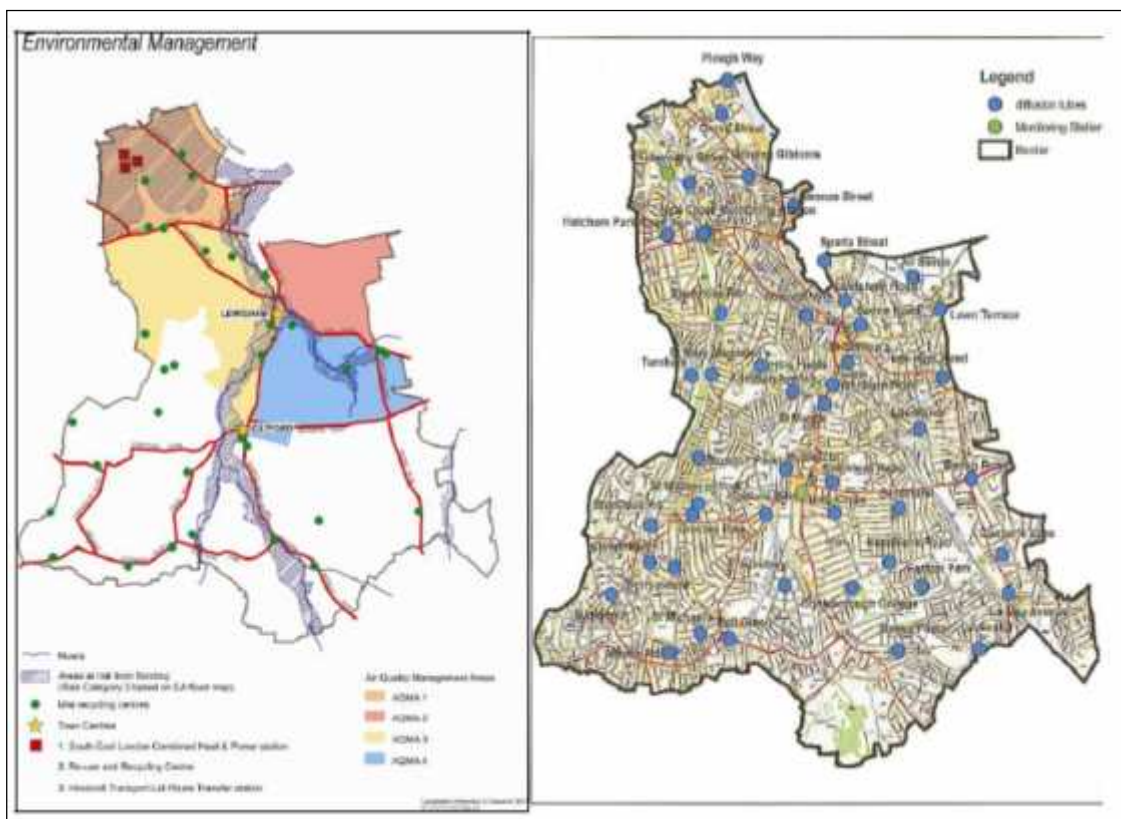
<http://www.ofgem.gov.uk/Sustainability/Environment/RCHPreg/Pages/RCHPreg.aspx>

Exposure to higher levels than $40\mu\text{g}/\text{m}^3$ is most likely to affect those who have a pre-existing respiratory illness as it causes irritation of the nose, throat and airways. However, the objectives do not necessarily represent 'safe' levels and it is agreed that authorities should continue to work to improve air quality and not just aim to meet the targets.

The borough's air quality will remain an important issue that needs to be addressed. The Council adopted an Air Quality Action Plan in 2008. The focus of which is mainly concerned with reducing emissions from road transport, with an emphasis on balancing supply side measures, such as improved walking, cycling and public transport, and demand side management, such as traffic restraint and regulation. The implementation of the London Low Emission Zone is expected to have the highest benefit in improving air quality within Lewisham AQMAs.

The Council's fourth review and assessment (Updating and Screening Assessment) of air quality was conducted in June 2009. There is a risk of the annual mean objective being exceeded for nitrogen dioxide and for particles PM_{10} . The Detailed Assessment concluded that the Council should maintain the designated AQMAs and continue the programme of monitoring which was expanded in 2010 to measure PM_{10} in a location where fugitive sources were believed to be an issue.⁵

Air Quality Management Areas in Lewisham and Monitoring Stations



⁵ Air Quality Action Plan 2008

3. Biodiversity, flora and fauna

Lewisham's natural heritage has helped shape the borough's development and continues to be a reason why people choose to live and work here. Names such as Lee Green, Grove Park and Forest Hill give an idea of the landscape from which Lewisham developed. Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields.

Lewisham has more than 560 hectares of green space (about 14% of the area of the borough), with 46 public parks covering about 370 hectares of land. Lewisham is one of the greenest parts of south-east London with over a fifth of the borough being parkland or open space.⁶ Areas of parkland and open space play an important environmental role, contributing to biodiversity within the borough.

The Stag Beetle is the largest beetle in the UK, is threatened at the global level and has undergone significant decline in the past 40 years. Recent surveys indicate south London is a national hotspot and in Lewisham they can be found throughout the borough. They require suitable dead wood for their survival and management of this resource is a key priority for land managers.

Within the borough of Lewisham there are 60 sites designated as Sites of Nature Conservation Importance (SNCI) including 19 Local Nature Reserves (LNR). In addition, the council has 21 nature conservation areas directly under ecological management, each with its own unique features.⁷ The River Thames and other waterways, private garden areas, and railway line-sides also provide valuable habitats for wildlife in the borough.⁸

4. Soil

The solid geology of Lewisham is predominantly marine London Clay in the central and southern sections of the borough, with a pocket of Lambeth Group clay in the south and a number of pockets in the north. Towards the north of the borough there are also pockets of chalk (Upper Chalk and Chalk Group) and sand (Thanet Sand Formation). In the north east and south / south eastern sections of the borough there are also pockets of Harwich Formation sand and gravels.⁹

The drift deposits are concentrated in the north and central sections of the borough, with alluvium in the vicinity of the River Thames and along the River Ravensbourne valley. Gravels of the Kempton Park Gravel Formation can generally be found adjacent to the alluvial deposits. In addition, there is a pocket of Langley Silt

⁶ Lewisham Leisure and Open Space Study 2010

⁷ Core Strategy 2011

⁸ Core Strategy 2011

⁹ London Borough of Lewisham, 2010: Contaminated Land Inspection Strategy, prepared by the Environmental Protection Group.

Formation deposits in the north west of the borough and pockets of Head (Clay) in the south of the borough.¹⁰ The borough is characterised by slowly permeable soils which are seasonally wet and slightly acid but base rich loamy and clayey in texture. Along the river corridors, and specifically in the locality of Catford town centre, the soils are loamy with naturally high groundwater.¹¹

There are currently no entries recorded in Lewisham's Contaminated Land Register.¹² This should not however, be interpreted that the land is necessarily free of contamination.

5. Water

Flood zones

The London Borough of Lewisham has some land within flood zones 2 and 3. Flood zone 2 represents the 1 in 1000 year probability of flooding, and flood zone 3 represents the 1 in 100 year probability of flooding. The area of land within flood zones 2 and 3 is predominantly around in the North of the Borough, where the risk is tidal flooding from the Thames. Other areas include the land around the river Ravensbourne and river Pool, extending to the south of the Borough and the Quaggy, extending towards the east of the Borough. In Lewisham there are approximately 21,752 properties at risk of flooding from river and tidal sources. This equates to 16% of all properties in the Borough. For the properties at risk of flooding, 8% are classified as having a significant likelihood of flooding, compared to 83% which are classified as having a low likelihood of flooding. The remainder have a moderate likelihood of flooding. Potential risk of flooding from other (non river related) sources also exists including possible sewer surcharging and surface water flooding as a result of heavy rainfall and/or blocked gullies. With changing climate patterns, it is expected that intense storms will become increasingly common and those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years.¹³

Water Framework Directives

The Water Framework Directive is European legislation designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology. The Environment Agency is the lead authority on the WFD in England and Wales. We are required to plan and deliver actions that will improve our water environment. There are three watercourses in Lewisham designated under the WFD, The River Pool, Quaggy and Ravensbourne. Under the WFD, these need to achieve good ecological potential by 2027. A programme of measures to improve the status is being developed. This will include a series of measures to address urban diffuse pollution in some parts of London, in order to achieve the 'good' ecological status required for the Directive.

¹⁰ Contaminated Land Inspection Strategy, 2010.

¹¹ National Soil Resources Institute (NSRI) Soilscales website <http://www.cranfield.ac.uk/sas/nsri/>

¹² Lewisham Borough Council website: www.lewisham.gov.uk

¹³ SFRA 2008

Water Quality: Chemical Water Quality

The only watercourse in the Borough currently designated under the chemical General Quality Assessment (GQA) is the section of the River Ravensbourne between the River Pool and the Tideway. New chemical GQA calculations have been introduced under which biological oxygen demand has been removed as one of the parameters. This means the calculation is now based on ammonia and dissolved oxygen levels to grade each river reach. Using this method, the chemical quality has consistently been found to be very good, having achieved a grade A every year between 2000 and 2009. There has been a reduction in the size of the GQA network over the last few years. The River Quaggy and the River Pool were designated up until 2006. The quality of the River Quaggy was good, with the reach achieving a grade B on average. The quality of the River Pool was only fairly good, as it predominantly achieved a grade C.

The River Quaggy and River Ravensbourne merge in Lewisham town centre, and these rivers have quite similar catchments. Unusually there are no major point sources of pollution in these urban rivers, and water quality issues (principally related to nutrients) arise from diffuse urban sources such as road runoff and missed connections, where domestic sewerage is wrongly connected to pipes intended for surface water runoff. As a result, water quality is very variable, and can be good during periods of dry weather.

Householder Water Use

All of Lewisham falls in Thames Water's London resource zone, where average consumption in 2009-10 was 167 litres per person per day.¹⁴ This compares to the five year average for the Borough of 160.4 litres consumed per person per day between 2005/06 and 2009/10. This water resource zone (WRZ) is seriously water stressed. The Government has set a target for households to achieve 130 litres per person per day, which will require changes to consumption patterns in order to meet it. Through the Code for Sustainable Homes, any future residential development in Lewisham will need to meet Code for Sustainable Homes Level 4. Level 4 will provide greater water efficiency features to encourage sustainable consumption of drinking water within buildings and external watering/irrigation.

¹⁴ Thames Water, 2010. Thames Water revised Water Resources Management Plan. [online] (Updated 2010) Available at: <http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/5392.htm>

6. Population, human health and equality

Population

The population of the London Borough of Lewisham was 275,885 at the 2011 census. The population of Lewisham grew by 3% between 2001 and 2011. It is forecast to increase by almost a quarter (64,300) between 2006 and 2031.¹⁵ Children and young people (0 to 19 years) make up over a quarter of the population, one of the highest proportions in London.¹⁶ Elderly residents (over 75 years) make up just 5%. The average age of our population is 34.7 years and is young when compared with other London boroughs. Population growth and an increase in the number of households is expected to be concentrated within the Evelyn, New Cross and Lewisham Central wards. This is due in part to the major development and regeneration plans such as Convoys Wharf and within the Lewisham Town Centre. In terms of life expectancy for the borough's population, between 2005 and 2007 the average life expectancy at birth for men in Lewisham was 76 years, compared with 77.3 years in England; and over the same period the life expectancy for women was 80.8 years in Lewisham compared with 81.5 years in England.¹⁷ The population was more or less evenly split between males and females and these proportions are not expected to change in the period to 2014.¹⁸

There was a growth in all groups of the black and minority ethnic (BME) population between the 2001 and the 2011 Census. This has risen from 39% of households to 58.5%, who largely live in the northern and central parts of the borough.¹⁹ The general level of health of people in Lewisham is significantly poorer than the health of people in the rest of England. Some indicators of poor health are specifically related to low income such as coronary heart disease, cancer and respiratory disease. Reducing premature mortality from circulatory diseases and cancer remain priorities for Lewisham.²⁰

The Index of Deprivation 2015 ranked Lewisham as the 19th most deprived area in the UK that affects children and older people. It also states the population for Lewisham has increased since the census and is now 293,100²¹. Lewisham is within the 20% most deprived Local Authorities in the country. In 2010 Lewisham was ranked the 31st most deprived Local Authority. Although the recent ranking is lower than in the 2010 Index of Deprivation, a number of local authorities that were previously within the 20% most deprived nationally are no longer in existence. The Index of Deprivation looks at a range of indicators covering income, employment, health, education, training, skills, living conditions and access to services.

¹⁵ Greater London Authority 2008 Round of Demographic Projections, RLP High

¹⁶ Census 2011

¹⁷ JSNA, NHS London

¹⁸ Male 49% and female 51%.

¹⁹ BME population estimated at 49.4% of households as evidenced through the Lewisham Household Survey 2007 for the Strategic Housing Market Assessment (SHMA)

²⁰ Joint Strategic Needs Assessment (JSNA), NHS Lewisham

²¹ London Datastore <http://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html>

In the 2015 Index of Deprivation of Lewisham's 166 LSOAs 40% were in the 20% most deprived in England, compared with 38% in 2007. Only five of these LSOAs were within the worst 10% (this is the same as in the 2010 ID); they are dispersed across the wards of Bellingham, Evelyn, Lewisham Central, Rushey Green and Whitefoot. However, 58 of Lewisham's LSOAs were in the bottom 10-20% (up two from 2007); making a total of 63 LSOAs in the bottom 20%.

With nearly 40% of Lewisham's LSOAs in the bottom 20%, and almost all of the remaining LSOAs being in the bottom 50%, the ID results again suggest that Lewisham faces some significant challenges. Care must be taken not to assume that 'less deprived' means 'wealthier' as the indices measure only levels of deprivation, not affluence. In addition, it is important to recognise that even in LSOAs with little deprivation there may be individuals and families experiencing deprivation. These people will also need to access support and services aimed at tackling deprivation.

Health

There are many healthcare facilities in Lewisham. There are a vast array of health services incorporating the needs of the population. The main health care services in Lewisham are community services as well as a university hospital and several mental health centres²².

The following list details these:

Southbrook Road Community Mental Health Centre – 1 Southbrook Road, Lee
Speedwell Mental Health Centre – Speedwell Street
Cygnet Lodge Lewisham – Lewisham Park
University Hospital Lewisham – High Street, SE13 6LH
Burgess Park – Unit 2, Burgess Park Industrial Estate, SE5 7TG
Downham Health and Leisure Centre – 7-9 Moorside Road, Downham, BR1 5EP
Primary Care Centre Hawstead Road - Primary Care Centre, Hawstead Road, Catford, SE6 4JH
Honor Oak Health Centre - 20 Turnham Road, Honor Oak Rd, SE4 2HH
Ivy House - Bradgate Road, Catford, SE6 4TT
Kaleidoscope - 32 Rushey Green, Catford, SE6 4JF
Jenner Health Centre - 201-3 Stanstead Road, Forest Hill, SE23 1HU
Lee Health Centre - 2 Handen Road, Lee, SE12 8NP
Marvels Lane Health Centre - 37 Marvels Lane, Grove Park, SE12 9PN
South Lewisham Health Centre - 50 Conisborough Crescent, Bellingham, SE6 2SP
Sydenham Green Health Centre - 26 Holmshaw Close, Sydenham, SE26 4TH
Waldron Health Centre - Amersham Vale, New Cross, SE14 6LD

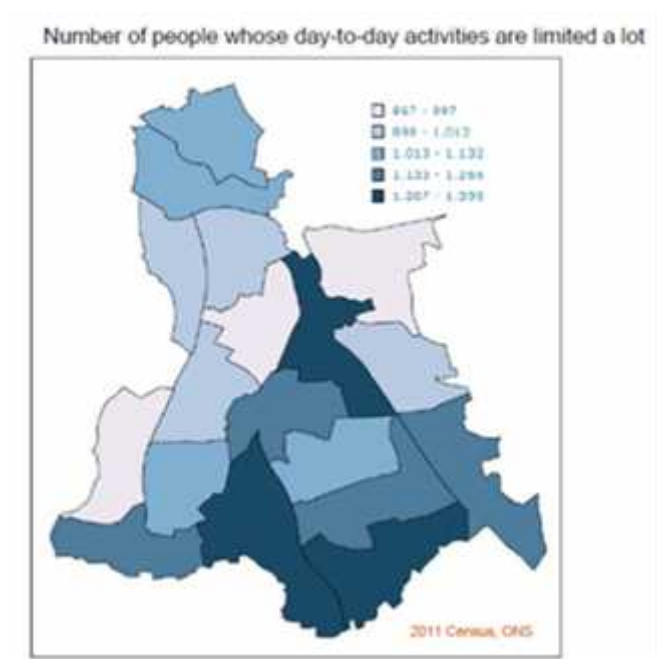
²² <https://www.lewishamandgreenwich.nhs.uk/contact-community-sites-in-lewisham/>

Equality

The 2011 Census indicates 14.4% of the Lewisham population (39,735) had a limiting long-term illness. Of these, 7.3% of people (19,523) indicated their daily activities were limited a lot. Analysis by Public Health England for its learning disability profiles indicates that Lewisham has average numbers of learning disabled people (16-64) known to the Council (four per 1000).

Analysis of Lewisham's recent residents survey found that less than half of disabled residents (48%) were confident that their local community would be able to help if a service in their local area was under threat, compared to two-thirds of nondisabled residents (66%).

The figure below shows long term health problems or disabilities in Lewisham (Census 2011).



The census categories used for mapping are broad (essentially white/non-white) and mask high levels of local diversity as well as differing national and cultural origins. The largest combined ethnic group in the borough is categorised in the census as White; English/Welsh/Scottish/Northern Irish/British. There was a growth in all groups of the black and minority ethnic (BME) population between the 2001 and 2011 Census. This has risen from 39% of households to 58.5%, who largely live in the northern and central parts of the borough.

Christianity is the most populous religion of Lewisham residents, particularly in the south of the borough. Between 2001 and 2011, the percentage of people citing Christianity as their religion declined by 8.4%, from 61.2% to 52.8%. Over a quarter of residents stated that they have no religion and this increases to a third of residents in Blackheath, Brockley, Crofton Park, Forest Hill and Telegraph Hill.²³

²³ Lewisham's Comprehensive Equalities Scheme 2016-2020

7. Material assets

Homes

Continuous growth in population and high demand for housing and affordability

The population is forecast to rise. The Mayor of London requires 10,050 new residential units to be built in Lewisham by 2021. The average income of the majority of households is insufficient to buy a house. The SE London and Lewisham Strategic Housing Market Assessments highlight that access to affordable housing remains an issue throughout the borough. Based on the GLA Housing Price 2008 data, the housing price in Lewisham has increased steadily over the last five years. However, it is still lower than the London average price (£249,789 compared to £297,785).²⁴ This is particularly relevant given that the Lewisham Household Survey for the SHMA asked a question about household income. This included gross household income from all sources such as earnings, pensions, interest on savings, rent from property and state benefits. While just under a fifth of households have an income of over £40,000, however nearly half of all households have an income of less than £15,000.²⁵

Existing dwelling stock

Of the total dwelling stock, 54% of properties in Lewisham are flats of which nearly half are converted dwellings rather than purpose built. Of the remainder 34% are terraced houses and 12% are detached or semi-detached.²⁶ In terms of bedroom size, 27% of properties are 1 bedroom, 33% 2 bedroom and 30% 3 bedroom. This leaves 10% with 4 or more bedrooms.

A dramatic change has taken place in the tenure of property in the London borough of Lewisham in the past few years. This provides a roughly equal tenure split between private rent, social rent and private ownership. It is considered that the increase in the private rented sector is a result of the buy-to-let market in recent years. The amount of private rented properties has increased from 14.3% in 2001 to 24.3% in 2011. Conversely social rented properties have fallen from 35.6% in 2001 to 31.1% in 2011, while properties owned outright or with a mortgage have decreased from 50% in 2001 to 42.4% in 2011.²⁷

A total of 33,922 households were assessed as living in unsuitable housing due to one or more factors.²⁸ The largest reason was overcrowding (11,482 households), and major disrepair or unfitness (10,641); followed by support needs, accommodation too expensive and sharing facilities (6,151, 5,263, and 4,487 respectively). Deptford is one area in the borough most likely to contain unsuitably housed households which corresponds to areas identified with higher levels of deprivation.²⁹

²⁴ Land Registry, March 2009

²⁵ 48%

²⁶ Lewisham Household Survey 2007, SHMA 2014

²⁷ Lewisham Household Survey 2007, SHMA 2014, 2011 Census

²⁸ Lewisham Household Survey 2007, SHMA 2014, 2011 Census

²⁹ Lewisham Household Survey 2007, SHMA 2014, 2011 Census

Affordable Housing

Lewisham's housing strategy, Homes for future³⁰, states that the council aims to deliver 11,000 homes by 2020 of which up to 50% will be affordable housing with the aim to reduce homelessness and the number of households in temporary accommodation and also to enable people on low and modest incomes to afford their own home. The tenure mix of affordable housing is agreed on an individual basis, it takes into consideration the existing housing mix and character as well as the demand in the area for affordable housing.

8. Cultural heritage

The complex historical development of the borough has left a legacy of distinctive neighbourhoods. In acknowledgement of this distinctive heritage a substantial portion of the borough is identified as an Archaeological Priority Area. An archaeological priority area is an area specified by Local Planning Authorities to help protect archaeological remains that might be affected by development. This means that any redevelopment in these areas that might reveal remains of interest will be required to undertake an assessment and preservation in accordance with advice from English Heritage.

Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. These open spaces have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets. For example, the open character of Blackheath is an integral element of the Blackheath Conservation Area and a supporting element to the outstanding universal value of the Maritime Greenwich World Heritage Site. The small area of open space within the Culverley Green Conservation Area provides a welcome element of informality to the grid pattern of tree lined streets.

Lewisham has around 27 conservation areas covering 707 ha of the borough, around 540 nationally-listed buildings, over 200 Locally Listed buildings, 2 Registered Parks and Gardens, 21 areas of Archaeological Priority and 1 Scheduled Ancient Monument. Lewisham's open spaces also have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets.

9. Landscape

The borough of Lewisham is primarily residential in nature, characterised by 20th century suburbs in the south to older Victorian neighbourhoods in the north. These extensive areas of housing are punctuated with a network of small and large town centres, local shopping parades, employment areas of varying quality and job density, many parks and green spaces, and railway corridors, and are overlaid by a range of heritage assets.

³⁰ 'Homes for the future: raising aspirations, creating choice and meeting need' Lewisham's Housing Strategy 2009-2014

The borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. In fact, Lewisham has more than 560 hectares of green space (about 14% of the area of the borough), with 46 public parks covering about 370 hectares of land. These areas play an important environmental and recreational role as well as defining and continuing to contribute to Lewisham's overall character.

Lewisham is located within the London Basin Natural Area³¹ and is defined by an urban / suburban land use according to the Dudley Stamp Land Use inventory.³² The landscape character of the borough is focused around the Ravensbourne, Quaggy and Pool rivers which flow into Deptford Creek. Elevated views play a significant role in the character of the area. There is a general gradient of development across the borough from oldest in the north to more modern in the south. As London has grown, the borough has seen successive rounds of urbanisation moving south across the borough.³³

Lewisham also has 37 allotment sites which are very popular with local residents. Because of the current interest in healthy, outdoor living and organic food, all of the sites have waiting lists. No areas within the borough are designated as Greenbelt land. Of the 37 allotment sites within the borough, one relatively small allotment can be found in the Rushey Green ward at the Weavers Estate (0.42 ha).

Compared to a city average of 41%, only 23% of land in the borough of Lewisham is green space or water. Despite having 560 ha of green space, parts of the borough are considered to be deficient in open space, and with increasing pressures to build, the borough aspires to protect all its green space.³⁴

10. Waste

Lewisham is a unitary waste authority. Over 80% of Lewisham's waste is diverted away from landfill by incinerating it as the South East London Combined Heat and Power Station (SELCHP), which recovers power to supply to the National Grid. Of the borough's total waste for 2010/11 only 6% was sent to landfill. The borough incinerates 76% of its household waste. Lewisham has on the other hand the lowest recycling and composting rate in London in 2009/10. The overall household recycling and composting rate in Lewisham has steadily between 2000/01 and 2007/08. However, the rate has since declined. The current recycling and composting rate is almost 15% lower than the London total rate of 31.8%.³⁵

³¹ English Nature, 1997: London Basin Natural Area Profile

³² www.magic.gov.uk

³³ Lewisham Borough Council, May 2011: Development Management Local Plan Sustainability Appraisal Scoping Report

³⁴ Lewisham Borough Council, May 2011: Development Management Local Plan Sustainability Appraisal Scoping Report

³⁵ Department for Environment, Food and Rural Affairs (Defra), 2013. Municipal Waste Management Statistics. [online] (Updated 07/02/2013) Available at: <http://www.defra.gov.uk/statistics/environment/>

The Council aims to increase household recycling / composting and in 2010/11 has set a target to recycle compost or reuse 25% of its household waste. Further, targets have been set to landfill 8% of municipal waste by 2010/11 and to reduce household waste per household to 716kg in 2010/11.³⁶ There is a projected waste growth of 3% per annum, which means that disposing of this increasing amount and variety of waste will become increasingly difficult. Every borough is allocated an apportionment of waste in the London Plan that they must dispose of using appropriate facilities. For Lewisham this equates to approximately 208,000 tonnes in 2010, increasing to 323,000 tonnes by 2020.³⁷ Provision in the borough exceeds this level with the South East London Combined Heat and Power Station (SELCHP) in Deptford capable of handling 488,000 tonnes alone. Further facilities in Lewisham are capable of dealing with over 200,000 tonnes and provide support to other boroughs in the south-east region of London.³⁸

³⁶ Lewisham Municipal Waste Strategy 2008

³⁷ London Plan policy 4A.25 and Table 4A.6

³⁸ Southeast London Boroughs' Joint Waste Apportionment Technical Paper, 2009 and 2014

Appendix C

Sustainability Objectives, Indicators, Targets and Monitoring

Sustainability Objective	Indicator	Target	Monitoring Year/Frequency	Data Source	Action
1. To provide sufficient housing and the opportunity to live in a decent home	Number of housing completions Gypsy and Traveller pitches Number of affordable housing completions (by tenure type) Mix of housing tenure Mix in dwelling sizes Provision of student/other specialist housing	50% affordable homes 70:30 split between social and intermediate housing At least 40% affordable homes to be 3 bedrooms or more	Annual	Annual Monitoring Report	Allocation of Gypsy and Traveller pitches Provision of housing, including affordable housing
2. To improve the health of the population	Households with limiting long-term illness Mortality rate from circulatory diseases at age under 75 Mortality rate from all cancers at age 75 of under Health life expectancy at age 65 Number of people taking part in activities that improve physical and mental health in the borough		Every 10 years	ONS	Encourage walking and cycling Maintain or improve access to healthcare
3. To reduce poverty and social exclusion	Number of recorded racial incidents Indices of Multiple Deprivation	Improve the London Borough of Lewisham's rank in the Indices of Multiple Deprivation	Every 3 years	CLG	Promote social cohesion and reduce poverty

<p>4. To improve accessibility to leisure facilities, community infrastructure and key local services</p>	<p>Gain/loss of community/recreational facilities</p> <p>Delivery of identified social infrastructure</p> <p>Funding for community facility improvements secured</p>	<p>No net loss of recreational facilities</p>	<p>Annual</p>	<p>Annual Monitoring Report</p>	<p>Provision of leisure facilities, community infrastructure and key local services</p>
<p>5. To reduce crime, antisocial behavior and the fear of crime</p>	<p>Number of schemes incorporating 'secured by design'</p> <p>Number of offences per 1,000 population</p> <p>Detailed indicators for the following:</p> <ul style="list-style-type: none"> • Violence against the person • Burglaries • Robberies • Violent crime • Sexual offences 		<p>Annual</p>	<p>Office of National Statistics</p> <p>Metropolitan Police Service</p>	<p>Promote safety of the environment and social cohesion</p>
<p>6. To reduce car travel and improve accessibility by sustainable modes of transport</p>	<p>Number of car parking spaces delivered in new development</p> <p>Number of completed car limited developments</p> <p>Number of car clubs and parking bays</p> <p>% of permitted major developments with a travel plan</p> <p>Proportion of journeys made on foot and by bicycle</p> <p>Number of electric car charging points</p>	<p>Higher density development to be located within areas with a higher PTAL</p> <p>11% of total trips made by cycle or foot by 2025</p> <p>Year on year increase in number of electric car charging points</p> <p>All major developments to have travel plans</p>	<p>As reviewed by Transport for London</p>	<p>Transport for London</p> <p>Census</p> <p>Annual Monitoring Report</p>	<p>Maximise accessibility of Gypsy and Traveller sites to services and public transport</p> <p>Enhance walking and cycling routes</p> <p>Reduce car ownership</p>

	<p>Improvements to legibility and signage</p> <p>Improved pedestrian and cycle routes and crossings</p> <p>Number of cycle parking spaces provided for each new home or other development and public realm</p> <p>Improved lighting and natural surveillance on pedestrian and cycle paths</p> <p>Number of road accident casualties per 1,000 population serious or fatal</p> <p>Public transport accessibility levels</p>	All development permitted to include cycle facilities			
7. To mitigate and adapt to the impact of climate change	<p>Number of homes achieving Code for Sustainable Homes level 4 or above granted/completed</p> <p>Number of BREEAM buildings granted/completed</p> <p>Number and capacity of decentralised energy granted/completed</p> <p>Number, type and capacity of renewable energy granted/completed</p> <p>Number and size of living roofs granted/completed</p> <p>Number of new developments incorporating water efficiency measures</p>	<p>Maximise renewable energy by type</p> <p>Increase in the number of living roofs and walls</p> <p>Year on year reduction in the carbon footprint of Lewisham</p> <p>All houses built to Code for Sustainable Homes Level 4</p> <p>All non-residential development built to BREEAM excellent standard</p>	Annual	<p>Annual Monitoring Report</p> <p>EA and Stockholm Environment Institute</p>	<p>CO2 reduction and energy efficiency</p> <p>Efficient use of natural resources</p>
8. To improve air quality and water quality, manage water resources and reduce noise and	<p>Water pollution incidents</p> <p>Change in chemical river quality</p>	National Air Quality Strategy standards	Annual	Annual Monitoring	Water management and SUDS

vibration	<p>Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</p> <p>LLSOA Electricity and Gas consumption</p> <p>Per capita reductions in CO2</p> <p>Levels exceeding Main Air Pollutant Quality Standards</p> <p>Levels of NO2 and PM10</p> <p>Number of complaints related to noise from roads, construction, maintenance, noisy neighbours and/or other.</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p>	<p>Reduction in noise complaints</p> <p>No decrease in water quality</p>		<p>Report</p> <p>London Air Quality Archive</p>	<p>implementation</p> <p>Minimise air pollution</p> <p>Reduce noise</p> <p>Consider compatibility of land uses</p>
9. To increase, maintain and enhance open space, biodiversity, flora and fauna	<p>Area of designated habitats</p> <p>Number and size of biodiverse brown living roofs granted/completed</p> <p>Number of bat and other bird boxes delivered as part of new developments</p> <p>Number of applications granted or refused on designated open space and within SINCS</p> <p>Amount of new or improved open space provided, including that which provides a net gain for biodiversity and accessible natural greenspace</p>	<p>Year on year reduction in the ecological footprint of Lewisham</p> <p>Year on year increase in the number of bat and bird boxes provided with development</p> <p>No net loss of open space</p>	Annual	<p>Annual Monitoring Report</p> <p>EA and Stockholm Environment Institute</p>	<p>Efficient use of natural resources</p> <p>Maintain or enhance biodiversity importance</p> <p>Protect and enhance open space and linkages</p>

	<p>Number of new allotments and community gardens</p> <p>Funding secured for open space improvements</p>				
<p>10. To mitigate and reduce flood risk, improve water quality, manage water resources, and restore and enhance the river network.'</p>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defense grounds or water quality</p> <p>Number of SUDS granted and delivered</p> <p>Flooding incidents</p>	<p>No applications granted contrary to Environment Agency advice</p>	<p>Annual</p>	<p>Environment Agency</p>	<p>Work in partnership with the Environment Agency</p> <p>Flooding and water management</p>
<p>11. To maintain and enhance landscapes and townscapes</p>	<p>Number of key views maintained and enhanced</p> <p>Pre applications and applications considered by the design review panel</p> <p>Number of interventions aimed at improving streetscapes</p>	<p>All major applications to be referred to the design review panel</p>	<p>Annual</p>	<p>Annual Monitoring Report</p>	<p>Protect landscape and townscape</p>
<p>12. To conserve and where appropriate enhance the historic environment</p>	<p>Number of designated heritage assets (including listed buildings and conservation areas)</p> <p>Number of undesignated heritage assets (locally listed buildings, areas of archaeological significance)</p> <p>% of applications where archaeological strategies were developed and implemented</p>		<p>Annual</p>	<p>Annual Monitoring Report</p> <p>English Heritage</p>	<p>Protect heritage assets</p>

	<p>Number of applications that have considered views of strategic importance</p> <p>Condition of designated and undesignated heritage assets</p>				
<p>13. To minimise the production of waste and increase waste recovery and recycling</p>	<p>% of waste recycled, reused or composted</p> <p>Tonnes of waste sent to landfill per year</p> <p>Residual household waste per year</p> <p>Amount of waste recycled on site by residents and employment industries</p>	<p>Residual waste per household in Lewisham</p> <p>2011/2012 720kg</p> <p>2012/2013: 718kg</p> <p>2013/2014: 716kg</p> <p>% of household waste sent for reuse, recycling and composting in Lewisham</p> <p>2013/2014: 21% waste recycled</p> <p>% household waste sent to landfill in Lewisham</p> <p>2011/2012: 7%</p> <p>2012/2013: 6.5%</p> <p>2013/2014: 6%</p>	<p>Annual</p>	<p>Strategic Waste and Management</p>	<p>Waste Management</p>

14. to reduce land contamination and safeguard soil quality and quantity	Number of planning applications with the potential for land contamination	No reduction in soil quality	Every 10 years	Annual Monitoring Report	Land remediation
15. To encourage sustained economic growth	<p>Area of employment land with mixed use employment location (MEL) and local employment location (LEL)</p> <p>Size and type of employment floorspace</p> <p>Amount of vacant employment floorspace</p> <p>Amount of new completed employment floor space</p> <p>New business registration rate</p> <p>Rent levels of employment accommodation</p>	<p>No loss of employment land</p> <p>Minimise vacant employment land</p> <p>Annual completion no net loss</p>	Annual	<p>Lewisham ELS</p> <p>London Borough of Lewisham GIS</p> <p>Annual Monitoring Report</p>	<p>Protection of employment sites</p> <p>Maintain a supply of a variety of employment floorspace</p>
16. To promote access to employment, education, skills and training	<p>Employee numbers in Lewisham</p> <p>% of businesses in the area showing employment growth</p> <p>Job density in Lewisham</p> <p>Number of employed and unemployed living in the area</p> <p>Numbers of employees and business owners who are BME</p> <p>% of population of working age who claim unemployment benefit</p> <p>Number of pupils achieving 5 or more GCSE's at grades A* to C or equivalent</p>	<p>Increase in jobs</p> <p>Increase in percentage of local residents employed for specific development projects, including apprenticeships</p> <p>No reduction in job density</p> <p>Increase in employment rate</p> <p>Narrow gap to the GB average employment rate to no more than</p>	Annual	<p>National Annual Business Inquiry</p> <p>Office of National Statistics</p> <p>Official Labour Market Statistics</p>	<p>Maximise and provide a range of local employment opportunities</p> <p>Protection of employment sites to secure local job opportunities</p> <p>Local labour agreements</p>

	<p>People aged 16-74 with no qualifications</p> <p>Number of full and part time courses provided</p> <p>Number of full and part time people participating in educational courses/events in the area</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p>	<p>3% points</p> <p>Year on year decrease in the number of people without qualifications in Lewisham</p>			
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